UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

In re: MODIVCARE INC., et al Debtor	§	
	§	Civil Action No. 4: 26-cv-03651
	§	
	§	Bankruptcy Case No 25-90309
MODIVCARE INC., et al Appellant	§ §	

Record Transmitted

The bankruptcy clerk has transmitted the record for this appeal to the district court. *See* Fed. R. Bankr. P. 8010 (b). Unless the district court orders otherwise, the following deadlines apply. *See* Fed. R. Bankr. P. 8018.

1. The appellant's brief must be filed within 30 days after entry of this notice.
2. The appellee's brief must be filed within 30 days after service of the appellant's brief.
3. The appellant may file a reply brief within 14 days after service of the appellee's brief, but a reply brief must be filed at least 7 days before scheduled argument.

Date: June 24, 2026

Nathan Ochsner, Clerk of Court

Deputy Clerk H. Lerma

2590309260630000000000002

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

NOTICE OF APPEAL
(Ref. ECF No. 1502)

COMES NOW, ModivCare Topco, LLC (**"ModivCare**") and files this Notice of Appeal as follows:

1. Appellant is ModivCare Topco, LLC, the Reorganized Debtor in the above referenced bankruptcy case.

2. The subject of the appeal is the bankruptcy court's *Order Requiring the Reorganized Debtors To Deposit Funds In Escrow With The Court* (ECF No. 1502) (**"Deposit Order"**).

3. A copy of the Deposit Order, dated April 30, 2026, is attached as Exhibit A.

4. This Notice of Appeal is being filed within 14 days after the entry of the Fee Order and is a timely notice of appeal.

5. The other parties to this appeal are:

a. *White & Case LLP*
Charles Koster
Suite 2900
609 Main St.
Houston, TX 77002

b. *AlixPartners, LLP*
David MacGreevey
909 Third Avenue, 28th Floor
New York, NY 10022

Dated: May 1, 2026.

Respectfully submitted,

By: */s/ Johnie Patterson*
Johnie Patterson
attorney-in-charge
SBN 15601700
COUNSEL FOR MODIVCARE
TOPCO, LLC

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and complete copy of the foregoing Notice of Appeal was served via electronic transmission on May 1, 2026 on all parties receiving notices from the Court's CM/ECF servicing platform, as well as Charles Koster and David MacGreevey.

/s/Johnie Patterson
Johnie Patterson

United States Bankruptcy Court
Southern District of Texas
ENTERED
April 30, 2026
Nathan Ochsner, Clerk

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

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

ORDER REQUIRING THE REORGANIZED DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the "W&C Application"), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the "AlixPartners Application" and, together with the W&C Application, the "Applications"); and in accordance with the Court's rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court Registry"), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

in the Applications, including $628,727.58 in connection with the W&C Application and $1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. This is a final order.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: April 30, 2026

Alfredo R Pérez
United States Bankruptcy Judge

COMPLX, LEAD, COMPLX, APPEAL, APPEAL_NAT

U.S. Bankruptcy Court
Southern District of Texas (Houston)
Bankruptcy Petition #: 25-90309

Date filed: 08/20/2025
Plan confirmed: 12/15/2025

Assigned to: Bankruptcy Judge Alfredo R Perez
Chapter 11
Voluntary
Asset

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Official Committee Of Unsecured Creditors

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Filing Date	#	Docket Text
08/20/2025	1 (40 pgs)	Chapter 11 Voluntary Petition Non-Individual Fee Amount $1738 Filed by ModivCare Inc.. (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	2 (5 pgs; 2 docs)	Designation of Complex Chapter 11 Bankruptcy Case (Filed By ModivCare Inc.). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	3 (21 pgs; 4 docs)	Ex Parte Emergency Motion | *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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Exhibit A (Verita Engagement Letter) # 2 Exhibit B (Gershbein Declaration) # 3 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	4 (271 pgs; 3 docs)	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 Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order (Exhibit A) # 2 Exhibit B (Form of Backstop Commitment Letter)) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	5 (56 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	6 (40 pgs; 3 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order (Interim Order) # 2 Proposed Order (Final Order)) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	7 (43 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	8 (35 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	9 (38 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	10 (3 pgs)	Notice of Appearance and Request for Notice Filed by Matthew L Warren Filed by on behalf of First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 08/20/2025)
08/20/2025	11 (1 pg)	MOTION to Appear Pro Hac Vice for Kristopher M. Hansen (Fee Paid: $100, receipt number A26416360) Filed by Creditor First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 08/20/2025)

08/20/2025	12 (20 pgs)	Declaration re: *Declaration of Zul Jamal in Support of the Debtors' Motion to Obtain Postpetition Debtor-In-Possession Financing* (Filed By ModivCare Inc.).(Related document(s):4 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	13 (1 pg)	MOTION to Appear Pro Hac Vice for Lindsey Henrikson (Fee Paid: $100, receipt number A26416365) Filed by Creditor First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 08/20/2025)
08/20/2025	14 (225 pgs)	Declaration re: *Declaration of Chad J. Shandler in Support of Debtors' Chapter 11 Petitions and First Day Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	15 (65 pgs; 2 docs)	Emergency Motion *of Debtors For Entry of An Order (A) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees, and (B) Granting Related Relief* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	16 (64 pgs; 5 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Exhibit A (Cash Management Schematic) # 2 Exhibit B (Bank Account List) # 3 Proposed Order (Interim Order) # 4 Proposed Order (Final Order)) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	17 (27 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	18 (13 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/21/2025	19 (51 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	20 (28 pgs; 2 docs)	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 Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	21 (45 pgs; 2 docs)	Emergency Motion *of Debtors for an Order Directing Joint Administration of Chapter 11 Cases* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	22 (2225 pgs; 23 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 (First Day Declaration) # 2 Exhibit 2 (DIP Declaration) # 3 Exhibit 3 (DIP Credit Agreement) # 4 Exhibit 4 (Chapter 11 Milestones) # 5 Exhibit 5 (Initial DIP Budget) # 6 Exhibit 6 (DIP Lien/Claim Priorities) # 7 Exhibit 7 (Form of Backstop Commitment Letter) # 8 Exhibit 8 (RSA) # 9 Exhibit 9 (Corporate Structure Chart) # 10 Exhibit 10 (Cash Management Schematic) # 11 Exhibit 11 (Bank Account Listing) # 12 Exhibit 12 (Utility Service List) # 13 Exhibit 13 (Insurance Policies) # 14 Exhibit 14 (Letters of Credit) # 15 Exhibit 15 (Surety Bonds) # 16 Exhibit 16 (Taxing and Regulatory Authorities) # 17 Exhibit 17 (NOL Procedures) # 18 Exhibit 18 (1L Credit Agreement) # 19 Exhibit 19 (2L Notes Indenture) # 20 Exhibit 20 (Intercreditor Agreement) # 21 Exhibit 21 (Senior Notes Indenture) # 22 Exhibit 22 (Subordination Agreement)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	23 (5 pgs)	Notice *of Emergency Virtual Hearing on First Day Motions*. (Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 3 Emergency Motion (with hearing date), 4 Emergency Motion (with hearing date), 5 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 7 Emergency Motion (with hearing date), 8 Emergency Motion (with hearing date), 9 Emergency Motion (with hearing date), 12 Declaration, 14 Declaration, 15 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 17 Emergency Motion (with hearing date), 18 Emergency Motion (with hearing date), 19 Emergency Motion (with hearing date), 20 Emergency Motion (with hearing date), 21 Emergency Motion (with hearing date), 22 Witness List, Exhibit List) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	24 (1 pg)	MOTION to Appear Pro Hac Vice for Montana Licari (Fee Paid: $100, receipt number A26416911) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025	25 (1 pg)	MOTION to Appear Pro Hac Vice for Nikhil A. Gulati (Fee Paid: $100, receipt number A26416912) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025	26 (1 pg)	MOTION to Appear Pro Hac Vice for Brian Isaac Herskowitz (Fee Paid: $100, receipt number A26416913) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)

08/21/2025	27 (20 pgs)	Order for Joint Administration Signed on 8/21/2025 (Related Doc # 21). (tjl4) (Entered: 08/21/2025)
08/21/2025	28 (2 pgs)	Order Granting Complex Case Treatment, Signed on 8/21/2025 (Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case) (tjl4) (Entered: 08/21/2025)
08/21/2025	29 (5 pgs)	Agenda for Hearing on 8/21/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	30 (3 pgs)	Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC DBA Verita Global as Claims, Noticing, and Solicitation Agent (Related Doc # 3) Signed on 8/21/2025. (tjl4) (Entered: 08/21/2025)
08/21/2025	31 (1 pg)	MOTION to Appear Pro Hac Vice for Elizabeth Marks (Fee Paid: $100, receipt number A26418438) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025	32 (1 pg)	Order Granting Motion for Kristopher M. Hansen To Appear pro hac vice (Related Doc # 11) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	33 (1 pg)	Order Granting Motion for Lindsey Henrikson To Appear pro hac vice (Related Doc # 13) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	34 (1 pg)	Order Granting Motion for Montana Licari To Appear pro hac vice (Related Doc # 24) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	35 (1 pg)	Order Granting Motion for Nikhil A. Gulati To Appear pro hac vice (Related Doc # 25) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	36 (1 pg)	Order Granting Motion for Brian Isaac Herskowitz To Appear pro hac vice (Related Doc # 26) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	37 (1 pg)	Order Granting Motion for Elizabeth Marks To Appear pro hac vice (Related Doc # 31) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	38 (1 pg)	MOTION to Appear Pro Hac Vice for Emma Fleming (Fee Paid: $100, receipt number A26419055) Filed by Creditor Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)

08/21/2025	39 (1 pg)	MOTION to Appear Pro Hac Vice for Jonathan I. Levine (Fee Paid: $100, receipt number A26419079) Filed by Creditor Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)
08/21/2025	40 (1 pg)	MOTION to Appear Pro Hac Vice for Tom H. Good (Fee Paid: $100, receipt number A26419091) Filed by Creditor Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)
08/21/2025	41 (20 pgs; 2 docs)	Notice *of Filing of Debtors' Demonstrative for Hearing on August 21, 2025*. Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - First Day Demonstrative) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	42 (2234 pgs; 24 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):22 Witness List, Exhibit List) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18 # 19 Exhibit 19 # 20 Exhibit 20 # 21 Exhibit 21 # 22 Exhibit 22 # 23 Exhibit 23) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	43 (5 pgs)	Notice of Appearance and Request for Notice Filed by Emma Fleming Filed by on behalf of Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)
08/21/2025	44 (33 pgs)	Certificate *of Service re First Day Hearing & Motions* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 4 Emergency Motion (with hearing date), 5 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 7 Emergency Motion (with hearing date), 8 Emergency Motion (with hearing date), 9 Emergency Motion (with hearing date), 12 Declaration, 14 Declaration, 15 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 17 Emergency Motion (with hearing date), 18 Emergency Motion (with hearing date), 19 Emergency Motion (with hearing date), 20 Emergency Motion (with hearing date), 22 Witness List, Exhibit List, 23 Notice, 27 Order for Joint Administration, 28 Initial Order Complex Chapter 11, 29 Agenda, 30 Order on Emergency Motion) (Gershbein, Evan) (Entered: 08/21/2025)
08/21/2025	45 (10 pgs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):16 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	46 (2 pgs)	Notice of Appearance and Request for Notice Filed by Julie Anne Parsons Filed by on behalf of Central Appraisal District of Taylor County, Reeves County Tax District, The County of Hays, Texas, County of Erath, The County of Denton, Texas, The County of Comal, Texas, Burnet Central Appraisal District, The County of Brazos, Texas (Parsons, Julie) (Entered: 08/21/2025)

08/21/2025	47 (7 pgs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):6 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	48 (84 pgs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):4 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	49 (1 pg)	Order Granting Motion for Emma Fleming To Appear pro hac vice (Related Doc # 38) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	50 (1 pg)	Order Granting Motion for Jonathan I. Levine To Appear pro hac vice (Related Doc # 39) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	51 (1 pg)	Order Granting Motion for Thomas H. Good To Appear pro hac vice (Related Doc # 40) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	52 (84 pgs)	Interim 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, Signed on 8/21/2025 (Related document(s):4 Emergency Motion (with hearing date)) **Hearing scheduled for 9/16/2025 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 08/21/2025)
08/21/2025	53 (12 pgs)	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 (Related Doc # 20), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	54 (3 pgs)	Order (A) Extending the Time to File Schedules and Statements and 2015.3 Reports; (B) Modifying the Requirement of Bankruptcy Local Rule 2015-3; and (C) Granting Related Relief (Related Doc # 18), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	55 (38 pgs)	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 (Related Doc # 5), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	56 (15 pgs)	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 (Related Doc # 8), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	57 (14 pgs)	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 (Related Doc # 7), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	58 (41 pgs)	Order (A) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (B) Granting Related Relief (Related Doc # 15), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	59 (10 pgs)	Interim 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, Signed on 8/21/2025 (Related document(s):16 Emergency Motion (with hearing date)) **Hearing scheduled for 9/16/2025 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 08/21/2025)
08/21/2025	60 (4 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 08/21/2025)
08/21/2025	61 (5 pgs)	Order (A) Authorizing Debtors to (I) Honor Their Prepetition Obligations to Customers, and (II) Continue Their Customer Programs; and (B) Granting Related Relief (Related Doc # 17), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	62 (56 pgs; 2 docs)	Proposed Order Submission After Hearing (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A (Redline)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	63 (4 pgs)	Certificate *of Service* (Filed By US Trustee). (Whitworth, Jana) (Entered: 08/21/2025)
08/21/2025	64 (7 pgs)	Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief, Signed on 8/21/2025 (Related document(s):6 Emergency Motion (with hearing date)) **Hearing scheduled for 9/16/2025 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 08/21/2025)
08/21/2025	65 (6 pgs)	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 (Related Doc # 9), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)

08/21/2025	66 (29 pgs)	Order Establishing (A) Bar Dates and Related Producers for Filing Proofs of Claim, (B) Approving the Form and Manner of Notice Thereof, and (C) Granting Related Relief (Related Doc # 19), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	67 (1 pg)	Courtroom Minutes. Time Hearing Held: 2:30 PM to 4:11 PM. Appearances: see log. Additional appearances: Matthew Dundon. Admitted Exhibits: ECF Nos.42-1, 42-23, 42-2 are admitted as direct testimony; 42-3 through 42-22. Complex Ch.11 first day hearing held. Oral argument heard on the record. Final orders have been signed and entered for motions 5, 7, 8, 9, 15, 17, 18, 19, and 20. The debtor is to submit a revised order for motion 19. Interim orders have been signed and entered for motions 4, 6, 16. The second day hearings are set for 9/16/2025 at 9:00 AM CST to be held by video conference. The objection deadline is 9/10/2025 at 5:00 PM CST.ERO: yes. (Related document(s):4 Emergency Motion (with hearing date), 5 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 7 Emergency Motion (with hearing date), 8 Emergency Motion (with hearing date), 9 Emergency Motion (with hearing date), 15 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 17 Emergency Motion (with hearing date), 18 Emergency Motion (with hearing date), 19 Emergency Motion (with hearing date), 20Emergency Motion (with hearing date)) (abh4) (Entered: 08/21/2025)
08/21/2025	68 (1 pg)	PDF with attached Audio File. Court Date & Time [8/21/2025 2:30:12 PM]. File Size [47922 KB]. Run Time [01:39:50]. (admin). (Entered: 08/21/2025)
08/21/2025	69 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the First Day Hearing held on August 21, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Trinity Transcription Services (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Trinity Transcription Services on 8/22/2025. Estimated completion date: 8/23/2025. Modified on 8/22/2025 (smg4). (Entered: 08/21/2025)
08/22/2025	70 (2 pgs)	Notice of Appearance and Request for Notice Filed by Gary David Bressler Filed by on behalf of Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties (Bressler, Gary) (Entered: 08/22/2025)
08/22/2025	71 (1 pg)	MOTION to Appear Pro Hac Vice for Virginia T. Shea, Esq. (Fee Paid: $100, receipt number A26422505) Filed by Creditor Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties (Bressler, Gary) (Main Document 71 replaced on 8/28/2025) (AkeitaHouse). (Entered: 08/22/2025)
08/22/2025	72 (3 pgs)	Notice of Appearance and Request for Notice Filed by Mollie Margaret Lerew Filed by on behalf of Wichita County (Lerew, Mollie) (Entered: 08/22/2025)
08/22/2025	73 (1 pg)	Notice of Appearance and Request for Notice Filed by John Kendrick Turner Filed by on behalf of Tarrant County, Dallas County (Turner, John) (Entered: 08/22/2025)

08/22/2025	74 (22 pgs)	Certificate *of Service re: 1) Debtors Amended Witness and Exhibit List; 2) [Proposed] Interim 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; 3) [Proposed] Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief; and 4) [Proposed] Interim 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):42 Witness List, Exhibit List, 45 Proposed Order, 47 Proposed Order, 48 Proposed Order) (Gershbein, Evan) (Entered: 08/22/2025)
08/23/2025	75 (22 pgs)	BNC Certificate of Mailing. (Related document(s):27 Order for Joint Administration) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	76 (6 pgs)	BNC Certificate of Mailing. (Related document(s):28 Initial Order Complex Chapter 11) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	77 (7 pgs)	BNC Certificate of Mailing. (Related document(s):30 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	78 (5 pgs)	BNC Certificate of Mailing. (Related document(s):32 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	79 (5 pgs)	BNC Certificate of Mailing. (Related document(s):33 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	80 (5 pgs)	BNC Certificate of Mailing. (Related document(s):34 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	81 (5 pgs)	BNC Certificate of Mailing. (Related document(s):35 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	82 (5 pgs)	BNC Certificate of Mailing. (Related document(s):36 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	83 (5 pgs)	BNC Certificate of Mailing. (Related document(s):37 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	84 (6 pgs)	BNC Certificate of Mailing. (Related document(s):49 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)

08/23/2025	85 (6 pgs)	BNC Certificate of Mailing. (Related document(s):50 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	86 (6 pgs)	BNC Certificate of Mailing. (Related document(s):51 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	87 (89 pgs)	BNC Certificate of Mailing. (Related document(s):52 Order Setting Hearing) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	88 (17 pgs)	BNC Certificate of Mailing. (Related document(s):53 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	89 (8 pgs)	BNC Certificate of Mailing. (Related document(s):54 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	90 (43 pgs)	BNC Certificate of Mailing. (Related document(s):55 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	91 (20 pgs)	BNC Certificate of Mailing. (Related document(s):56 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	92 (19 pgs)	BNC Certificate of Mailing. (Related document(s):57 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	93 (46 pgs)	BNC Certificate of Mailing. (Related document(s):58 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	94 (15 pgs)	BNC Certificate of Mailing. (Related document(s):59 Order Setting Hearing) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	95 (10 pgs)	BNC Certificate of Mailing. (Related document(s):61 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	96 (12 pgs)	BNC Certificate of Mailing. (Related document(s):64 Order Setting Hearing) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	97 (11 pgs)	BNC Certificate of Mailing. (Related document(s):65 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	98 (34 pgs)	BNC Certificate of Mailing. (Related document(s):66 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)

08/25/2025	99 (1 pg)	Notice of Appearance and Request for Notice Filed by Tara L Grundemeier Filed by on behalf of Galveston County, Houston Community College System, Fort Bend County, Texas City ISD, Lone Star College System, Cypress-Fairbanks ISD, Jefferson County, Montgomery County, Katy ISD (Grundemeier, Tara) (Entered: 08/25/2025)
08/25/2025	100 (2 pgs)	Notice of Appearance and Request for Notice Filed by Jeffrey Kurtzman Filed by on behalf of Keystone Quality Transport (Kurtzman, Jeffrey) (Entered: 08/25/2025)
08/25/2025	101 (1 pg)	Notice of Appearance and Request for Notice Filed by Don Stecker Filed by on behalf of Bexar County, City Of El Paso (Stecker, Don) (Entered: 08/25/2025)
08/26/2025	102 (311 pgs; 4 docs)	Notice *of Filing of Amended Interim DIP Order*. (Related document(s):4 Emergency Motion (with hearing date), 52 Order Setting Hearing) Filed by ModivCare Inc. (Attachments: # 1 Proposed Order (Ex. A) # 2 Exhibit B (Redline) # 3 Exhibit C (Changed-Page Only Redline)) (Davidson, Timothy) (Entered: 08/26/2025)
08/26/2025	103 (1 pg)	MOTION to Appear Pro Hac Vice for John A. Moe, II (Fee Paid: $100, receipt number A26431549) Filed by Creditor VXI Global Solutions, Inc. (Doherty, Casey) (Entered: 08/26/2025)
08/27/2025	104 (1 pg)	Order Granting Motion for John A. Moe, II To Appear pro hac vice (Related Doc # 103) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/27/2025. (abh4) (Entered: 08/27/2025)
08/27/2025	105 (1 pg)	Notice of Appearance and Request for Notice Filed by Tara L Grundemeier Filed by on behalf of Harris County ESD #09, Houston ISD, City of Houston, Harris County ESD #07, Harris County ESD #11, Harris County ESD #16 (Grundemeier, Tara) (Entered: 08/27/2025)
08/27/2025	106 (214 pgs)	Interim 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, Signed on 8/27/2025 (Related document(s):4 Emergency Motion (with hearing date), 102 Notice) (abh4) (Entered: 08/27/2025)
08/27/2025	107 (4 pgs)	Notice of Appearance and Request for Notice Filed by John A. Moe II Filed by on behalf of VXI Global Solutions, Inc. (Moe, John) (Entered: 08/27/2025)
08/28/2025	108 (1 pg)	Order Granting Motion for Virginia Shea To Appear pro hac vice (Related Doc # 71) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/28/2025. (abh4) (Entered: 08/28/2025)
08/28/2025	109 (2 pgs)	Notice of Appearance and Request for Notice Filed by Alysia Cordova Filed by on behalf of Taxing Districts Collected by Randall County, Taxing Districts Collected by Potter County, Childress County Appraisal

		District, Gray County Tax Office, Hale County Appraisal District, Hutchinson Count (Cordova, Alysia) (Entered: 08/28/2025)
08/28/2025	110 (4 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 08/28/2025)
08/29/2025	111 (3 pgs)	Notice of Appearance and Request for Notice Filed by Scott C Williams Filed by on behalf of Siriuspoint America Insurance Company (Williams, Scott) (Entered: 08/29/2025)
08/29/2025	112 (3 pgs)	Notice of Appearance and Request for Notice Filed by Scott C Williams Filed by on behalf of Atlantic Specialty Insurance Company (Williams, Scott) (Entered: 08/29/2025)
09/01/2025	113 (58 pgs)	Certificate *of Service re First Day Motions and Orders* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 12 Declaration, 14 Declaration, 16 Emergency Motion (with hearing date), 27 Order for Joint Administration, 28 Initial Order Complex Chapter 11, 30 Order on Emergency Motion, 52 Order Setting Hearing, 53 Order on Emergency Motion, 54 Order on Emergency Motion, 55 Order on Emergency Motion, 56 Order on Emergency Motion, 57 Order on Emergency Motion, 58 Order on Emergency Motion, 59 Order Setting Hearing, 61 Order on Emergency Motion, 64 Order Setting Hearing, 65 Order on Emergency Motion, 66 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/01/2025)
09/02/2025	114 (3 pgs)	Notice of Appearance and Request for Notice Filed by Brian John Wagner Filed by on behalf of Virginia Department of Medical Assistance Services (Wagner, Brian) (Entered: 09/02/2025)
09/03/2025	115 (1 pg)	Notice of Appearance and Request for Notice Filed by Don Stecker Filed by on behalf of Ector CAD (Stecker, Don) (Entered: 09/03/2025)
09/03/2025	116 (1 pg)	Notice of Appearance and Request for Notice Filed by John Kendrick Turner Filed by on behalf of City of Frisco, Gregg County, Tom Green CAD, Navarro County, City of Allen, Grayson County, Smith County, Stephenville ISD, Lewisville ISD, Allen ISD, Ellis County, City of Stephenville, Parker CAD (Turner, John) (Entered: 09/03/2025)
09/02/2025	117 (2 pgs)	Notice of Appearance and Request for Notice Filed by Linda D Reece Filed by on behalf of Frisco ISD, Plano ISD (anc4) (Entered: 09/04/2025)
09/04/2025	118 (5 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 09/04/2025)
09/04/2025	119 (64 pgs)	Chapter 11 Plan of Reorganization Filed by ModivCare Inc.. (Davidson, Timothy) (Entered: 09/04/2025)
09/04/2025	120 (175 pgs)	Disclosure Statement Filed by ModivCare Inc.. (Davidson, Timothy) (Entered: 09/04/2025)
09/04/2025	121 (78 pgs; 2 docs)	Transcript RE: FIRST DAY MOTIONS HEARING held on August 21, 2025 before Judge Alfredo Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with

		privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 12/3/2025. (Battaglia, Cheryl) (Entered: 09/04/2025)
09/04/2025	122 (290 pgs; 2 docs)	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 Forms 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* Filed by Debtor ModivCare Inc. Hearing scheduled for 10/6/2025 at 09:00 AM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/04/2025)
09/05/2025	123 (1 pg)	MOTION to Appear Pro Hac Vice for Sally B. Fox (Fee Paid: $100, receipt number A26458625) Filed by Attorney Sally B Fox (Fox, Sally) (Entered: 09/05/2025)
09/05/2025	124 (3 pgs)	Notice of Appointment of Creditors' Committee (Whitworth, Jana) (Entered: 09/05/2025)
09/05/2025	125 (2 pgs)	US Trustee's Notice *of Electronic Organizational Meeting of the Official Committee of Unsecured Creditors, to be held on Saturday, September 6, 2025, at 10:00 a.m. (CST)*. (Whitworth, Jana) (Entered: 09/05/2025)
09/05/2025	126 (27 pgs)	Certificate *of Service re: Notice of 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):55 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/05/2025)
09/05/2025	127 (14 pgs)	Certificate *of Service re: Interim 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):106 Generic Order) (Gershbein, Evan) (Entered: 09/05/2025)
09/05/2025	128 (269 pgs)	Certificate *of Service re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):64 Order Setting Hearing) (Gershbein, Evan) (Entered: 09/05/2025)
09/07/2025	129 (10 pgs)	BNC Certificate of Mailing. (Related document(s):121 Transcript) No. of Notices: 3. Notice Date 09/07/2025. (Admin.) (Entered: 09/07/2025)
09/08/2025	130 (1 pg)	Order Granting Motion for Sally B. Fox To Appear pro hac vice (Related Doc # 123) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/8/2025. (abh4) (Entered: 09/08/2025)

09/08/2025	131 (2 pgs)	Notice of Appearance and Request for Notice Filed by Hiram A Gutierrez Filed by on behalf of Brownsville Independent School District (Gutierrez, Hiram) (Entered: 09/08/2025)
09/08/2025	132 (1 pg)	MOTION to Appear Pro Hac Vice for Catherine Steege (Fee Paid: $100, receipt number A26463349) Filed by Debtor Uber Health, LLC (Steege, Catherine) (Entered: 09/08/2025)
09/08/2025	133 (4 pgs)	Notice of Appearance and Request for Notice Filed by Catherine L Steege Filed by on behalf of Uber Health, LLC (Steege, Catherine) (Entered: 09/08/2025)
09/09/2025	134 (2 pgs)	Notice of Appearance and Request for Notice Filed by Melissa E Valdez Filed by on behalf of PASADENA INDEPENDENT SCHOOL DISTRICT et al. (Valdez, Melissa) (Entered: 09/09/2025)
09/09/2025	135 (1 pg)	Order Granting Motion for Catherine Steege To Appear pro hac vice (Related Doc # 132) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/9/2025. (abh4) (Entered: 09/09/2025)
09/09/2025	136 (1 pg)	MOTION to Appear Pro Hac Vice for Melissa M. Root (Fee Paid: $100, receipt number A26465675) Filed by Debtor Uber Health, LLC (Root, Melissa) (Entered: 09/09/2025)
09/09/2025	137 (1 pg)	MOTION to Appear Pro Hac Vice for Stephenie Biernacki Anthony (Fee Paid: $100, receipt number A26467235) Filed by Creditor Deborah Slaughter (Anthony, Stephenie) (Entered: 09/09/2025)
09/05/2025	138 (2 pgs)	Notice of Appearance and Request for Notice Filed by William G. Wright Filed by on behalf of Tricare at Inspira, LLC (pns4) (Entered: 09/09/2025)
09/09/2025	139 (1 pg)	MOTION to Appear Pro Hac Vice for Annie Y. Stoops (Fee Paid: $100, receipt number A26467410) Filed by Creditor Genesys Cloud Services Inc (Stoops, Annie) (Entered: 09/09/2025)
09/09/2025	140 (1 pg)	MOTION to Appear Pro Hac Vice for Shannon W. Rieger (Fee Paid: $100, receipt number A26467510) Filed by Creditor Genesys Cloud Services Inc (Rieger, Shannon) (Entered: 09/09/2025)
09/09/2025	141 (3 pgs)	Affidavit Re: *Publication of the Notice of Chapter 11 Bankruptcy Case in The New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/09/2025)
09/09/2025	142 (3 pgs)	Affidavit Re: *Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in The New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):66 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/09/2025)
09/09/2025	143 (3 pgs)	Affidavit Re: *Publication of the Notice of the 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 in The New*

		York Times (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):55 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/09/2025)
09/10/2025	144 (1 pg)	Order Granting Motion for Melissa M. Root To Appear pro hac vice (Related Doc # 136) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	145 (1 pg)	Order Granting Motion for Stephenie Biernacki Anthony To Appear pro hac vice (Related Doc # 137) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	146 (1 pg)	Order Granting Motion for Annie Y. Stoops To Appear pro hac vice (Related Doc # 139) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	147 (1 pg)	Order Granting Motion for Shannon W. Rieger To Appear pro hac vice (Related Doc # 140) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	148 (4 pgs)	Notice of Appearance and Request for Notice Filed by Charles R. Koster Filed by on behalf of Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 09/10/2025)
09/11/2025	149 (1 pg)	MOTION to Appear Pro Hac Vice for J. Christopher Shore (Fee Paid: $100, receipt number A26471777) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Shore, Christopher) (Entered: 09/11/2025)
09/11/2025	150 (1 pg)	MOTION to Appear Pro Hac Vice for Gregory F. Pesce (Fee Paid: $100, receipt number A26471810) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Pesce, Gregory) (Entered: 09/11/2025)
09/11/2025	151 (1 pg)	MOTION to Appear Pro Hac Vice for Scott Greissman (Fee Paid: $100, receipt number A26471848) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Greissman, Scott) (Entered: 09/11/2025)
09/11/2025	152 (1 pg)	MOTION to Appear Pro Hac Vice for Andrew Zatz (Fee Paid: $100, receipt number A26471859) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Zatz, Andrew) (Entered: 09/11/2025)
09/11/2025	153 (5 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 09/11/2025)
09/11/2025	154 (10 pgs)	Certificate *of Service re: 1) Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; 2) Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 3) 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 Forms 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 (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date)) (Gershbein, Evan) (Entered: 09/11/2025)
09/11/2025	155 (4 pgs)	Certificate *of Service (Supplemental) re: First Day Motions and Orders* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 28 Initial Order Complex Chapter 11, 57 Order on Emergency Motion, 113 Certificate) (Gershbein, Evan) (Entered: 09/11/2025)
09/11/2025	156 (3 pgs)	Certificate *of Service (Supplemental) re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):64 Order Setting Hearing, 128 Certificate) (Gershbein, Evan) (Entered: 09/11/2025)
09/12/2025	157 (1 pg)	Order Granting Motion for John Christopher Shore To Appear pro hac vice (Related Doc # 149) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	158 (1 pg)	Order Granting Motion for Gregory F. Pesce To Appear pro hac vice (Related Doc # 150) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	159 (1 pg)	Order Granting Motion for Scott Greissman To Appear pro hac vice (Related Doc # 151) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	160 (1 pg)	Order Granting Motion for Andrew Zatz To Appear pro hac vice (Related Doc # 152) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	161 (3 pgs)	Notice *of Reset Hearing to Be Held on September 30, 2025, at 3:00 PM (Prevailing Central Time)*. (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 52 Order Setting Hearing, 59 Order Setting Hearing, 64 Order Setting Hearing, 106 Generic Order, Hearing (Bk) Cont) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/12/2025)
09/12/2025	162 (7 pgs)	Certificate *of Service (Supplemental) re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):64 Order Setting Hearing, 128 Certificate) (Gershbein, Evan) (Entered: 09/12/2025)

09/15/2025	163 (3 pgs)	Notice *of Reset Hearing to Be Held On September 30, 2025, at 4:00 p.m. (prevailing Central Time)*. (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 52 Order Setting Hearing, 59 Order Setting Hearing, 64 Order Setting Hearing, 106 Generic Order, 161 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/15/2025)
09/16/2025	164 (2 pgs)	Letter from ModivCare Inc. (bow4) (Entered: 09/16/2025)
09/15/2025	165 (10 pgs)	Document by Jim Alan Adams (dm4) (Entered: 09/16/2025)
09/16/2025	166 (21 pgs)	Stipulation By ModivCare Inc. and The Official Committee of Unsecured Creditors. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/16/2025)
09/16/2025	167 (8 pgs)	Stipulation By ModivCare Inc. and ACE American Insurance Company and Federal Insurance Company. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/16/2025)
09/17/2025	168 (3 pgs)	Notice of Appearance and Request for Notice Filed by Ricardo A Aguilar Filed by on behalf of Automotive Rentals, Inc. and ARI Fleet LT (Aguilar, Ricardo) (Entered: 09/17/2025)
09/17/2025	169 (1 pg)	MOTION to Appear Pro Hac Vice for Ricardo ("Richard") A. Aguilar (Fee Paid: $100, receipt number A26488414) Filed by Creditor Automotive Rentals, Inc. and ARI Fleet LT (Aguilar, Ricardo) (Entered: 09/17/2025)
09/17/2025	170 (3 pgs)	Notice of Appearance and Request for Notice Filed by Mark J. Chaney III Filed by on behalf of Automotive Rentals, Inc. and ARI Fleet LT (Chaney, Mark) (Entered: 09/17/2025)
09/17/2025	171 (1 pg)	MOTION to Appear Pro Hac Vice for Mark J. Chaney, III (Fee Paid: $100, receipt number A26488448) Filed by Creditor Automotive Rentals, Inc. and ARI Fleet LT (Chaney, Mark) (Entered: 09/17/2025)
09/17/2025	172 (2 pgs)	Letter from Michele Graham requesting paperwork (dah4) (Entered: 09/17/2025)
09/17/2025	173 (8 pgs)	Stipulation and Agreed Order Permitting the Ace Companies the Federal Companies to Each File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/17/2025 (Related document(s):167 Stipulation) (abh4) (Entered: 09/17/2025)
09/17/2025	174 (20 pgs)	Confidentiality Agreement and Stipulated Protective Order, Signed on 9/17/2025 (Related document(s):166 Stipulation) (abh4) (Entered: 09/17/2025)
09/17/2025	175 (1 pg)	Order Granting Motion for Ricardo "Richard" A. Aguilar To Appear pro hac vice (Related Doc # 169) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here**

		Signed on 9/17/2025. (abh4) (Main Document 175 replaced on 9/17/2025) (AkeitaHouse). (Entered: 09/17/2025)
09/17/2025	176 (1 pg)	Order Granting Motion for Mark J. Chaney, III To Appear pro hac vice (Related Doc # 171) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/17/2025. (abh4) (Entered: 09/17/2025)
09/17/2025	177 (59 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By A & B Homecare Solutions, L.L.C.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	178 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By A & B Homecare Solutions, L.L.C.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	179 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By A.E. Medical Alert, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	180 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By A.E. Medical Alert, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	181 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ABC Homecare LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	182 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ABC Homecare LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	183 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Aids Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	184 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Aids Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	185 (49 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Associate Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	186 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Associate Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	187 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro CGA Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	188 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro CGA Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	189 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Field Service Workers Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	190 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Field Service Workers Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	191 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Health Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	192 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Health Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	193 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services of Florida, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	194 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services of Florida, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	195 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services of New Jersey, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	196 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services of New Jersey, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	197 (61 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services of New York, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	198 (62 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services of New York, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	199 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	200 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	201 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Management and Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	202 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Management and Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	203 (48 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	204 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	205 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By AM Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	206 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By AM Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	207 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By AM Intermediate Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	208 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By AM Intermediate Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	209 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Arsens Home Care, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	210 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Arsens Home Care, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	211 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ARU Hospice Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	212 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ARU Hospice Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	213 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Associated Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	214 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Associated Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	215 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By At-Home Quality Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	216 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By At-Home Quality Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	217 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Auditory Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	218 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Auditory Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	219 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Barney's Medical Alert-ERS, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	220 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Barney's Medical Alert-ERS, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	221 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By California MedTrans Network IPA LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	222 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By California MedTrans Network IPA LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	223 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By California MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	224 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By California MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	225 (69 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Care Finders Total Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	226 (58 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Care Finders Total Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	227 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers Alliance, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	228 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers Alliance, LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	229 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Home Health Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	230 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Home Health Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	231 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Medical Staffing, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	232 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Medical Staffing, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	233 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Medical Supply, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	234 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Medical Supply, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	235 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Registry, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	236 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Registry, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	237 (66 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Caregivers America, LLC.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	238 (56 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Caregivers America, LLC.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	239 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-

		Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Caregivers On Call, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	240 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Caregivers On Call, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	241 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CGA Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	242 (54 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CGA Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	243 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CGA Staffing Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	244 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CGA Staffing Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	245 (72 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Circulation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	246 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Circulation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	247 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Florida MedTrans Network LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	248 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Florida MedTrans Network LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	249 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Florida MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	250 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Florida MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	251 (62 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Guardian Medical Monitoring, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	252 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Guardian Medical Monitoring, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	253 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Health Trans, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	254 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Health Trans, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	255 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Healthcom Holdings LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	256 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Healthcom Holdings LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	257 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Healthcom, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	258 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Healthcom, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	259 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Helping Hand Home Health Care Agency Inc). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	260 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Helping Hand Home Health Care Agency Inc). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	261 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Helping Hand Hospice, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	262 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Helping Hand Hospice, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	263 (49 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi Care Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	264 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi Care Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	265 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	266 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	267 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi SH Holdings Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	268 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi SH Holdings Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	269 (57 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi SH LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	270 (55 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi SH LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	271 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Independence Healthcare Corporation). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	272 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Independence Healthcare Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	273 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Metropolitan Medical Transportation IPA, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	274 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Metropolitan Medical Transportation IPA, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	275 (48 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By MLA Sales, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	276 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By MLA Sales, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	277 (938 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	278 (65 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	279 (783 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ModivCare Solutions, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	280 (15 pgs; 2 docs)	Emergency Motion / *Emergency Motion and Notice of Debtors to Authorize Payments in Excess of Interim Cap Under Interim Critical Vendor Order* Filed by Debtor ModivCare Inc. Hearing scheduled for 9/18/2025 at 03:00 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	281 (101 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ModivCare Solutions, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	282 (57 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Multicultural Home Care Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	283 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Multicultural Home Care Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	284 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By National MedTrans, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	285 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By National MedTrans, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	286 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By New England Emergency Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	287 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By New England Emergency Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	288 (5 pgs)	Declaration re: */ Declaration of Chad J. Shandler in Support of the Emergency Motion and Notice of Debtors to Authorize Payments in Excess of Interim Cap Under Interim Critical Vendor Order* (Filed By ModivCare Inc.).(Related document(s):280 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	289 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By OEP AM, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	290 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By OEP AM, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	291 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Panhandle Support Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	292 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Panhandle Support Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	293 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Personal In-Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	294 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Personal In-Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	295 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Philadelphia Home Care Agency, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	296 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Philadelphia Home Care Agency, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	297 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Provado Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	298 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Provado Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	299 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Red Top Transportation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	300 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Red Top Transportation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	301 (60 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Ride Plus, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	302 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Ride Plus, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	303 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Safe Living Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	304 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Safe Living Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	305 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Secura Home Health Holdings, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	306 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Secura Home Health Holdings, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	307 (4 pgs)	Notice *of Emergency Virtual Hearing on Emergency Motion and Notice of Debtors to Authorize Payments in Excess of Interim Cap Under Interim Critical Vendors Order*. (Related document(s):280 Emergency Motion (with hearing date)) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	308 (49 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Secura Home Health, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	309 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Secura Home Health, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	310 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Socrates Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	311 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Socrates Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	312 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By TriMed, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	313 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By TriMed, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	314 (235 pgs; 4 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):280 Emergency Motion (with hearing date), 307 Notice) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3) (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	315 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule

		H Non-Individual- Codebtors (Filed By Union Home Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	316 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Union Home Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	317 (92 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Valued Relationships, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	318 (205 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Valued Relationships, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	319 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Victory Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	320 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Victory Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	321 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By VRI Intermediate Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	322 (54 pgs)	Statement of Financial Affairs for Non-Individual (Filed By VRI Intermediate Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	323 (4 pgs)	Agenda for Hearing on 9/18/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	324 (10 pgs)	Notice *of Filing of Periodic Report Pursuant to Federal Rule of Bankruptcy Procedure 2015.3*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/17/2025)
09/18/2025	325 (5 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	326 (20 pgs)	Certificate *of Service re: Notice of Reset Hearing to be Held on September 30, 2025, at 3:00 p.m. (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):161 Notice) (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	327 (20 pgs)	Certificate *of Service re: Notice of Reset Hearing to be Held on September 30, 2025, at 4:00 p.m. (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):163 Notice) (Gershbein, Evan) (Entered: 09/18/2025)

09/18/2025	328 (9 pgs)	Certificate *of Service re: Documents Served on September 17, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):280 Emergency Motion (with hearing date), 288 Declaration, 307 Notice, 314 Witness List, Exhibit List, 323 Agenda, 324 Notice) (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	329 (2 pgs)	Notice of Appearance and Request for Notice Filed by Jason A. Starks Filed by on behalf of Travis County (Starks, Jason) (Entered: 09/18/2025)
09/18/2025	330 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc.. This is to order a transcript of Emergency Hearing, September 18, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bell, Brandon) Electronically forwarded to Judicial Transcribers of Texas on 9/18/2025. Estimated completion date: 9/19/2025. Modified on 9/18/2025 (smg4). (Entered: 09/18/2025)
09/18/2025	331 (1 pg)	Courtroom Minutes. Time Hearing Held: 3:00 PM to 3:26 PM. Appearances: see log. Additional appearances: Matt Warren. Admitted Exhibits: ECF Nos.314-3. Emergency motion hearing held. Oral argument heard on the record. Parties will work together to agree on the language for the proposed order. If an agreement cannot be reached, each party may submit a separate proposed order for the Courts review. All proposed orders must be filed by 9:00 AM CST on 9/19/2025. Parties should notify the Case Manager that the submission has been made. ERO: yes. (Related document(s):280 Emergency Motion (with hearing date)) (abh4) (Entered: 09/18/2025)
09/18/2025	332 (1 pg)	PDF with attached Audio File. Court Date & Time [9/18/2025 3:00:06 PM]. File Size [12537 KB]. Run Time [00:26:07]. (admin). (Entered: 09/18/2025)
09/18/2025	333 (8 pgs; 2 docs)	Proposed Order Submission After Hearing (Filed By ModivCare Inc.). (Related document(s):280 Emergency Motion (with hearing date)) (Attachments: # 1 Exhibit A (Redline)) (Davidson, Timothy) (Entered: 09/18/2025)
09/18/2025	334 (3 pgs)	Order Authorizing Debtors to Make Payments in Excess of Interim Cap Under Interim Critical Vendor Order (Related Doc # 280) Signed on 9/18/2025. (tjl4) (Entered: 09/18/2025)
09/18/2025	335 (17 pgs; 2 docs)	Motion */ Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/18/2025)
09/18/2025	336 (27 pgs; 2 docs)	Motion */ Motion of Debtors for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/18/2025)
09/18/2025	337 (20 pgs; 2 docs)	Omnibus Motion to Reject Lease or Executory Contract */ Debtors' Omnibus Motion for Entry of an Order Authorizing the Debtors to (A) Reject Certain Unexpired Leases and (B) Abandon Certain Remaining Personal Property in Connection Therewith* Filed by Debtor

		ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/18/2025)
09/19/2025	338 (79 pgs; 4 docs)	Application to Employ Latham & Watkins LLP as Bankruptcy Co-Counsel. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Klidonas Declaration) # 2 Exhibit B (Retention Declaration) # 3 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	339 (60 pgs; 4 docs)	Application to Employ Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Davidson Declaration) # 2 Exhibit B (Engagement Letter) # 3 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	340 (96 pgs; 3 docs)	Application to Employ Moelis & Company LLC as Investment Banker and Placement Agent. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Jamal Declaration) # 2 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	341 (81 pgs; 3 docs)	Application to Employ FTI Consulting, Inc. as Financial Advisor. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Shandler Declaration) # 2 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	342 (216 pgs; 3 docs)	Application to Employ Ernst & Young LLP as Tax, Consulting, Accounting, and Valuation Services Provider. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Lazzeri Declaration) # 2 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	343 (1 pg)	Notice of Appearance and Request for Notice Filed by Diane Wade Sanders Filed by on behalf of San Marcos CISD, Hays CISD, McLennan County, City Of McAllen, Hidalgo County, Cameron County, Nueces County (Sanders, Diane) (Entered: 09/19/2025)
09/22/2025	344 (1 pg)	MOTION to Appear Pro Hac Vice for Jamie L. Wine (Fee Paid: $100, receipt number A26501385) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 09/22/2025)
09/23/2025	345 (1 pg)	Order Granting Motion for Jamie Wine To Appear pro hac vice (Related Doc # 344) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/23/2025. (abh4) (Entered: 09/23/2025)
09/23/2025	346 (123 pgs)	Objection *of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion* (related document(s):4 Emergency Motion (with hearing date)). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 09/23/2025)
09/23/2025	347 (3 pgs)	Notice *of Reset Hearing to be Held on September 30, 2025, at 3:00 p.m. (Prevailing Central Time)*. (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 52 Order Setting Hearing, 59 Order Setting Hearing, 64 Order Setting Hearing, 106 Generic

		Order, 161 Notice, 163 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/23/2025)
09/23/2025	348 (3 pgs)	Notice *of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/23/2025)
09/23/2025	349 (1 pg)	Sealed Document / *Declaration of David MacGreevey in Support of the Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 09/23/2025)
09/23/2025	350 (30 pgs)	Notice *of Filing of (I) Liquidation Analysis, (II) Financial Projections, and (III) Valuation Analysis With Respect to Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):120 Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/23/2025)
09/23/2025	351 (8 pgs)	Certificate *of Service re: Order Authorizing Debtors to Make Payments in Excess of Interim Cap Under Interim Critical Vendor Order* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):334 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/23/2025)
09/23/2025	352 (13 pgs)	Certificate *of Service re: 1) Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals; 2) Motion of Debtors for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business; and 3) Debtors Omnibus Motion for Entry of an Order Authorizing the Debtors to (A) Reject Certain Unexpired Leases and (B) Abandon Certain Remaining Personal Property in Connection Therewith* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):335 Generic Motion, 336 Generic Motion, 337 Motion to Reject Lease or Executory Contract) (Gershbein, Evan) (Entered: 09/23/2025)
09/24/2025	353 (3050 pgs)	Certificate *of Service re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/24/2025)
09/24/2025	354 (3043 pgs)	Certificate *of Service re: Notice of Hearing to Consider Approval of the Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):122 Emergency Motion (with hearing date)) (Gershbein, Evan) (Entered: 09/24/2025)
09/24/2025	355 (9 pgs)	Certificate *of Service re: Documents Served on September 19, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):338 Application to Employ, 339 Application to Employ, 340 Application to Employ, 341 Application to Employ, 342 Application to Employ) (Gershbein, Evan) (Entered: 09/24/2025)

09/24/2025	356 (6 pgs)	Stipulation By ModivCare Inc. and Wilmington Savings Fund Society, FSB. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/24/2025)
09/25/2025	357 (1 pg)	MOTION to Appear Pro Hac Vice for Jason N. Zakia (Fee Paid: $100, receipt number A26509321) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Zakia, Jason) (Entered: 09/25/2025)
09/25/2025	358 (6 pgs)	Stipulation and Agreed Order Permitting Wilmington Savings Fund Society, FSB, as the Unsecured Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/25/2025 (Related document(s):66 Order on Emergency Motion, 356 Stipulation) (abh4) (Entered: 09/25/2025)
09/25/2025	359 (6 pgs)	Stipulation By ModivCare Inc. and JPMorgan Chase Bank, N.A. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/25/2025)
09/25/2025	360 (6 pgs)	Stipulation By ModivCare Inc. and Ankura Trust Company, LLC. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/25/2025)
09/25/2025	361 (25 pgs; 3 docs)	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* (Filed By ModivCare Inc.).(Related document(s):16 Emergency Motion (with hearing date), 59 Order Setting Hearing) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 09/25/2025)
09/25/2025	362 (72 pgs; 2 docs)	Application to Employ Quinn Emanuel Urquhart & Sullivan, LLP as Counsel to the Special Committee of the Debtors. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 09/25/2025)
09/26/2025	363 (1 pg)	Order Granting Motion for Jason N. Zakia To Appear pro hac vice (Related Doc # 357) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/26/2025. (abh4) (Entered: 09/26/2025)
09/26/2025	364 (19 pgs; 19 docs)	Sealed Document , Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18) (Davidson, Timothy) (Entered: 09/26/2025)

09/26/2025	365 (5 pgs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 09/26/2025)
09/26/2025	366 (2146 pgs; 19 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):364 Sealed Document, Witness List, Exhibit List) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 (Filed Under Seal) # 17 Exhibit 17 (Filed Under Seal) # 18 Exhibit 18 (Filed Under Seal)) (Davidson, Timothy) (Entered: 09/26/2025)
09/26/2025	367 (2 pgs)	Creditor Request for Notices (Filed By Wick Companies LLC). (Lemkin, Joseph) (Entered: 09/26/2025)
09/26/2025	368 (1 pg)	Notice of Appearance and Request for Notice Filed by Stephen R. Butler Filed by on behalf of TN Dept of Revenue (Butler, Stephen) (Entered: 09/26/2025)
09/26/2025	369 (23 pgs; 2 docs)	Transcript RE: Motion Hearing held on September 18, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 12/29/2025. (mhen) (Entered: 09/26/2025)
09/26/2025	370 (884 pgs; 7 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 7) (Koster, Charles) (Entered: 09/26/2025)
09/26/2025	371 (1 pg)	MOTION to Appear Pro Hac Vice for Jacorius J. Williams (Fee Paid: $100, receipt number A26514817) Filed by Creditor ROC II Fairlead Gran Park Avenues LLC (Williams, Jacorius) (Entered: 09/26/2025)
09/26/2025	372 (14 pgs; 14 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for Hearing Scheduled for September 30, 2025, at 3:00 p.m. (Prevailing Central Time) (Sealed Exhibits)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 6 # 2 Exhibit 8 # 3 Exhibit 9 # 4 Exhibit 10 # 5 Exhibit 11 # 6 Exhibit 12 # 7 Exhibit 13 # 8 Exhibit 14 # 9 Exhibit 15 # 10 Exhibit 16 # 11 Exhibit 17 # 12 Exhibit 18 # 13 Exhibit 19) (Koster, Charles) (Entered: 09/26/2025)
09/26/2025	373 (21 pgs)	Certificate *of Service re: 1) Notice of Reset Hearing to be Held on September 30, 2025, at 3:00 p.m. (Prevailing Central Time); 2) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology; and 3) Notice of Filing of (I) Liquidation Analysis, (II) Financial Projections, and (III) Valuation Analysis with Respect to Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):347 Notice, 348 Notice, 350 Notice) (Gershbein, Evan) (Entered: 09/26/2025)

09/28/2025	374 (12 pgs)	BNC Certificate of Mailing. (Related document(s):369 Transcript) No. of Notices: 79. Notice Date 09/28/2025. (Admin.) (Entered: 09/28/2025)
09/29/2025	375 (1 pg)	Order Granting Motion for Jacorius J. Williams To Appear pro hac vice (Related Doc # 371) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/29/2025. (abh4) (Entered: 09/29/2025)
09/29/2025	376 (19 pgs; 3 docs)	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* (Filed By ModivCare Inc.).(Related document(s):6 Emergency Motion (with hearing date), 64 Order Setting Hearing, 334 Order on Emergency Motion) (Attachments: # 1 Exhibit A (Revised Proposed Final Critical Vendors Order) # 2 Exhibit B (Redline)) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	377 (203 pgs; 6 docs)	Reply */ Debtors' Reply to Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion* (related document(s):4 Emergency Motion (with hearing date)). Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Proposed Order # 2 Exhibit B - Redline # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	378 (24 pgs)	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* (related document(s):4 Emergency Motion (with hearing date)). Filed by First Lien Agent, Consenting Creditors, and DIP Lenders (Warren, Matthew) (Entered: 09/29/2025)
09/29/2025	379 (4 pgs)	Witness List (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) (Entered: 09/29/2025)
09/29/2025	380 (5 pgs)	Notice of Appearance and Request for Notice Filed by Andrew D. Behlmann Filed by on behalf of Proposed Lead Plaintiff and the Proposed Class (Behlmann, Andrew) (Entered: 09/29/2025)
09/23/2025	381 (1 pg)	Letter from John W Behnken Jr (cng4) (Entered: 09/29/2025)
09/29/2025	382 (28 pgs)	Objection *Of Proposed Lead Plaintiff To The Disclosure Statement And Solicitation Procedures Related To The Joint Chapter 11 Plan Of Reorganization Of Modivcare Inc. And Its Debtor Affiliates* (related document(s):122 Emergency Motion (with hearing date)). Filed by Proposed Lead Plaintiff and the Proposed Class (Behlmann, Andrew) (Entered: 09/29/2025)
09/29/2025	383 (33 pgs)	Statement */ Exhibit A to Objection Of Proposed Lead Plaintiff To The Disclosure Statement And Solicitation Procedures Related To The Joint Chapter 11 Plan Of Reorganization Of Modivcare Inc. And Its Debtor Affiliates* (Filed By Proposed Lead Plaintiff and the Proposed Class).

		(Related document(s):382 Objection) (Behlmann, Andrew) (Entered: 09/29/2025)
09/29/2025	384 (3 pgs)	Notice of Appearance and Request for Notice Filed by Jacorius Williams Filed by on behalf of ROC II Fairlead Gran Park Avenues LLC (Williams, Jacorius) (Entered: 09/29/2025)
09/29/2025	385 (169 pgs; 2 docs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order, 377 Reply) (Attachments: # 1 Redline) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	386 (6 pgs)	Stipulation and Agreed Order Permitting the First Lien Administrative Agent to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/29/2025 (Related document(s):66 Order on Emergency Motion, 359 Stipulation) (abh4) (Entered: 09/29/2025)
09/29/2025	387 (6 pgs)	Stipulation and Agreed Order Permitting Ankura Trust Company, LLC, as the Second Lien Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/29/2025 (Related document(s):66 Order on Emergency Motion, 360 Stipulation) (abh4) (Entered: 09/29/2025)
09/29/2025	388 (11 pgs)	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, Signed on 9/29/2025 (Related document(s):16 Emergency Motion (with hearing date), 59 Order Setting Hearing) (abh4) (Entered: 09/29/2025)
09/29/2025	389 (6 pgs)	Stipulation By ModivCare Inc. and Humana, Inc., Humana Military, Humana Insurance Company of Florida, Humana Health Benefit Plan of South Carolina, Humana Wisconsin Health Organization, and their affiliates. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	390 (5 pgs)	Agenda for Hearing on 9/30/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	391 (11 pgs)	Certificate *of Service re: 1) Debtors Application for Entry of an Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee of the Debtors Effective as of September 15, 2025; and 2) Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):362 Application to Employ, 366 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 09/29/2025)
09/29/2025	392 (6 pgs)	Certificate *of Service re: Agenda of Debtors for Matters Set for Hearing on September 30, 2025* (Filed By Kurtzman Carson

		Consultants, LLC d/b/a Verita Global).(Related document(s):390 Agenda) (Gershbein, Evan) (Entered: 09/29/2025)
09/29/2025	393 (3 pgs)	Notice *of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/29/2025)
09/30/2025	394 (7 pgs)	Final Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (B) Granting Related Relief, Signed on 9/30/2025 (Related document(s):6 Emergency Motion (with hearing date), 64 Order Setting Hearing) (abh4) (Entered: 09/30/2025)
09/30/2025	395 (6 pgs)	Stipulation and Agreed Order Permitting Humana Inc. and Its Subsidiaries to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/30/2025 (Related document(s):66 Order on Emergency Motion, 389 Stipulation) (abh4) (Entered: 09/30/2025)
09/30/2025	396 (1 pg)	MOTION to Appear Pro Hac Vice for Charles Craig Eller (Fee Paid: $100, receipt number A26521828) Filed by Creditor Miami Lakes Center, LLC (Eller, Charles) (Entered: 09/30/2025)
09/30/2025	397 (31 pgs)	Response/Objection Filed by US Trustee. (Related document(s):122 Emergency Motion (with hearing date)) (Whitworth, Jana) (Entered: 09/30/2025)
09/30/2025	398 (11 pgs; 2 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors).(Related document(s):370 Witness List, Exhibit List, 372 Sealed Document) (Attachments: # 1 Exhibit 20) (Koster, Charles) (Entered: 09/30/2025)
09/30/2025	399 (1 pg)	Order Granting Motion for Charles Craig Eller To Appear pro hac vice (Related Doc # 396) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/30/2025. (abh4) (Entered: 09/30/2025)
09/30/2025	400 (279 pgs)	Certificate *(Supplemental) re 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 122 Emergency Motion (with hearing date)) (Gershbein, Evan) (Entered: 09/30/2025)
09/30/2025	401 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Hearing held on September 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/1/2025. Estimated completion date: 10/2/2025. Modified on 10/1/2025 (sew4). (Entered: 09/30/2025)
09/30/2025	402 (1 pg)	Courtroom Minutes. Time Hearing Held: 3:01 pm - 4:36 pm, 6:33 pm - 8:34 pm. Appearances: See attached. Additional appearances: Ray Schrock and Tad Davidson. Witnesses sworn in and testimony given: Chad Shandler, Zul Jamal, David MacGreevey. Exhibits admitted: ECF Nos. 364-3 through 364-9, 364-11 through 364-18; 398-1, 398-4, 398-5,

		398-7 through 398-20, Committees Exhibit 21 January 2025 Projections, Exhibit 23, Exhibit 24. Oral argument heard. Hearing continued to 10/3/25 at 12:00 pm. (Related document(s):4 Emergency Motion (with hearing date)) **Hearing scheduled for 10/3/2025 at 12:00 PM at telephone and video conference.** (tjl4) (Entered: 09/30/2025)
09/30/2025	403 (1 pg)	PDF with attached Audio File. Court Date & Time [9/30/2025 3:01:31 PM]. File Size [45629 KB]. Run Time [01:35:04]. (admin). (Entered: 09/30/2025)
09/30/2025	404 (1 pg)	PDF with attached Audio File. Court Date & Time [9/30/2025 6:33:54 PM]. File Size [56647 KB]. Run Time [01:58:01]. (admin). (Entered: 09/30/2025)
09/30/2025	405 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order Permitting Wilmington Savings Fund Society, FSB, as the Unsecured Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):358 Generic Order) (Gershbein, Evan) (Entered: 09/30/2025)
09/30/2025	406 (34 pgs)	Certificate *of Service (Supplemental) re: 1) Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief; 2) Notice of Hearing to Consider Approval of the Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; 3) Notice of Chapter 11 Bankruptcy Case; 4) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 5) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 122 Emergency Motion (with hearing date), 128 Certificate, 353 Certificate, 354 Certificate) (Gershbein, Evan) (Entered: 10/01/2025)
10/01/2025	407 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Paul Hastings LLP. This is to order a transcript of September 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Veritext Legal Solutions (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/1/2025. Estimated completion date: 10/2/2025. Modified on 10/1/2025 (sew4). (Entered: 10/01/2025)
10/01/2025	408 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the September 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/1/25. Estimated completion date: 10/2/2025. Modified on 10/1/2025 (sew4). (Entered: 10/01/2025)
10/01/2025	409 (32 pgs; 2 docs)	Motion *Of Securities Litigation Proposed Lead Plaintiff For Entry Of An Order (I) Authorizing Proposed Lead Plaintiff To Opt Out Of Third-Party Release On Behalf Of The Proposed Class Or Confirming Such Authority Or, Alternatively, (II) Certifying The Proposed Class For A Limited Purpose* Filed by Interested Party Proposed Lead Plaintiff and

		the Proposed Class (Attachments: # 1 Exhibit A - Proposed Order) (Behlmann, Andrew) (Entered: 10/01/2025)
10/01/2025	410 (2 pgs)	Creditor Request for Notices (Filed By Oracle America, Inc.). (Christianson, Shawn) (Entered: 10/01/2025)
10/01/2025	411 (6 pgs)	Certificate *of Service* (Filed By Proposed Lead Plaintiff and the Proposed Class).(Related document(s):409 Generic Motion) (Behlmann, Andrew) (Entered: 10/01/2025)
10/01/2025	412 (9 pgs; 2 docs)	Motion to Extend Time *for Debtors to Comply with Section 345(b) of the Bankruptcy Code* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/01/2025)
10/01/2025	413 (17 pgs)	BNC Certificate of Mailing. (Related document(s):386 Generic Order) No. of Notices: 79. Notice Date 10/01/2025. (Admin.) (Entered: 10/01/2025)
10/01/2025	414 (17 pgs)	BNC Certificate of Mailing. (Related document(s):387 Generic Order) No. of Notices: 79. Notice Date 10/01/2025. (Admin.) (Entered: 10/01/2025)
10/01/2025	415 (22 pgs)	BNC Certificate of Mailing. (Related document(s):388 Generic Order) No. of Notices: 79. Notice Date 10/01/2025. (Admin.) (Entered: 10/01/2025)
10/01/2025	416 (185 pgs)	Exhibit Regarding Claim by Excel Medical Transportation LLC (amp4) (Entered: 10/02/2025)
10/01/2025	417 (188 pgs)	Exhibit Regarding Claim by Excel Medical Transportation LLC (amp4) (Entered: 10/02/2025)
10/01/2025	418 (146 pgs)	Exhibit Regarding Claim by Excel Medical Transportation LLC (amp4) (Entered: 10/02/2025)
10/02/2025	419 (3 pgs)	Notice of Appearance and Request for Notice Filed by Benjamin Todd Trotter Filed by on behalf of Dimmit County (Trotter, Benjamin) (Entered: 10/02/2025)
10/02/2025	420 (1 pg)	MOTION to Appear Pro Hac Vice for Erin Smith (Fee Paid: $100, receipt number A26530906) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/02/2025)
10/02/2025	421 (22 pgs)	Objection *of The Official Committee of Unsecured Creditors to the Debtors Emergency Motion for Approval of the Disclosure Statement and Related Solicitation Procedures* (related document(s):122 Emergency Motion (with hearing date)). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/02/2025)

10/02/2025	422 (118 pgs)	Declaration re: */ Declaration of Erin M. Smith In Support of the Objection of The Official Committee of Unsecured Creditors to the Debtors' Emergency Motion for Approval of the Disclosure Statement and Related Solicitation Procedures* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):421 Objection) (Koster, Charles) (Entered: 10/02/2025)
10/02/2025	423 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 10/02/2025)
09/29/2025	424 (8 pgs)	Marriage and Death Certificate by Dianne Clark (dah4) (Entered: 10/02/2025)
10/02/2025	425 (3 pgs)	Motion to Withdraw as Attorney. Objections/Request for Hearing Due in 21 days. Filed by Creditor ROC II Fairlead Gran Park Avenues LLC (Williams, Jacorius) (Entered: 10/02/2025)
10/02/2025	426 (181 pgs; 2 docs)	Transcript RE: Motion Hearing held on September 30, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 12/31/2025. (mhen) (Entered: 10/02/2025)
10/02/2025	427 (21 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Permitting the First Lien Administrative Agent to File a Consolidated Proof of Claim Under a Single Case Number; 2) Stipulation and Agreed Order Permitting Ankura Trust Company, LLC, as the Second Lien Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number; and 3) 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):386 Generic Order, 387 Generic Order, 388 Generic Order) (Gershbein, Evan) (Entered: 10/02/2025)
10/03/2025	428 (1 pg)	Order Granting Motion for Erin Smith To Appear pro hac vice (Related Doc # 420) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/3/2025. (abh4) (Entered: 10/03/2025)
10/03/2025	429 (9 pgs)	Notice *of Unresolved Issues Regarding Entry of Final DIP Order in Advance of Continued Final DIP Hearing*. (Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order, 346 Objection, 377 Reply, 378 Reply, 402 Courtroom Minutes) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	430 (443 pgs; 10 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9) (Davidson, Timothy) (Entered: 10/03/2025)

10/03/2025	431 (124 pgs; 2 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1) (Koster, Charles) (Entered: 10/03/2025)
10/03/2025	432 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Hearing held on October 3, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/3/2025. Estimated completion date: 10/4/2025. Modified on 10/3/2025 (sew4). (Entered: 10/03/2025)
10/03/2025	433 (1 pg)	USB Exhibit Relating to Proof of Claim by Lalla Nabila Azallali El Idissi (cak4) (Entered: 10/03/2025)
10/03/2025	434 (1 pg)	Courtroom Minutes. Time Hearing Held: 12:00 pm - 12:30 pm. Appearances: See attached. The Court heard oral argument. Revised form of order to be filed by counsel for the motion with a redline as stated on the record. (Related document(s):4 Emergency Motion (with hearing date)) (tjl4) (Entered: 10/03/2025)
10/03/2025	435 (5 pgs)	Witness List, Exhibit List (Filed By Proposed Lead Plaintiff and the Proposed Class).(Related document(s):382 Objection) (Behlmann, Andrew) (Entered: 10/03/2025)
10/03/2025	436 (2 pgs)	Certificate *of Service* (Filed By Proposed Lead Plaintiff and the Proposed Class).(Related document(s):435 Witness List, Exhibit List) (Behlmann, Andrew) (Entered: 10/03/2025)
10/03/2025	437 (1 pg)	PDF with attached Audio File. Court Date & Time [10/3/2025 12:01:36 PM]. File Size [13858 KB]. Run Time [00:28:52]. (admin). (Entered: 10/03/2025)
10/03/2025	438 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by First Lien Parties. This is to order a transcript of October 3, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/7/2025. Estimated completion date: 10/8/2025. Modified on 10/7/2025 (anc4). (Entered: 10/03/2025)
10/03/2025	439 (2 pgs; 2 docs)	Sealed Document | *Motion of Debtors For Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	440 (23 pgs; 2 docs)	Redacted Document By ModivCare Inc.. The unredacted document will be filed under seal in paper with the Clerk. (Filed By ModivCare Inc.). (Related document(s):439 Sealed Document) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	441 (7 pgs; 2 docs)	Motion to Seal | *Debtors' Motion to Seal Exhibit to Motion of Debtors For Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC*

		and (B) Granting Related Relief Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	442 (22 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 1, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 55 Order on Emergency Motion, 66 Order on Emergency Motion, 122 Emergency Motion (with hearing date), 126 Certificate, 128 Certificate, 353 Certificate, 354 Certificate) (Gershbein, Evan) (Entered: 10/03/2025)
10/04/2025	443 (293 pgs)	Certificate *of Service re: 1) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology; 2) Final Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (B) Granting Related Relief; and 3) Stipulation and Agreed Order Permitting Humana Inc. and its Subsidiaries to File a Consolidated Proof of Claim Under a Single Case Number* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):393 Notice, 394 Generic Order, 395 Generic Order) (Gershbein, Evan) (Entered: 10/04/2025)
10/04/2025	444 (12 pgs)	Certificate *of Service re: Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):430 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 10/04/2025)
10/04/2025	445 (66 pgs)	First Amended Chapter 11 Plan Filed by ModivCare Inc.. (Related document(s):119 Chapter 11 Plan) (Davidson, Timothy) (Entered: 10/04/2025)
10/04/2025	446 (141 pgs)	Amended Disclosure Statement Filed by ModivCare Inc.. (Related document(s):120 Disclosure Statement) (Davidson, Timothy) (Entered: 10/04/2025)
10/04/2025	447 (363 pgs)	Notice *of Filing of (I) First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates; and (II) Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date), 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/04/2025)
10/05/2025	448 (27 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):122 Emergency Motion (with hearing date), 382 Objection, 397 Response/Objection, 421 Objection) (Davidson, Timothy) (Entered: 10/05/2025)
10/05/2025	449 (13 pgs)	BNC Certificate of Mailing. (Related document(s):426 Transcript) No. of Notices: 81. Notice Date 10/05/2025. (Admin.) (Entered: 10/05/2025)
10/05/2025	450 (572 pgs)	Notice *of Filing of Revised Proposed 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 Forms 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. (Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date), 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/05/2025)
10/05/2025	451 (245 pgs)	Proposed Order RE: *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 Forms 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* (Filed By ModivCare Inc.).(Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date), 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) (Davidson, Timothy) (Entered: 10/05/2025)
10/05/2025	452 (14 pgs)	Notice *of Filing of Liquidation Analysis With Respect to Disclosure Statement For First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):350 Notice, 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/05/2025)
10/06/2025	453 (479 pgs; 10 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):122 Emergency Motion (with hearing date), 430 Witness List, Exhibit List, 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	454 (5 pgs)	Agenda for Hearing on 10/6/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	455 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Hearing held on October 6, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/7/25. Estimated completion date: 10/8/2025. Modified on 10/7/2025 (anc4). (Entered: 10/06/2025)
10/06/2025	456 (26 pgs; 2 docs)	Transcript RE: Continued Hearing held on October 3, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/5/2026. (mhen) (Entered: 10/06/2025)
10/06/2025	457 (245 pgs)	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 Forms 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, Signed on 10/6/2025 (Related document(s):122 Emergency Motion (with hearing date)) **Confirmation hearing to be held on 11/18/2025 at 08:00 AM at telephone and video conference.** (abh4) (Entered: 10/06/2025)
10/06/2025	458 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 am to 10:12 am. Appearances: see log. Additional appearances: Andrew Behlmann and Lindsay Sklar. Motion hearing held. Oral argument heard on the record. The Court approves the disclosure statement for reasons stated on the record. Regarding motion 409, parties are encouraged to draft an agreed conditional order otherwise the Court will set a hearing for next week. ERO: yes. (Related document(s):122 Emergency Motion (with hearing date), 409 Generic Motion) (abh4) (Entered: 10/06/2025)
10/06/2025	459 (1 pg)	PDF with attached Audio File. Court Date & Time [10/6/2025 9:00:25 AM]. File Size [34057 KB]. Run Time [01:10:57]. (admin). (Entered: 10/06/2025)
10/06/2025	460 (1 pg)	MOTION to Appear Pro Hac Vice for David K May (Fee Paid: $100, receipt number A26538990) Filed by Interested Party Debra Jones (May, David) (Entered: 10/06/2025)
10/06/2025	461 (1 pg)	Order Granting Motion for David K. May To Appear pro hac vice (Related Doc # 460) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/6/2025. (abh4) (Entered: 10/06/2025)
10/06/2025	462 (160 pgs; 3 docs)	Notice *of Filing of Revised Proposed Final DIP Order*. (Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order, 385 Proposed Order) Filed by ModivCare Inc. (Attachments: # 1 Proposed Order # 2 Exhibit A (Redline)) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	463 (76 pgs)	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) Granting Related Relief, Signed on 10/6/2025 (Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order) (abh4) (Entered: 10/06/2025)
10/06/2025	464 (4 pgs)	Notice of Appearance and Request for Notice Filed by Sean Thomas Wilson Filed by on behalf of Coliseum Capital Partners, L.P. (Wilson, Sean) (Entered: 10/06/2025)
10/06/2025	465 (66 pgs)	First Amended Chapter 11 Plan Filed by ModivCare Inc.. (Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	466 (233 pgs)	Amended Disclosure Statement Filed by ModivCare Inc.. (Related document(s):120 Disclosure Statement) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	467 (257 pgs)	Notice *of Filing of Solicitation Versions of Plan and Disclosure Statement*. (Related document(s):465 Amended Chapter 11 Plan, 466 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/06/2025)

10/07/2025	468 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the October 6, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/08/2025. Estimated completion date: 10/09/2025. Modified on 10/8/2025 (bow4). (Entered: 10/07/2025)
10/08/2025	469 (2 pgs)	Ex Parte MOTION to Appear Pro Hac Vice for Frederick L. Bunol (Fee Paid: $100, receipt number A26546826) Filed by Creditor Mae Ella Robertson (Bunol, Frederick) (Entered: 10/08/2025)
10/08/2025	470 (2 pgs)	Ex Parte MOTION to Appear Pro Hac Vice for McKenna D Dorais (Fee Paid: $100, receipt number A26546965) Filed by Creditor Mae Ella Robertson (Dorais, McKenna) (Entered: 10/08/2025)
10/08/2025	471 (31 pgs; 5 docs)	Motion for Relief from Stay *to Determine Inapplicability of Stay to Non-Debtors and Continue Litigation with Recovery Limited to Debtor Insurance*. Fee Amount $199. Filed by Creditor Thresa Lyons Hearing scheduled for 10/30/2025 at 11:00 AM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Proposed Order # 2 Exhibit A # 3 Exhibit B # 4 Exhibit C) (Norwood, Bach) (Entered: 10/08/2025)
10/08/2025	472 (47 pgs)	Application to Employ. Objections/Request for Hearing Due in 21 days. Filed by Creditor Committee Official Committee Of Unsecured Creditors (Pesce, Gregory) (Entered: 10/08/2025)
10/08/2025	473 (80 pgs)	Application to Employ. Objections/Request for Hearing Due in 21 days. Filed by Creditor Committee Official Committee Of Unsecured Creditors (Pesce, Gregory) (Entered: 10/08/2025)
10/08/2025	474 (56 pgs; 2 docs)	Transcript RE: Disclosure Statement Hearing held on October 6, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/6/2026. (mhen) (Entered: 10/08/2025)
10/08/2025	475 (11 pgs)	Certificate *of Service re: Motion of Debtors for Entry of an Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):412 Motion to Extend Time) (Gershbein, Evan) (Entered: 10/08/2025)
10/08/2025	476 (16 pgs)	Certificate *of Service re: Notice of Unresolved Issues Regarding Entry of Final DIP Order in Advance of Continued Final DIP Hearing* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):429 Notice) (Gershbein, Evan) (Entered: 10/08/2025)
10/08/2025	477 (9 pgs)	Certificate *of Service re: 1) Notice of Filing of Revised Proposed 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 Forms 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; 2) Notice of Filing of (I) First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and (II) Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 3) Agenda of Debtors for Matters Set for Hearing on October 6, 2025 (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):447 Notice, 450 Notice, 454 Agenda) (Gershbein, Evan) (Entered: 10/08/2025)
10/08/2025	478 (16 pgs)	Certificate *of Service re: 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, and (E) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):463 Generic Order) (Gershbein, Evan) (Entered: 10/08/2025)
10/09/2025	479 (2 pgs)	Order Granting Motion for Frederick L. Bunol To Appear pro hac vice (Related Doc # 469) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/9/2025. (abh4) (Entered: 10/09/2025)
10/09/2025	480 (2 pgs)	Order Granting Motion for McKenna D. Dorais To Appear pro hac vice (Related Doc # 470) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/9/2025. (abh4) (Entered: 10/09/2025)
10/09/2025	481 (4 pgs)	Notice of Appearance and Request for Notice Filed by Courtney Hull Filed by on behalf of Texas Comptroller of Public Accounts, Revenue Accounting Division (Hull, Courtney) (Entered: 10/09/2025)
10/09/2025	482 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of October 3, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/09/2025. Estimated completion date: 10/10/2025. Modified on 10/9/2025 (amp4). (Entered: 10/09/2025)
10/09/2025	483 (6 pgs)	Notice *of Filing of Debtors' and Committee's Proposed Confirmation Schedules*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/09/2025)
10/09/2025	484 (19 pgs)	Emergency Motion */ The Official Committee of Unsecured Creditors' Emergency Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in connection with Confirmation of the Debtors' Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/09/2025)
10/09/2025	485 (13 pgs)	BNC Certificate of Mailing. (Related document(s):456 Transcript) No. of Notices: 81. Notice Date 10/09/2025. (Admin.) (Entered: 10/09/2025)
10/10/2025	486 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Status Conference held on October 10, 2025 before Judge Alfredo R. Perez. Court

		Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/10/2025. Estimated completion date: 10/11/2025. Modified on 10/10/2025 (bow4). (Entered: 10/10/2025)
10/10/2025	487 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 am to 9:00 am. Appearances: see log. Status conference held. Oral argument heard. The confirmation hearing is continued to 12/8/2025 at 9:00 am. ERO: yes. (Related document(s):1 Voluntary Petition (Chapter 11), 445 Amended Chapter 11 Plan) **Confirmation hearing to be held on 12/8/2025 at 09:00 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 10/10/2025)
10/10/2025	488 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by DIP Parties. This is to order a transcript of October 10, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Copy Electronically forwarded to Judicial Transcribers of Texas on 10/10/2025. Estimated completion date: 10/11/2025. Modified on 10/10/2025 (bow4). (Entered: 10/10/2025)
10/10/2025	489 (1 pg)	PDF with attached Audio File. Court Date & Time [10/10/2025 8:30:01 AM]. File Size [14233 KB]. Run Time [00:29:39]. (admin). (Entered: 10/10/2025)
10/10/2025	490 (15 pgs; 3 docs)	Certificate of No Objection *Regarding Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (Filed By ModivCare Inc.).(Related document(s):335 Generic Motion) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 10/10/2025)
10/10/2025	491 (33 pgs; 3 docs)	Certificate of No Objection *Regarding Motion of Debtors for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):336 Generic Motion) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 10/10/2025)
10/10/2025	492 (15 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 6, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 28 Initial Order Complex Chapter 11, 53 Order on Emergency Motion, 57 Order on Emergency Motion, 58 Order on Emergency Motion, 66 Order on Emergency Motion, 113 Certificate, 128 Certificate, 353 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 10/10/2025)
10/11/2025	493 (11 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Application For Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):338 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	494 (11 pgs; 3 docs)	Certificate of No Objection *Regarding Application of Debtors to Employ and Retain Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel For the Debtors and Debtors-In-Possession* (Filed By

		ModivCare Inc.).(Related document(s):339 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	495 (49 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Application For Entry of an Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):340 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	496 (20 pgs; 3 docs)	Certificate of No Objection *Regarding Application of Debtors For Entry of an Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for the Debtors Effective as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):341 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	497 (10 pgs; 2 docs)	Certificate of No Objection *Regarding Debtors' Application For Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors In Possession as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Related document(s):342 Application to Employ) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	498 (13 pgs)	BNC Certificate of Mailing. (Related document(s):474 Transcript) No. of Notices: 82. Notice Date 10/11/2025. (Admin.) (Entered: 10/11/2025)
10/13/2025	499 (1 pg)	MOTION to Appear Pro Hac Vice for Shawn M. Krogh (Fee Paid: $100, receipt number A26559905) Filed by Creditor AlphaOne Ambulance Medical Services, Inc. (Krogh, Shawn) (Entered: 10/13/2025)
10/12/2025	500 (6 pgs)	Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (Related Doc # 335), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	501 (15 pgs)	Order Authorizing Debtors to Retain and Compensate Professionals Used in the Ordinary Course of Business (Related Doc # 336), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	502 (4 pgs)	Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date (Related Doc # 338), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	503 (4 pgs)	Order Authorizing the Employment and Retention of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors and Debtors-in-Possession (Related Doc # 339), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)

10/12/2025	504 (23 pgs)	Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date (Related Doc # 340), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	505 (8 pgs)	Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for Debtors, Effective as of the Petition Date; and (B) Granting Related Relief (Related Doc # 341), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	506 (7 pgs)	Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief (Related Doc 342), Signed on 10/12/2025. (abh4)Modified on 10/14/2025 (abh4). (Entered: 10/14/2025)
10/13/2025	507 (7 pgs)	Order Authorizing the Debtors to (A) Reject Certain Unexpired Leases and (B) Abandon Certain Remaining Personal Property in Connection Therewith (Related Doc # 337), Signed on 10/13/2025. (abh4) (Entered: 10/14/2025)
10/14/2025	508 (1 pg)	Order Granting Motion for Shawn M. Krogh To Appear pro hac vice (Related Doc # 499) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/14/2025. (abh4) (Entered: 10/14/2025)
10/14/2025	509 (11 pgs; 3 docs)	Notice *of First Modified Ordinary Course Professional Schedule*. (Related document(s):501 Generic Order) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - First Modified Schedule of Debtors' Ordinary Course Professionals # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	510 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Bondurant, Mixson & Elmore, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	511 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Bowles Rice LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	512 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Bradley Arant Boult Cummings LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)

10/14/2025	513 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of ByrdGomes LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	514 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Capital City Consulting, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	515 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Capital Impact Group, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	516 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Centerpoint360, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	517 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Faegre Drinker Biddle & Reath LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	518 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of FTI Consulting, Inc. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	519 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Gaffney, Bennett & Associates Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	520 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Honigman LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	521 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of James Miller & Associates, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	522 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of J.L. Morgan Company, Inc. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of*

		Business (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	523 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Kelley Consulting LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	524 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of KPMG LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	525 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Kramon & Graham, P.A. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	526 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Littler Mendelson P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	527 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Maine Street Solutions Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	528 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of McCall Hamilton Advocacy, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	529 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Mercury Public Affairs LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	530 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of MJ Simon and Company Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Solutions, LLC).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	531 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Nielsen Merksamer, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)

10/14/2025	532 (6 pgs)	Declaration re: */ Declaration of Disinterestedness of Nixon Peabody LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	533 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Polsinelli PC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	534 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of PwC US Business Advisory LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Solutions, LLC).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	535 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Ridge Policy Group LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	536 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Saul Ewing LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	537 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of The Southern Group of South Carolina 2005, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	538 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Verrill Dana LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	539 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Wilcox Savage Consulting, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	540 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Willcox & Savage, P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)

10/14/2025	541 (4 pgs)	Declaration re: *Declaration of Disinterestedness of Willoughby Humphrey & D'Antoni, P.A. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	542 (4 pgs)	Declaration re: *Declaration of Disinterestedness of West Virginia Lobbyist Group, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	543 (9 pgs)	Declaration re: | *Declaration of Chad J. Shandler in Support of the Motion of Debtors For Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):439 Sealed Document, 440 Redacted Document In Advance of Sealed Paper) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	544 (11 pgs; 2 docs)	Motion to Extend Time */ Motion of Debtors for Entry of an Order Extending the Time for Debtors to Update Business Forms* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/15/2025	545 (26 pgs; 2 docs)	Transcript RE: Status Conference held on October 10, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/13/2026. (mhen) (Entered: 10/15/2025)
10/15/2025	546 (7 pgs)	Stipulation By ModivCare Inc. and The Official Committee of Unsecured Creditors, the Prepetition First Lien Agent, Consenting Creditors, and DIP Lenders. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Related document(s):457 Order Setting Hearing) (Davidson, Timothy) (Entered: 10/15/2025)
10/15/2025	547 (26 pgs; 2 docs)	Transcript RE: Status Conference Hearing (Via Zoom) AMENDED TRANSCRIPT held on October 10, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/13/2026. (mhen) (Entered: 10/15/2025)
10/16/2025	548 (7 pgs)	Stipulation and Agreed Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief, Signed on 10/16/2025 (Related document(s):457 Order Setting Hearing, 546 Stipulation) (abh4) (Entered: 10/16/2025)

10/16/2025	549 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 10/16/2025)
10/16/2025	550 (286 pgs; 2 docs)	Amended Disclosure Statement Filed by ModivCare Inc.. (Related document(s):120 Disclosure Statement) (Attachments: # 1 Redline) (Davidson, Timothy) (Entered: 10/16/2025)
10/16/2025	551 (29 pgs; 3 docs)	Notice *of Filing of Updated Disclosure Statement and Solicitation Procedures Order*. (Related document(s):457 Order Setting Hearing, 550 Amended Disclosure Statement) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Updated Solicitation Procedures Order # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 10/16/2025)
10/17/2025	552 (12 pgs)	Amended Order (A) Approving Disclosure Statement; (B) Scheduling Confirmation Hearing; (C) Establishing Related Objection and Voting Deadlines; (D) Approving Related Solicition Procedures, Ballots, and Release Opt-Out Forms 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, Signed on 10/17/2025 (Related document(s):122 Emergency Motion (with hearing date)) (abh4) (Entered: 10/17/2025)
10/17/2025	553 (10 pgs)	Stipulation By ModivCare Inc. and Proposed Lead Plaintiff. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):382 Objection, 409 Generic Motion) (Davidson, Timothy) (Entered: 10/17/2025)
10/18/2025	554 (12 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee of the Debtors Effective as of September 15, 2025* (Filed By ModivCare Inc.). (Related document(s):362 Application to Employ) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 10/18/2025)
10/18/2025	555 (13 pgs)	BNC Certificate of Mailing. (Related document(s):545 Transcript) No. of Notices: 83. Notice Date 10/18/2025. (Admin.) (Entered: 10/18/2025)
10/18/2025	556 (13 pgs)	BNC Certificate of Mailing. (Related document(s):547 Transcript) No. of Notices: 83. Notice Date 10/18/2025. (Admin.) (Entered: 10/18/2025)
10/20/2025	557 (10 pgs)	Stipulation and Agreed Order Regarding Proposed Lead Plaintiff Opt-Out of Third Party Release on Behalf of Proposed Class in Securities Litigation, Signed on 10/20/2025 (Related document(s):382 Objection, 409 Generic Motion, 553 Stipulation) (abh4) (Entered: 10/20/2025)
10/20/2025	558 (4 pgs)	Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee as of September 15, 2025 (Related Doc # 362), Signed on 10/20/2025. (abh4) (Entered: 10/20/2025)
10/17/2025	559 (4 pgs)	Notice *of Lien*. (Related document(s):1 Voluntary Petition (Chapter 11)) Filed by Tammy Jones (cak4) (Entered: 10/20/2025)

10/20/2025	560 (9 pgs)	Certificate *of Service re: 1) Declaration of Chad J. Shandler in Support of the Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; 2) Motion of Debtors for Entry of an Order Extending the Time for Debtors to Update Business Forms; 3) Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; and 4) Debtors Motion to Seal Exhibit to Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):440 Redacted Document In Advance of Sealed Paper, 441 Motion to Seal, 543 Declaration, 544 Motion to Extend Time) (Gershbein, Evan) (Entered: 10/20/2025)
10/21/2025	561 (2 pgs)	Notice of Appearance and Request for Notice Filed by Tammy Jones (amp4) (Entered: 10/21/2025)
10/21/2025	562 (10 pgs)	Proposed Order RE: *[Revised] Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):472 Application to Employ) (Pesce, Gregory) (Entered: 10/21/2025)
10/21/2025	563 (5 pgs; 2 docs)	Motion to Extend Time *to File Proof of Claims* Filed by Interested Party Peggy Aaron (Attachments: # 1 Proof of Claims) (bow4) (Entered: 10/21/2025)
10/21/2025	564 (13 pgs)	Certificate *of Service re: Documents Served on October 14, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):500 Generic Order, 501 Generic Order, 502 Order on Application to Employ, 503 Order on Application to Employ, 504 Order on Application to Employ, 505 Order on Application to Employ, 506 Order on Application to Employ, 507 Order on Motion to Reject Lease or Executory Contract, 509 Notice) (Gershbein, Evan) (Entered: 10/21/2025)
10/21/2025	565 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):548 Generic Order) (Gershbein, Evan) (Entered: 10/21/2025)
10/21/2025	566 (8 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Regarding Proposed Lead Plaintiff Opt-Out of Third-Party Release on Behalf of Proposed Class in Securities Litigation; and 2) Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee as of September 15, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):557 Generic Order, 558 Order on Application to Employ) (Gershbein, Evan) (Entered: 10/21/2025)
10/21/2025	567 (64 pgs; 4 docs)	Application to Employ Cresa, LLC as Real Estate Consultant and Advisor. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A - Services Agreement # 2

		Exhibit B - Gregg Declaration # 3 Proposed Order) (Davidson, Timothy) (Entered: 10/21/2025)
10/22/2025	568 (3 pgs)	US Trustee's Notice *of Reconstitution of the Official Committee of Unsecured Creditors (to reflect resignation of Member Randstad North America from Committee)*. (Whitworth, Jana) (Entered: 10/22/2025)
10/22/2025	569 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Hinman Straub Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/22/2025)
10/23/2025	570 (9 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):471 Motion for Relief From Stay) (Davidson, Timothy) (Entered: 10/23/2025)
10/24/2025	571 (1 pg)	MOTION to Appear Pro Hac Vice for Donovan Jones (Fee Paid: $100, receipt number A26599718) Filed by Creditor Seini Ika (Jones, Donovan) (Entered: 10/24/2025)
10/24/2025	572 (3 pgs)	Notice of Appearance and Request for Notice Filed by Craig Andrew Stanfield Filed by on behalf of First Lien Agent, Consenting Creditors, and DIP Lenders (Stanfield, Craig) (Entered: 10/24/2025)
10/24/2025	573 (8 pgs)	Certificate *of Service re: Application of Debtors for Entry of an Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors-in-Possession as of the Petition Date* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):567 Application to Employ) (Gershbein, Evan) (Entered: 10/24/2025)
10/24/2025	574 (51 pgs; 4 docs)	Application to Employ Mills Halstead Zaloudek, LLC as Real Estate Counsel. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A - Halstead Declaration # 2 Exhibit B - Retention Declaration # 3 Proposed Order) (Davidson, Timothy) (Entered: 10/24/2025)
10/25/2025	575 (16 pgs)	BNC Certificate of Mailing. (Related document(s):568 US Trustee's Notice) No. of Notices: 102. Notice Date 10/25/2025. (Admin.) (Entered: 10/25/2025)
10/27/2025	576 (9 pgs)	Objection */ The Official Committee of Unsecured Creditors' Preliminary Objection to the Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and among the Debtors and UHC and (B) Granting Related Relief [Related Docket No. 439]*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/27/2025)
10/27/2025	577 (1 pg)	Order Granting Motion for Donovan C. Jones To Appear pro hac vice (Related Doc # 571) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/27/2025. (abh4) (Entered: 10/27/2025)
10/27/2025	578 (1 pg)	Order Granting Motion to Withdraw Appearance (Related Doc # 425), Signed on 10/27/2025. (abh4) (Entered: 10/27/2025)

10/27/2025	579 (2 pgs)	Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code (Related Doc # 412), Signed on 10/27/2025. (abh4) (Entered: 10/27/2025)
10/27/2025	580 (3 pgs)	Notice *of Hearing to Be Held on October 30, 2025, at 1:00 p.m. (prevailing Central Time)*. (Related document(s):439 Sealed Document, 440 Redacted Document In Advance of Sealed Paper, 576 Objection) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/27/2025)
10/27/2025	581 (5 pgs; 2 docs)	Motion to Continue Hearing On (related document(s):471 Motion for Relief From Stay, 570 Response). Filed by Creditor Thresa Lyons Hearing scheduled for 10/30/2025 at 11:00 AM. (Attachments: # 1 Proposed Order) (Norwood, Bach) (Entered: 10/27/2025)
10/28/2025	582 (1 pg)	Order Granting Agreed Motion to Continue Hearing on Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors (Related Doc # 581), Signed on 10/28/2025. **Hearing scheduled for 11/18/2025 at 11:00 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 10/28/2025)
10/28/2025	583 (2 pgs)	Order Granting Debtors' Motion to Seal Exhibit to Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief (Related Doc # 441), Signed on 10/28/2025. (abh4) (Entered: 10/28/2025)
10/28/2025	584 (244 pgs; 4 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 [Filed Under Seal] # 2 Exhibit 2 # 3 Exhibit 3) (Koster, Charles) (Entered: 10/28/2025)
10/28/2025	585 (1 pg)	Sealed Document */ Exhibit 1 to the Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled for October 30, 2025, at 11:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 10/28/2025)
10/28/2025	586 (8 pgs; 8 docs)	Sealed Document , Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7) (Davidson, Timothy) (Entered: 10/28/2025)
10/28/2025	587 (23 pgs; 8 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):586 Sealed Document, Witness List, Exhibit List) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 (Filed Under Seal) # 4 Exhibit 4 (Filed Under Seal) # 5 Exhibit 5 (Filed Under Seal) # 6 Exhibit 6 (Filed Under Seal) # 7 Exhibit 7 (Filed Under Seal)) (Davidson, Timothy) (Entered: 10/28/2025)
10/28/2025	588 (25 pgs)	Declaration re: */ Declaration of Disinterestedness of Baker & Hostetler LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/28/2025)
10/28/2025	589 (7 pgs)	Statement *of Consenting Creditors with Respect to the Application of the Official Committee of Unsecured Creditors for Entry of an Order*

		Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025 (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders).(Related document(s):472 Application to Employ) (Warren, Matthew) (Entered: 10/28/2025)
10/29/2025	590 (3 pgs)	Notice *of Class Opt-Out*. (Related document(s):557 Generic Order) Filed by Lead Plaintiff Christopher Skrypski (Behlmann, Andrew) (Entered: 10/29/2025)
10/29/2025	591 (3 pgs)	Notice *of Intent to Adduce Testimony From a Remote Location By Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/29/2025)
10/29/2025	592 (2 pgs)	Certificate *of Service* (Filed By Lead Plaintiff Christopher Skrypski). (Related document(s):590 Notice) (Behlmann, Andrew) (Entered: 10/29/2025)
10/29/2025	593 (4 pgs)	Declaration re: */ Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):472 Application to Employ, 562 Proposed Order) (Pesce, Gregory) (Entered: 10/29/2025)
10/29/2025	594 (7 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):439 Sealed Document, 576 Objection) (Davidson, Timothy) (Entered: 10/29/2025)
10/29/2025	595 (4 pgs)	Agenda for Hearing on 10/30/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 10/29/2025)
10/29/2025	596 (9 pgs; 5 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors).(Related document(s):584 Witness List, Exhibit List, 585 Sealed Document) (Attachments: # 1 Exhibit 4 [Filed Under Seal] # 2 Exhibit 5 [Filed Under Seal] # 3 Exhibit 6 [Filed Under Seal] # 4 Exhibit 7 [Filed Under Seal]) (Koster, Charles) (Entered: 10/29/2025)
10/29/2025	597 (5 pgs; 5 docs)	Sealed Document */ The Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for the Hearing Scheduled for October 30, 2025, at 1:00 P.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 4 # 2 Exhibit 5 # 3 Exhibit 6 # 4 Exhibit 7) (Koster, Charles) (Entered: 10/29/2025)
10/29/2025	598 (12 pgs)	Certificate *of Service re: Debtors' Objection to Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):570 Response) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	599 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Stevens & Lee, P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/29/2025)

10/29/2025	600 (11 pgs)	Certificate *of Service re: 1) Order Granting Debtors' Motion to Seal Exhibit to Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; and 2) Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):583 Order on Motion to Seal, 587 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	601 (9 pgs)	Certificate *of Service re: 1) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology; 2) Debtors Reply in Support of Their Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; and 3) Agenda of Debtors for Matters Set for Hearing on October 30, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):591 Notice, 594 Response, 595 Agenda) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	602 (20 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 15, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 128 Certificate, 353 Certificate, 354 Certificate) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	603 (9 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 21, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 10/29/2025)
10/30/2025	604 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 10/30/2025)
10/30/2025	605 (334 pgs)	Notice *of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/30/2025)
10/30/2025	606 (1 pg)	Courtroom Minutes. Time Hearing Held: 1:00 pm to 2:28 pm; 2:50 pm to 3:51 pm. Appearances: see log. Sworn and testified witness: Chad Shandler. Admitted exhibits: ECF Nos. 587-1 through 587-7/586-1 through 586-7 (sealed) ; 587-2/586-2 (sealed) is admitted as direct testimony subject to cross examination; 596-1 through 596-7. Judicial notice taken of binder exhibit 7-11 presented by Christopher Shore for the Official Committee of Unsecured Creditors. Motion hearing held. Oral argument heard. Motion 440 is granted for reasons stated on the record. Mr. Shore is to e-mail the exhibits as stated on the record. Debtor is to submit a proposed order ERO: yes. (Related document(s):440 Redacted Document In Advance of Sealed Paper) (abh4)Modified on 10/30/2025 (abh4).Modified on 10/31/2025 (abh4). (Entered: 10/30/2025)
10/30/2025	607 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by DIP Lenders. This is to order a transcript of October 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Electronically forwarded to Judicial Transcribers of

		Texas on 10/31/2025. Estimated completion date: 11/1/2025. Modified on 10/31/2025 (smg4). (Entered: 10/30/2025)
10/30/2025	608 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of Hearing held on October 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Davidson, Timothy) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/31/2025. Estimated completion date: 11/01/2025. Modified on 10/31/2025 (smg4). (Entered: 10/30/2025)
10/30/2025	609 (8 pgs; 2 docs)	Certificate of No Objection *to the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):472 Application to Employ) (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 10/30/2025)
10/30/2025	610 (1 pg)	PDF with attached Audio File. Court Date & Time [10/30/2025 1:00:08 PM]. File Size [41577 KB]. Run Time [01:26:37]. (admin). (Entered: 10/30/2025)
10/30/2025	611 (1 pg)	PDF with attached Audio File. Court Date & Time [10/30/2025 2:50:26 PM]. File Size [28640 KB]. Run Time [00:59:40]. (admin). (Entered: 10/30/2025)
10/30/2025	612 (9 pgs)	Certificate *of Service re: 1) Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025; 2) Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code; and 3) Notice of Hearing to be Held on October 30, 2025, at 1:00 pm (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):574 Application to Employ, 579 Order on Motion to Extend Time, 580 Notice) (Gershbein, Evan) (Entered: 10/30/2025)
10/31/2025	613 (2 pgs)	Notice *of Continued Hearing to Be Held on November 18, 2025 at 11:00 a.m. CST*. (Related document(s):471 Motion for Relief From Stay) Filed by Thresa Lyons (Norwood, Bach) (Entered: 10/31/2025)
10/31/2025	614 (1 pg)	MOTION to Appear Pro Hac Vice for Ashley Chase (Fee Paid: $100, receipt number A26618054) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Chase, Ashley) (Entered: 10/31/2025)
10/30/2025	615 (9 pgs)	Order Granting Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief, Signed on 10/30/2025 (Related document(s):439 Sealed Document, 440 Redacted Document In Advance of Sealed Paper) (abh4) (Entered: 10/31/2025)
10/31/2025	616 (4 pgs)	Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025 (Related Doc # 472), Signed on 10/31/2025. (abh4) (Entered: 10/31/2025)

10/31/2025	617 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the October 30, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/31/2025. Estimated completion date: 11/01/2025. Modified on 10/31/2025 (smg4). (Entered: 10/31/2025)
10/31/2025	618 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $12023105 disbursed (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	619 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $1267171 disbursed (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	620 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $4564984 disbursed (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	621 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $232052384 disbursed (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	622 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $68848132 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	623 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	624 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	625 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	626 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	627 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	628 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	629 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 10/31/2025)

10/31/2025	630 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	631 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	632 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	633 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	634 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	635 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	636 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	637 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	638 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	639 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	640 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	641 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
11/03/2025	642 (1 pg)	Order Granting Motion for Ashley Chase To Appear pro hac vice (Related Doc # 614) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/3/2025. (abh4) (Entered: 11/03/2025)
11/03/2025	643 (3 pgs)	Declaration re: */ Supplemental Declaration of David MacGreevey of AlixPartners, LLP* (Filed By Official Committee Of Unsecured Creditors

		).(Related document(s):473 Application to Employ) (Koster, Charles) (Entered: 11/03/2025)
11/03/2025	644 (5 pgs)	Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025 (Related Doc # 473) Signed on 11/3/2025. (abh4) (Entered: 11/03/2025)
11/03/2025	645 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Anderson Richard Consulting, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/03/2025)
11/03/2025	646 (2 pgs)	Notice of Appearance and Request for Notice Filed by Phillip John Conley Filed by on behalf of Lifestar Response of Maryland, Inc., Keystone Quality Transport (Conley, Phillip) (Entered: 11/03/2025)
11/03/2025	647 (108 pgs; 2 docs)	Transcript RE: Motion to Extend Exclusivity held on October 30, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 02/2/2026. (mhen) (Entered: 11/03/2025)
11/03/2025	648 (32 pgs; 3 docs)	Objection *(Limited) to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases*. Filed by Keystone Quality Transport, Lifestar Response of Maryland, Inc. (Attachments: # 1 Exhibit A # 2 Exhibit B) (Conley, Phillip) (Entered: 11/03/2025)
11/03/2025	649 (2 pgs)	Certificate *of Service to Limited Objection to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases* (Filed By Keystone Quality Transport, Lifestar Response of Maryland, Inc.). (Conley, Phillip) (Entered: 11/03/2025)
11/03/2025	650 (17 pgs; 3 docs)	Agreed Order and Certificate of Counsel (Filed By Official Committee Of Unsecured Creditors).(Related document(s):473 Application to Employ) (Attachments: # 1 Proposed Order # 2 Redline) (Koster, Charles) (Entered: 11/03/2025)
11/03/2025	651 (3 pgs)	Affidavit Re: *Publication of the Notice of (I) Confirmation Hearing on Joint Chpater 11 Plan and Related Matters and (II) Objection Deadline in The New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):552 Generic Order) (Gershbein, Evan) (Entered: 11/03/2025)
11/03/2025	652 (108 pgs; 2 docs)	Transcript RE: 9019 Motion Hearing (AMENDED TRANSCRIPT) held on October 30, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 02/2/2026. (mhen) (Entered: 11/03/2025)

11/03/2025	653 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Castleberry Law Firm, PLLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/03/2025)
11/04/2025	654 (6 pgs)	Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025, Signed on 11/4/2025 (Related document(s):473 Application to Employ, 650 Agreed Order and Certificate of Counsel) (abh4) (Entered: 11/04/2025)
11/04/2025	655 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Amber Integrated, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/04/2025	656 (4 pgs)	Letter from Amy Sandoval (dmm4) (Entered: 11/04/2025)
10/30/2025	657 (6 pgs; 2 docs)	Motion for Relief from Stay . Receipt Number O, Fee Amount $199. Filed by Creditor Lisa Sallaj (amp4) (Entered: 11/04/2025)
10/30/2025	658 (20 pgs)	Exhibits by Lisa Sallaj (amp4) (Entered: 11/04/2025)
10/30/2025	659 (3 pgs)	Notice of Appearance and Request for Notice Filed by Lisa Sallaj (amp4) (Entered: 11/04/2025)
11/04/2025	660 (2 pgs; 2 docs)	Sealed Motion */ Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/04/2025	661 (13 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/04/2025	662 (8 pgs; 2 docs)	Motion to Seal */ Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/04/2025)
10/30/2025	663 (5 pgs)	Application *to Proceed without Payment* Filed by Creditor Lisa Sallaj (dah4) (Entered: 11/05/2025)

11/05/2025	664 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Derrryberry & Niafeh, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/05/2025)
11/05/2025	665 (1 pg)	MOTION to Appear Pro Hac Vice for Donna M. Brewer (Fee Paid: $100, receipt number A26634521) Filed by Creditor City of Boston (Brewer, Donna) (Entered: 11/05/2025)
11/05/2025	666 (70 pgs)	Statement */ First Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through September 30, 2025* (Filed By AlixPartners, LLP). (Koster, Charles) (Entered: 11/05/2025)
11/05/2025	667 (8 pgs)	Certificate *of Service re: Order Granting Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):615 Generic Order) (Gershbein, Evan) (Entered: 11/05/2025)
11/05/2025	668 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 28, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 11/05/2025)
11/06/2025	669 (1 pg)	Order Granting Motion for Donna M. Brewer To Appear pro hac vice (Related Doc # 665) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/6/2025. (abh4) (Entered: 11/06/2025)
11/06/2025	670 (11 pgs; 2 docs)	Objection to Claim Number by Claimant */ Debtors' Omnibus Objection to Certain Proofs of Claim* (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/06/2025)
11/06/2025	671 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Manatt, Phelps & Phillips, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/06/2025)
11/06/2025	672 (2 pgs)	Notice of Appearance and Request for Notice Filed by Phillip John Conley Filed by on behalf of Northeast Treatment Centers (Conley, Phillip) (Entered: 11/06/2025)
11/06/2025	673 (12 pgs; 3 docs)	Objection *(Limited) to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases*. Filed by Northeast Treatment Centers (Attachments: # 1 Exhibit A # 2 Exhibit B) (Conley, Phillip) (Entered: 11/06/2025)
11/06/2025	674 (2 pgs)	Certificate *of Service to Limited Objection to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases* (Filed

		By Northeast Treatment Centers). (Conley, Phillip) (Entered: 11/06/2025)
11/06/2025	675 (14 pgs)	BNC Certificate of Mailing. (Related document(s):647 Transcript) No. of Notices: 84. Notice Date 11/06/2025. (Admin.) (Entered: 11/06/2025)
11/06/2025	676 (14 pgs)	BNC Certificate of Mailing. (Related document(s):652 Transcript) No. of Notices: 84. Notice Date 11/06/2025. (Admin.) (Entered: 11/06/2025)
11/07/2025	677 (5 pgs; 2 docs)	Certificate of No Objection *Regarding Motion of Debtors for Entry of an Order Extending the Time for Debtors to Update Business Forms* (Filed By ModivCare Inc.).(Related document(s):544 Motion to Extend Time) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	678 (4 pgs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors).(Related document(s):548 Generic Order) (Koster, Charles) (Entered: 11/07/2025)
11/07/2025	679 (4 pgs)	Witness List (Filed By ModivCare Inc.).(Related document(s):548 Generic Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	680 (4 pgs)	Witness List (Filed By Official Committee Of Unsecured Creditors). (Related document(s):548 Generic Order) (Koster, Charles) (Entered: 11/07/2025)
11/07/2025	681 (2 pgs)	Witness List (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) (Entered: 11/07/2025)
11/07/2025	682 (11 pgs)	Declaration re: */ Declaration of Disinterestedness of Gibson, Dunn & Crutcher LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	683 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Perry Jacobson Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	684 (64 pgs)	Statement */ White & Case LLP's First Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and including September 30, 2025* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 11/07/2025)
11/10/2025	685 (2 pgs)	Order Extending the Time for Debtors to Update Business Forms (Related Doc # 544), Signed on 11/10/2025. (abh4) (Entered: 11/10/2025)
11/10/2025	686 (2 pgs)	Witness List (Filed By Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties). (Bressler, Gary) (Entered: 11/10/2025)

11/10/2025	687 (18 pgs)	Declaration re: *of Daniel B. Silvers, Investigating Director of Modivcare Inc., in Support of Joint Chapter 11 Plan of Reorganization of Modivcare Inc. and its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):483 Notice) (Kelly, Cameron) (Entered: 11/10/2025)
11/10/2025	688 (8 pgs)	Certificate *of Service re: 1) Debtors Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief; and 2) Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):661 Generic Motion, 662 Motion to Seal) (Gershbein, Evan) (Entered: 11/10/2025)
11/11/2025	689 (12 pgs)	Certificate *of Service re: Debtors' Omnibus Objection to Certain Proofs of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):670 Objection to Claim) (Gershbein, Evan) (Entered: 11/11/2025)
11/12/2025	690 (39 pgs; 3 docs)	Objection *to Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases (Doc. 605)*. Filed by Automotive Rentals, Inc. and ARI Fleet LT (Attachments: # 1 Exhibit 1 - Master Services Agreement # 2 Exhibit 2 - Guaranty) (Chaney, Mark) (Entered: 11/12/2025)
11/12/2025	691 (1 pg)	MOTION to Appear Pro Hac Vice for Roger J. Harrington, Jr. (Fee Paid: $100, receipt number A26652866) Filed by Creditor Sarah Car Care, Inc (Harrington, Roger) (Entered: 11/12/2025)
11/12/2025	692 (1 pg)	MOTION to Appear Pro Hac Vice for Anthony J. Kudron (Fee Paid: $100, receipt number A26653769) Filed by Creditor Humana Inc., Humana Insurance Company, and their affiliates (Kudron, Anthony) (Entered: 11/12/2025)
11/12/2025	693 (11 pgs; 3 docs)	Notice *of Second Modified Ordinary Course Professional Schedule*. (Related document(s):501 Generic Order) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Second Modified Schedule of Debtors' Ordinary Course Professionals # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	694 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Balch & Bingham, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	695 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Gordon Rees Scully Mansukhani, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	696 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Underwood Law Firm, P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of*

		Business (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	697 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Hinman Straub PC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	698 (8 pgs)	Certificate *of Service re: Debtors Preliminary Witness List for the Confirmation Hearing* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):679 Witness List) (Gershbein, Evan) (Entered: 11/12/2025)
11/12/2025	699 (8 pgs)	Certificate *of Service re: Order Extending the Time for Debtors to Update Business Forms* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):685 Order on Motion to Extend Time) (Gershbein, Evan) (Entered: 11/12/2025)
11/12/2025	700 (10 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 5, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 128 Certificate, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 11/12/2025)
11/13/2025	701 (1 pg)	Order Granting Motion for Roger J. Harrington, Jr. To Appear pro hac vice (Related Doc # 691) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/13/2025. (abh4) (Entered: 11/13/2025)
11/13/2025	702 (1 pg)	Order Granting Motion for Anthony J. Kudron To Appear pro hac vice (Related Doc # 692) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/13/2025. (abh4) (Entered: 11/13/2025)
11/13/2025	703 (9 pgs; 2 docs)	Certificate of No Objection *Regarding Application of Debtors for Entry of an Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors in Possession as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):567 Application to Employ) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	704 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 11/13/2025)
11/13/2025	705 (4 pgs)	Notice of Appearance and Request for Notice Filed by Worthy W. Walker Filed by on behalf of Endurance American Specialty Insurance Company (Walker, Worthy) (Entered: 11/13/2025)
11/13/2025	706 (4 pgs)	Notice of Appearance and Request for Notice Filed by Worthy W. Walker Filed by on behalf of CNC-Access, Inc. a/k/a Community Alternatives Virginia, Inc. (Walker, Worthy) (Entered: 11/13/2025)

11/13/2025	707 (6 pgs)	Objection *to Notice of Potential Assumption*. Filed by Endurance American Specialty Insurance Company (Walker, Worthy) (Entered: 11/13/2025)
11/13/2025	708 (11 pgs)	Objection *to Notice of Potential Assumption*. Filed by CNC-Access, Inc. a/k/a Community Alternatives Virginia, Inc. (Walker, Worthy) (Entered: 11/13/2025)
11/13/2025	709 (1 pg)	MOTION to Appear Pro Hac Vice for Gary F. Torrell (Fee Paid: $100, receipt number 26657195) Filed by Creditors Covalent Health, PRN Ambulance, LLC, Protransport-1, LLC (Torrell, Gary) (Entered: 11/13/2025)
11/13/2025	710 (1 pg)	MOTION to Appear Pro Hac Vice for Thomas B. Helbig, Jr. (Fee Paid: $100, receipt number A26658657) Filed by Creditor Sarah Car Care, Inc (Helbig, Thomas) (Entered: 11/13/2025)
11/13/2025	711 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on November 10, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 28 Initial Order Complex Chapter 11, 58 Order on Emergency Motion, 113 Certificate, 128 Certificate, 352 Certificate, 394 Generic Order, 443 Certificate, 507 Order on Motion to Reject Lease or Executory Contract, 564 Certificate) (Gershbein, Evan) (Entered: 11/13/2025)
11/13/2025	712 (11 pgs; 3 docs)	Notice *of Third Modified Ordinary Course Professional Schedule*. (Related document(s):501 Generic Order) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Third Modified Schedule of Debtors' Ordinary Course Professionals # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	713 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of the Montana Group, LTD Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	714 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of ZarleyConley PLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	715 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of The Health Group, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/14/2025	716 (6 pgs)	Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors in Possession as of the Petition Date (Related Doc # 567), Signed on 11/14/2025. (abh4) (Entered: 11/14/2025)

11/14/2025	717 (1 pg)	Order Granting Motion for Gary F. Torrell To Appear pro hac vice (Related Doc # 709) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/14/2025. (abh4) (Entered: 11/14/2025)
11/14/2025	718 (1 pg)	Order Granting Motion for Thomas B. Helbig, Jr. To Appear pro hac vice (Related Doc # 710) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/14/2025. (abh4) (Entered: 11/14/2025)
11/14/2025	719 (46 pgs; 4 docs)	Objection *(Limited) To Debtors Notice Of Potential Assumption Of Certain Executory Contracts And Unexpired Leases*. Filed by Sarah Car Care, Inc (Attachments: # 1 Exhibit 1 (2016 Agreement) # 2 Exhibit 2 (MATP Agreement) # 3 Exhibit 3 (Proof of Claim)) (Harrington, Roger) (Entered: 11/14/2025)
11/14/2025	720 (2 pgs)	Certificate *of Service to (Limited) Objection to Debtors Notice Of Potential Assumption Of Certain Executory Contracts And Unexpired Leases* (Filed By Sarah Car Care, Inc).(Related document(s):719 Objection) (Harrington, Roger) (Entered: 11/14/2025)
11/14/2025	721 (10 pgs)	Limited Objection *of Counterparties to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases and Cure Amounts*. Filed by PRN Ambulance, LLC, Protransport-1, LLC (Torrell, Gary)Modified on 11/14/2025 (jm4). (Entered: 11/14/2025)
11/14/2025	722 (10 pgs; 2 docs)	Motion to Extend Time */ Debtors' Motion for Entry of an Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/14/2025)
11/14/2025	723 (69 pgs)	Notice *of Friendly Medical Transportation's Limited Objection to Debtors' Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases*. (Related document(s):605 Notice) Filed by Friendly Medical Transportation (McKay, Zachary) (Entered: 11/14/2025)
11/14/2025	724 (83 pgs)	Notice *of MedEx Medical Transport Services, Inc.'s Limited Objection to Debtors' Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases*. (Related document(s):605 Notice) Filed by MedEx Medical Transport Services, Inc. (McKay, Zachary) (Entered: 11/14/2025)
11/14/2025	725 (390 pgs)	Notice *of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):465 Amended Chapter 11 Plan, 550 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/14/2025)
11/14/2025	726 (3 pgs)	Certificate *of Service (Supplemental) re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):128 Certificate) (Gershbein, Evan) (Entered: 11/14/2025)

11/14/2025	727 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 12, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 11/14/2025)
11/14/2025	728 (3 pgs; 3 docs)	Sealed Motion / *Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Attachments: # 1 Proposed Order # 2 Exhibit B - Proposed Complaint) (Koster, Charles) (Entered: 11/14/2025)
11/14/2025	729 (3 pgs; 3 docs)	Sealed Document / *Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) For (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Proposed Order # 2 Exhibit B - Proposed Complaint) (Koster, Charles) (Entered: 11/14/2025)
11/15/2025	730 (7 pgs; 2 docs)	Certificate of No Objection *Regarding Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025* (Filed By ModivCare Inc.).(Related document(s):574 Application to Employ) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/15/2025)
11/17/2025	731 (7 pgs)	Response (Filed By The Chubb Companies). (Weideman, Corey) (Entered: 11/17/2025)
11/17/2025	732 (101 pgs)	Motion / *REDACTED Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/17/2025)
11/17/2025	733 (81 pgs)	Motion / *REDACTED Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/17/2025)
11/17/2025	734 (4 pgs)	Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025 (Related Doc # 574) Signed on 11/17/2025. (tjl4) (Entered: 11/17/2025)
11/17/2025	735 (2 pgs)	Notice of Appearance and Request for Notice Filed by Phillip John Conley Filed by on behalf of Administrative Services Cooperative, Inc. (Conley, Phillip) (Entered: 11/17/2025)

11/17/2025	736 (27 pgs; 2 docs)	Objection *to Debtors' "Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases" Doc 605*. Filed by Administrative Services Cooperative, Inc. (Attachments: # 1 Exhibit Declaration with Exhibit 1) (Conley, Phillip) (Entered: 11/17/2025)
11/17/2025	737 (2 pgs)	Certificate *of Service to Objection to Debtors' "Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases" (Doc 605)* (Filed By Administrative Services Cooperative, Inc.). (Conley, Phillip) (Entered: 11/17/2025)
11/17/2025	738 (11 pgs; 2 docs)	Response */Objection and Reservation of Rights To Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases (D.I. 605)*. Filed by CPC Management, Inc. d/b/a Germantown Cab Company (Attachments: # 1 Exhibit 1) (Monsour, Trey) (Entered: 11/17/2025)
11/17/2025	739 (1 pg)	MOTION to Appear Pro Hac Vice for Martha B. Chovanes (Fee Paid: $100, receipt number A26666271) Filed by Creditor CPC Management, Inc. d/b/a Germantown Cab Company (Monsour, Trey) (Entered: 11/17/2025)
11/17/2025	740 (1 pg)	Order Setting Hearing, Signed on 11/17/2025 (Related document(s):563 Motion to Extend Time) **Hearing scheduled for 12/11/2025 at 11:45 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/17/2025)
11/17/2025	741 (9 pgs)	*Withdrawn* First Objection *LIMITED OBJECTION AND RESERVATION OF RIGHTS OF HEXAWARE TECHNOLOGIES LIMITED TO THE NOTICE OF POTENTIAL ASSUMPTION OF CERTAIN OF DEBTORS EXECUTORY CONTRACTS AND UNEXPIRED LEASES*. Filed by Hexaware Technologies Limited (Billingsley, James)Modified on 12/17/2025 (abh4). (Entered: 11/17/2025)
11/17/2025	742 (3 pgs)	OBJECTION to Notice of Potential Assumption of Executory Contract and Cure Amount by American Professional Ambulance (dah4) (Entered: 11/17/2025)
11/17/2025	743 (8 pgs; 2 docs)	*Withdrawn* Objection *Genesys Cloud Services Inc. Objection To Notice Of Potential Assumption Of Certain Of Debtors' Executory Contracts And Unexpired Leases*. Filed by Genesys Cloud Services Inc (Attachments: # 1 Certificate of Service) (Rieger, Shannon)Modified on 2/18/2026 (abh4). (Entered: 11/17/2025)
11/17/2025	744 (8 pgs)	Certificate *of Service re: Notice of Second Modified Ordinary Course Professional Schedule* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):693 Notice) (Gershbein, Evan) (Entered: 11/17/2025)
11/17/2025	745 (9 pgs; 2 docs)	Motion *of Debtors for Entry of an Order Further Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/17/2025)
11/18/2025	746 (1 pg)	Order Granting Motion for Martha B. Chovanes To Appear pro hac vice (Related Doc # 739) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/18/2025. (tjl4) (Entered: 11/18/2025)

11/17/2025	747 (7 pgs)	Limited Objection by The Ronald McDonald House Entities (Related document(s):605 Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases (th4) (Entered: 11/18/2025)
11/18/2025	748 (424 pgs)	Certificate *of Service re: Notice of Potential Assumption of Certain of Debtors Executory Contracts and Unexpired Leases* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):605 Notice) (Gershbein, Evan) (Entered: 11/18/2025)
11/19/2025	749 (16 pgs)	Objection *Limited Objection of Elevance Health, Inc. to Assumption or Assumption and Assignment of Executory Contracts*. Filed by Elevance Health, Inc. (Welsh, Jaime) (Entered: 11/19/2025)
11/18/2025	750 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by McDowell County Rescue Squad and Ambulance (Related document(s):605 Notice) (bow4) (Entered: 11/19/2025)
11/18/2025	751 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Providence Transportation Inc (Related document(s):605 Notice) (bow4) (Entered: 11/19/2025)
11/19/2025	752 (3 pgs)	Motion to Extend Time *to File Objections and for Entry of an Order* Filed by Interested Party McDowell County Rescue Squad and Ambulance (mmm4) (Entered: 11/19/2025)
11/19/2025	753 (4 pgs)	Notice *Of Reservation Of Rights Regarding Fee Applications of White & Case and AlixPartners*. (Related document(s):666 Statement, 684 Statement) Filed by First Lien Agent, Consenting Creditors, and DIP Lenders (Patterson, Johnie) (Entered: 11/19/2025)
11/18/2025	754 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party American Legion Ambulance (dah4) (Entered: 11/20/2025)
11/18/2025	755 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Alleghany County EMS (dah4) (Entered: 11/20/2025)
11/18/2025	756 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Parties Caldwell County Ambulance (cak4) (Entered: 11/20/2025)
11/18/2025	757 (2 pgs)	Objection *to Potential Assumption of Contract and Proposed Cure Amount (Related document(s): 605 Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases.)*. Filed by McDowell County Rescue Squad and Ambulance (anc4) (Entered: 11/20/2025)
11/18/2025	758 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Caldwell County Ambulance 605 (cak4) (Entered: 11/20/2025)

11/18/2025	759 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Catawba County EMS (cak4) (Entered: 11/20/2025)
11/18/2025	760 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Wake County EMS (mew4) (Entered: 11/20/2025)
11/18/2025	761 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Interested Party McDowell County Rescue Squad and Ambulance (anc4) (Entered: 11/20/2025)
11/18/2025	762 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Gaston County Emergency Medical Services (cak4) (Entered: 11/20/2025)
11/18/2025	763 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by LifeStar Emergency Services. (Related document(s):605 Notice) (anc4)Modified on 11/21/2025 (anc4). (Entered: 11/20/2025)
11/18/2025	764 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Lifestar Response of Maryland, Inc. (anc4) (Entered: 11/20/2025)
11/18/2025	765 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Providence Transportation Inc (mew4) (Entered: 11/20/2025)
11/18/2025	766 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Henderson County Rescue Squad (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	767 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Jackson County Fire Rescue (cak4) (Entered: 11/20/2025)
11/18/2025	768 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party On Time Ambulance (mew4) (Entered: 11/20/2025)
11/18/2025	769 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Henderson County Rescue Squad (anc4) (Entered: 11/20/2025)

11/18/2025	770 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Columbus Transport Inc (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	771 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Columbus Transport Inc (anc4) (Entered: 11/20/2025)
11/18/2025	772 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party KIWI Emergency Medical Services (cak4) (Entered: 11/20/2025)
11/18/2025	773 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Cherokee County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	774 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Cherokee County EMS (anc4) (Entered: 11/20/2025)
11/18/2025	775 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Miller EMS LLC (mew4) (Entered: 11/20/2025)
11/18/2025	776 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Lincoln County EMS (cak4) (Entered: 11/20/2025)
11/18/2025	777 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by American Legion Ambulance (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	778 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Alleghany County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	779 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Catawba County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	780 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Gaston County Emergency Medical Services (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)

11/18/2025	781 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Jackson County Fire Rescue (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	782 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by KIWI Emergency Medical Services (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	783 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Lincoln County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	784 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Miller EMS LLC (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	785 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by On Time Ambulance (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	786 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Wake County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/20/2025	787 (2 pgs)	Notice *of Pretrial Conference to be Held on November 21, 2025, at 2:00 P.M.* Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/20/2025)
11/20/2025	788 (8 pgs)	Certificate *of Service re: 1) Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025; and 2) Motion of Debtors for Entry of an Order Further Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):734 Order on Application to Employ, 745 Generic Motion) (Gershbein, Evan) (Entered: 11/20/2025)
11/20/2025	789 (8 pgs)	Certificate *of Service re: Notice of Pretrial Conference to be Held on November 21, 2025, at 2:00 p.m.* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):787 Notice) (Gershbein, Evan) (Entered: 11/20/2025)
11/20/2025	790 (10 pgs)	Objection */ Debtors' Objection to Motion of Lisa Sallaj for Relief From Stay* (related document(s):657 Motion for Relief From Stay). Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/20/2025)
11/21/2025	791 (9 pgs)	Statement *Verified Statement Pursuant to Bankruptcy Rule 2019* (Filed By First Lien Agent and Consenting Creditors). (Warren, Matthew) (Entered: 11/21/2025)
11/21/2025	792 (10 pgs; 2 docs)	Response/Objection Filed by AmeriHealth Caritas Health Plan, Keystone Family Health Plan. (Related document(s):605 Notice) (Attachments: # 1 Certificate of Service) (Weis, Martin) (Entered: 11/21/2025)

11/21/2025	793 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by First Lien Lenders and Consenting Creditors. This is to order a transcript of 11/21/2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Electronically forwarded to Judicial Transcribers of Texas on 11/21/2025. Estimated completion date: 11/24/2025. Modified on 11/21/2025 (sew4). (Entered: 11/21/2025)
11/21/2025	794 (1 pg)	Courtroom Minutes. Time Hearing Held: 2:00 pm - 2:20 pm. Appearances: See attached. Additional appearances: George Kildonas Ray Schrock, Jamie Wine for the Debtors. Continued hearing scheduled for 11/25/25 at 5:00 pm on discovery issues involving privilege. (Related document(s):445 Amended Chapter 11 Plan) **Hearing scheduled for 11/25/2025 at 05:00 PM at telephone and video conference.** (tjl4) (Entered: 11/21/2025)
11/21/2025	795 (1 pg)	PDF with attached Audio File. Court Date & Time [11/21/2025 1:57:49 PM]. File Size [11158 KB]. Run Time [00:23:15]. (admin). (Entered: 11/21/2025)
11/21/2025	796 (1 pg)	MOTION to Appear Pro Hac Vice for Kenneth Thomas (Fee Paid: $100, receipt number C26683065) Filed by Creditor Humana Inc., Humana Insurance Company, and their affiliates (Thomas, Kenneth) (Entered: 11/21/2025)
11/21/2025	797 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 18, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 605 Notice, 748 Certificate) (Gershbein, Evan) (Entered: 11/21/2025)
11/24/2025	798 (1 pg)	Order Granting Motion for Kenneth Thomas To Appear pro hac vice (Related Doc # 796) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/24/2025. (tjl4) (Entered: 11/24/2025)
11/24/2025	799 (1 pg)	MOTION to Appear Pro Hac Vice for Colin T. West (Fee Paid: $100, receipt number A26686102) Filed by Creditor Committee Official Committee Of Unsecured Creditors (West, Colin) (Entered: 11/24/2025)
11/24/2025	800 (1 pg)	Order Setting Hearing, Signed on 11/24/2025 (Related document(s):657 Motion for Relief From Stay, 663 Generic Application) **Hearing scheduled for 12/18/2025 at 11:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/24/2025)
11/24/2025	801 (3253 pgs)	Certificate *of Service re Solicitation Materials* (Filed By ModivCare Inc.).(Related document(s):457 Order Setting Hearing, 465 Amended Chapter 11 Plan, 550 Amended Disclosure Statement, 552 Generic Order) (Gershbein, Evan) (Entered: 11/24/2025)
11/24/2025	802 (50 pgs)	Notice *of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):465 Amended Chapter 11 Plan, 725 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/24/2025)

11/24/2025	803 (6 pgs)	Declaration re: *Supplemental Declaration of Daniel B. Silvers, Investigating Director of Modivcare, Inc., in Support of Joint Chapter 11 Plan of Reorganization of Modivcare Inc., and its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):687 Declaration) (Tomasco, Patricia) (Entered: 11/24/2025)
11/24/2025	804 (42 pgs)	Response (Filed By Official Committee Of Unsecured Creditors). (Related document(s):687 Declaration) (West, Colin) (Entered: 11/24/2025)
11/24/2025	805 (1 pg)	Sealed Document / *Exhibits A-C to Letter Response Regarding Silvers Declaration in Support of Joint Chapter 11 Plan of Reorganization [Docket Nos. 687, 804]* (Filed By Official Committee Of Unsecured Creditors). (West, Colin) (Entered: 11/24/2025)
11/24/2025	806 (55 pgs)	Notice / *Official Committee of Unsecured Creditors' First Supplement to Lien Challenge Motion*. (Related document(s):729 Sealed Document) Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/24/2025)
11/24/2025	807 (59 pgs)	Brief (Filed By ModivCare Inc.).(Related document(s):794 Courtroom Minutes) (Tomasco, Patricia) (Entered: 11/24/2025)
11/25/2025	808 (7 pgs)	Objection *and Reservation of Rights to Debtors' Plan of Reorganization (DN 465)*. Filed by Endurance American Specialty Insurance Company (Walker, Worthy) (Entered: 11/25/2025)
11/25/2025	809 (1 pg)	Order Granting Motion for Colin T. West To Appear pro hac vice (Related Doc # 799) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/25/2025. (tjl4) (Entered: 11/25/2025)
11/25/2025	810 (5 pgs)	Objection to Confirmation of Plan Filed by US Trustee. (Related document(s):465 Amended Chapter 11 Plan) (Whitworth, Jana) (Entered: 11/25/2025)
11/25/2025	811 (3 pgs)	Notice of Appearance and Request for Notice Filed by Ryan E Chapple Filed by on behalf of Marybeth Duran as Personal Representative of the Estate of Richard Chavez (Chapple, Ryan) (Entered: 11/25/2025)
11/25/2025	812 (5 pgs)	Objection to Confirmation of Plan Filed by Marybeth Duran as Personal Representative of the Estate of Richard Chavez. (Related document(s):465 Amended Chapter 11 Plan, 802 Notice) (Chapple, Ryan) (Entered: 11/25/2025)
11/25/2025	813 (13 pgs)	Certificate *of Service re: 1) Notice of Third Modified Ordinary Course Professional Schedule; 2) Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors in Possession as of the Petition Date; 3) Debtors Motion for Entry of an Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief; and 4) Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):712 Notice, 716 Order on

		Application to Employ, 722 Motion to Extend Time, 725 Notice) (Gershbein, Evan) (Entered: 11/25/2025)
11/25/2025	814 (21 pgs)	Response/Objection Filed by Salesforce, Inc.. (Related document(s):605 Notice) (Chou, Emily) (Entered: 11/25/2025)
11/25/2025	815 (7 pgs)	Declaration re: *Declaration of Kevin Ramirez in Support of Objection of Salesforce, Inc. to the Potential Assumption of Certain Executory Contracts and Cure Costs, in Connection with the Plan and Reservation of Rights* (Filed By Salesforce, Inc.).(Related document(s):814 Response/Objection) (Chou, Emily) (Entered: 11/25/2025)
11/25/2025	816 (25 pgs)	Certificate *of Service (Supplemental) re Solicitation Materials* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 465 Amended Chapter 11 Plan, 505 Order on Application to Employ, 552 Generic Order, 801 Certificate) (Gershbein, Evan) (Entered: 11/25/2025)
11/25/2025	817 (8 pgs)	Response/Objection Filed by Humana Inc., Humana Insurance Company, and their affiliates. (Related document(s):605 Notice) (Thomas, Kenneth) (Entered: 11/25/2025)
11/25/2025	818 (7 pgs)	Objection to Confirmation of Plan Filed by Humana Inc., Humana Insurance Company, and their affiliates. (Related document(s):465 Amended Chapter 11 Plan) (Thomas, Kenneth) (Entered: 11/25/2025)
11/25/2025	819 (8 pgs)	Objection *TO THE FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES*. Filed by The Chubb Companies (Billingsley, James) (Entered: 11/25/2025)
11/25/2025	820 (1 pg)	Sealed Document / *Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	821 (11 pgs)	Declaration re: / *Declaration of Erin M. Smith in Support of the Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):820 Sealed Document) (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	822 (10 pgs; 10 docs)	Sealed Document / *Exhibits A-I to Declaration of Erin M. Smith in Support of the Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I) (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	823 (1 pg)	Sealed Document *Notice of Filing of Expert Report of Mr. Zul Jamal in Support of Confirmation of Debtors' Plan* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)

11/25/2025	824 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by ModivCare Inc.. This is to order a transcript of Status Conference 11.25.25 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Access Transcripts (Filed By ModivCare Inc.). (Bell, Brandon) Electronically forwarded to Access Transcripts on 11/26/2025. Estimated completion date: 11/29/2025. Modified on 11/26/2025 (sew4). (Entered: 11/25/2025)
11/25/2025	825 (1 pg)	Courtroom Minutes. Time Hearing Held: 5:00 pm - 5:27 pm. Appearances: See attached. Additional appearances: Deborah Newman. Jamie Wine for the Debtor. Collin Webster. The Court heard oral argument on discovery from the parties. Parties may reach out to the case manager if a further status conference is required. (Related document(s):794 Courtroom Minutes) (tjl4) (Entered: 11/25/2025)
11/25/2025	826 (8 pgs)	Certificate *of Service re: Debtors Objection to Motion of Lisa Sallaj for Relief from Stay* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):790 Objection) (Gershbein, Evan) (Entered: 11/25/2025)
11/25/2025	827 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $25511776 disbursed (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	828 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $1082558 disbursed (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	829 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $4438295 disbursed (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	830 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $181451089 disbursed (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	831 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $54127363 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	832 (1 pg)	Sealed Document / *First Supplemental Declaration of George Klidonas Providing Additional Disclosures Related to the Retention of Latham & Watkins LLP as Bankruptcy Counsel* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	833 (1 pg)	Sealed Document / *First Supplemental Declaration of Zul Jamal in Connection With Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	834 (10 pgs)	Declaration re: *First Supplemental Declaration of George Klidonas Providing Additional Disclosures Related to the Retention of Latham & Watkins LLP as Bankruptcy Counsel* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)

11/25/2025	835 (8 pgs)	Declaration re: *First Supplemental Declaration of Zul Jamal in Connection With Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	836 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	837 (7 pgs; 2 docs)	Motion to Seal / *Debtors' Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	838 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	839 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	840 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	841 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	842 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	843 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	844 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	845 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	846 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	847 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 11/25/2025)

11/25/2025	848 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	849 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	850 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	851 (50 pgs)	Objection *of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc., and Its Debtor Affiliates [REDACTED]*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	852 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	853 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	854 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	855 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	856 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/26/2025	857 (1 pg)	Order Continuing Hearing (Time Change Only), Signed on 11/26/2025 (Related document(s):563 Motion to Extend Time) **Hearing scheduled for 12/11/2025 at 11:30 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/26/2025)
11/26/2025	858 (11 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):660 Sealed Motion, 661 Generic Motion) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	859 (1 pg)	PDF with attached Audio File. Court Date & Time [11/25/2025 4:59:43 PM]. File Size [13394 KB]. Run Time [00:27:54]. (admin). (Entered: 11/26/2025)

11/26/2025	860 (5 pgs)	Witness List (Filed By Official Committee Of Unsecured Creditors). (Related document(s):548 Generic Order) (Koster, Charles) (Entered: 11/26/2025)
11/26/2025	861 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the November 25, 2025 Proceeding before Judge Alfredo R. Perez. Court Reporter/Transcriber: Access Transcripts (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Access Transcripts on 12/1/25. Estimated completion date: 12/2/25. Modified on 12/1/2025 (anc4). (Entered: 11/26/2025)
11/26/2025	862 (3 pgs)	Witness List (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) (Entered: 11/26/2025)
11/26/2025	863 (4 pgs)	Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief, Signed on 11/26/2025 (Related document(s):660 Sealed Motion, 661 Generic Motion) (tjl4) (Entered: 11/26/2025)
11/26/2025	864 (3 pgs)	Witness List (Filed By ModivCare Inc.).(Related document(s):548 Generic Order) (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	865 (1 pg)	Sealed Document / *Supplemental Declaration of Chad J. Shandler in Support of the Application of Debtors for Entry of an Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for Debtors Effective as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	866 (11 pgs)	Declaration re: *Supplemental Declaration of Chad J. Shandler in Support of the Application of Debtors for Entry of an Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for Debtors Effective as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	867 (1 pg)	Sealed Document *Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection With Debtors' Insurance Programs*, Stipulation By ModivCare Inc. and Ace American Insurance Company and ESIS, Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	868 (22 pgs)	Stipulation By ModivCare Inc. and ACE American Insurance Company and ESIS, Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	869 (7 pgs; 2 docs)	Motion to Seal / *Debtors' Motion to File Under Seal Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection With Debtors' Insurance Programs* Filed by Debtor

		ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/26/2025)
11/28/2025	870 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 11/28/2025)
11/28/2025	871 (12 pgs)	Certificate *of Service re: 1) Notice of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 2) Supplemental Declaration of Daniel B. Silvers, Investigating Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):802 Notice, 803 Declaration) (Gershbein, Evan) (Entered: 11/28/2025)
11/28/2025	872 (9 pgs)	Certificate *of Service re: 1) First Supplemental Declaration of George Klidonas Providing Additional Disclosures Related to the Retention of Latham & Watkins LLP as Bankruptcy Counsel; 2) First Supplemental Declaration of Zul Jamal in Connection with Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date; and 3) Debtors Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):834 Declaration, 835 Declaration, 837 Motion to Seal) (Gershbein, Evan) (Entered: 11/28/2025)
11/30/2025	873 (19 pgs)	BNC Certificate of Mailing. (Related document(s):863 Generic Order) No. of Notices: 104. Notice Date 11/30/2025. (Admin.) (Entered: 11/30/2025)
12/01/2025	874 (2 pgs)	Order Granting Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal (Related Doc # 662), Signed on 12/1/2025. (abh4) (Entered: 12/01/2025)
12/01/2025	875 (18 pgs; 2 docs)	Transcript RE: Pretrial Conference held on November 21, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/2/2026. (mhen) (Entered: 12/01/2025)
12/01/2025	876 (3 pgs)	Notice *of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/01/2025)
12/02/2025	877 (4 pgs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/02/2025)
12/02/2025	878 (1 pg)	MOTION to Appear Pro Hac Vice for Donald V. Valenzano Jr. Esq. (Fee Paid: $100, receipt number A26705438) Filed by Creditor Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties (Bressler, Gary) (Main Document 878 replaced on 12/3/2025) (AkeitaHouse). (Entered: 12/02/2025)

12/02/2025	879 (10 pgs; 2 docs)	Motion / *Debtors' Motion for Entry of an Order Extending Time to Assume or to Reject Unexpired Leases of Nonresidential Real Property* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/02/2025)
12/02/2025	880 (2 pgs)	Notice *of Status Conference to be Held on December 3, 2025, at 8:00 A.M.* (Related document(s):465 Amended Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/02/2025)
12/01/2025	881 (8 pgs)	Response *to Debtor's Objection to Motion of Lisa Sallaj for Relief from Stay* (related document(s):657 Motion for Relief From Stay and 790 Objection / Debtors' Objection to Motion of Lisa Sallaj for Relief From Stay). Filed by Lisa Sallaj (amp4) (Entered: 12/02/2025)
12/02/2025	882 (92 pgs; 6 docs)	Statement / *White & Case LLP's Second Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2025 to and Including October 31, 2025* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Koster, Charles) (Entered: 12/02/2025)
12/02/2025	883 (12 pgs; 3 docs)	Statement *Letter from Daniel B. Silvers, director of ModivCare Inc. to Judge Perez* (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A # 2 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	884 (283 pgs; 8 docs)	Reply *to Objection to Claim 1678 and 1679*. Filed by Alea Rachel Kennedy (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit D (con't) # 6 Exhibit D (con't) # 7 Exhibit D (con't)) (anc4) (Entered: 12/02/2025)
12/02/2025	885 (5 pgs; 5 docs)	Sealed Document *Letter from Daniel B. Silvers, a director of Mondivcare Inc. to Judge Perez* (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A-part 1 # 2 Exhibit A-part 2 # 3 Exhibit A-part 3 # 4 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	886 (9 pgs; 3 docs)	Statement *Letter from Daniel B. Silvers, a director of ModivCare Inc. to Judge Perez with Amended Exhibit B* (Filed By ModivCare Inc.). (Related document(s):883 Statement) (Attachments: # 1 Exhibit B # 2 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	887 (5 pgs; 5 docs)	Sealed Document *Letter from Daniel B. Silvers, a director of ModivCare Inc. with an Amended Exhibit B* (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A, Part 1 # 2 Exhibit A-Part 2 # 3 Exhibit A-Part 3 # 4 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	888 (5 pgs; 2 docs)	Motion to Seal *the December 2, 2025, Letter to the Court* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	889 (16 pgs)	Certificate *of Service re: Documents Served on November 26, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):618 Debtor-in-Possession Monthly Operating Report, 619 Debtor-in-Possession Monthly Operating Report, 620 Debtor-in-Possession Monthly Operating Report, 621 Debtor-in-Possession Monthly Operating Report, 622 Debtor-in-Possession Monthly Operating Report, 623 Debtor-in-Possession Monthly Operating Report, 624

		Debtor-in-Possession Monthly Operating Report, 625 Debtor-in-Possession Monthly Operating Report, 626 Debtor-in-Possession Monthly Operating Report, 627 Debtor-in-Possession Monthly Operating Report, 628 Debtor-in-Possession Monthly Operating Report, 629 Debtor-in-Possession Monthly Operating Report, 630 Debtor-in-Possession Monthly Operating Report, 631 Debtor-in-Possession Monthly Operating Report, 632 Debtor-in-Possession Monthly Operating Report, 633 Debtor-in-Possession Monthly Operating Report, 634 Debtor-in-Possession Monthly Operating Report, 635 Debtor-in-Possession Monthly Operating Report, 636 Debtor-in-Possession Monthly Operating Report, 637 Debtor-in-Possession Monthly Operating Report, 638 Debtor-in-Possession Monthly Operating Report, 639 Debtor-in-Possession Monthly Operating Report, 640 Debtor-in-Possession Monthly Operating Report, 641 Debtor-in-Possession Monthly Operating Report, 827 Debtor-in-Possession Monthly Operating Report, 828 Debtor-in-Possession Monthly Operating Report, 829 Debtor-in-Possession Monthly Operating Report, 830 Debtor-in-Possession Monthly Operating Report, 831 Debtor-in-Possession Monthly Operating Report, 836 Debtor-in-Possession Monthly Operating Report, 838 Debtor-in-Possession Monthly Operating Report, 839 Debtor-in-Possession Monthly Operating Report, 840 Debtor-in-Possession Monthly Operating Report, 841 Debtor-in-Possession Monthly Operating Report, 842 Debtor-in-Possession Monthly Operating Report, 843 Debtor-in-Possession Monthly Operating Report, 844 Debtor-in-Possession Monthly Operating Report, 845 Debtor-in-Possession Monthly Operating Report, 846 Debtor-in-Possession Monthly Operating Report, 847 Debtor-in-Possession Monthly Operating Report, 848 Debtor-in-Possession Monthly Operating Report, 849 Debtor-in-Possession Monthly Operating Report, 850 Debtor-in-Possession Monthly Operating Report, 852 Debtor-in-Possession Monthly Operating Report, 853 Debtor-in-Possession Monthly Operating Report, 854 Debtor-in-Possession Monthly Operating Report, 855 Debtor-in-Possession Monthly Operating Report, 856 Debtor-in-Possession Monthly Operating Report, 863 Generic Order, 864 Witness List, 866 Declaration, 868 Stipulation, 869 Motion to Seal) (Gershbein, Evan) (Entered: 12/02/2025)
12/03/2025	890 (2 pgs)	Witness List (Filed By US Trustee).(Related document(s):552 Generic Order) (Whitworth, Jana) (Entered: 12/03/2025)
12/03/2025	891 (2 pgs)	Statement / *Letter to the Court by the Committee re: Response to Letter of Daniel B. Silvers, Investigating Director of ModivCare Inc.* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):883 Statement, 886 Statement) (West, Colin) (Entered: 12/03/2025)
12/03/2025	892 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:00 am to 8:31 am. Appearances: see log. Additional appearances: Deborah Newman, Christopher "Chris" Shore, and Kristopher "Kris" Hansen. Status conference held. Oral argument heard on the record. No action taken by the Court. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan) (abh4) (Entered: 12/03/2025)
12/03/2025	893 (1 pg)	Order Granting Motion for Donald V. Valenzano, Jr. To Appear pro hac vice (Related Doc # 878) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/3/2025. (abh4) (Entered: 12/03/2025)

12/03/2025	894 (1 pg)	PDF with attached Audio File. Court Date & Time [12/3/2025 8:00:15 AM]. File Size [14462 KB]. Run Time [00:30:08]. (admin). (Entered: 12/03/2025)
12/03/2025	895 (1 pg)	MOTION to Appear Pro Hac Vice for Phillip A. Martin (Fee Paid: $100, receipt number A26708516) Filed by Creditor Endurance American Specialty Insurance Company (Martin, Phillip) (Entered: 12/03/2025)
12/03/2025	896 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the November 21, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas 12/3/2025. Estimated completion date: 12/4/2025. Modified on 12/3/2025 (sew4). (Entered: 12/03/2025)
12/03/2025	897 (112 pgs; 3 docs)	Statement / *Second Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from October 1, 2025 Through October 31, 2025* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B) (Koster, Charles) (Entered: 12/03/2025)
12/03/2025	898 (21 pgs; 2 docs)	Transcript RE: Discovery Conference held on 11/25/25 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/3/2026. (AccessTranscripts) (Entered: 12/03/2025)
12/04/2025	899 (1 pg)	Order Granting Motion for Phillip A. Martin To Appear pro hac vice (Related Doc # 895) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/4/2025. (abh4) (Entered: 12/04/2025)
12/04/2025	900 (3 pgs)	Witness List, Exhibit List (Filed By Humana Inc., Humana Insurance Company, and their affiliates).(Related document(s):552 Generic Order) (Thomas, Kenneth) (Entered: 12/04/2025)
12/04/2025	901 (157 pgs; 6 docs)	Exhibit List, Witness List (Filed By Marybeth Duran as Personal Representative of the Estate of Richard Chavez).(Related document(s):465 Amended Chapter 11 Plan) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5) (Chapple, Ryan) (Entered: 12/04/2025)
12/04/2025	902 (36 pgs)	Exhibit List (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document, 732 Generic Motion, 733 Generic Motion) (Davidson, Timothy) (Entered: 12/04/2025)

12/04/2025	903 (35 pgs; 11 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	904 (265 pgs; 41 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 11 # 2 Exhibit 12 # 3 Exhibit 13 # 4 Exhibit 14 # 5 Exhibit 15 # 6 Exhibit 16 # 7 Exhibit 17 # 8 Exhibit 18 # 9 Exhibit 19 # 10 Exhibit 20 # 11 Exhibit 21 # 12 Exhibit 22 # 13 Exhibit 23 # 14 Exhibit 24 # 15 Exhibit 25 # 16 Exhibit 26 # 17 Exhibit 27 # 18 Exhibit 28 # 19 Exhibit 29 # 20 Exhibit 30 # 21 Exhibit 31 # 22 Exhibit 32 # 23 Exhibit 33 # 24 Exhibit 34 # 25 Exhibit 35 # 26 Exhibit 36 # 27 Exhibit 37 # 28 Exhibit 38 # 29 Exhibit 39 # 30 Exhibit 40 # 31 Exhibit 41 # 32 Exhibit 42 # 33 Exhibit 43 # 34 Exhibit 44 # 35 Exhibit 45 # 36 Exhibit 46 # 37 Exhibit 47 # 38 Exhibit 48 # 39 Exhibit 49 # 40 Exhibit 50) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	905 (78 pgs; 51 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 51 # 2 Exhibit 52 # 3 Exhibit 53 # 4 Exhibit 54 # 5 Exhibit 55 # 6 Exhibit 56 # 7 Exhibit 57 # 8 Exhibit 58 # 9 Exhibit 59 # 10 Exhibit 60 # 11 Exhibit 61 # 12 Exhibit 62 # 13 Exhibit 63 # 14 Exhibit 64 # 15 Exhibit 65 # 16 Exhibit 66 # 17 Exhibit 67 # 18 Exhibit 68 # 19 Exhibit 69 # 20 Exhibit 70 # 21 Exhibit 71 # 22 Exhibit 72 # 23 Exhibit 73 # 24 Exhibit 74 # 25 Exhibit 75 # 26 Exhibit 76 # 27 Exhibit 77 # 28 Exhibit 78 # 29 Exhibit 79 # 30 Exhibit 80 # 31 Exhibit 81 # 32 Exhibit 82 # 33 Exhibit 83 # 34 Exhibit 84 # 35 Exhibit 85 # 36 Exhibit 86 # 37 Exhibit 87 # 38 Exhibit 88 # 39 Exhibit 89 # 40 Exhibit 90 # 41 Exhibit 91 # 42 Exhibit 92 # 43 Exhibit 93 # 44 Exhibit 94 # 45 Exhibit 95 # 46 Exhibit 96 # 47 Exhibit 97 # 48 Exhibit 98 # 49 Exhibit 99 # 50 Exhibit 100) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	906 (151 pgs; 51 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 101 # 2 Exhibit 102 # 3 Exhibit 103 # 4 Exhibit 104 # 5 Exhibit 105 # 6 Exhibit 106 # 7 Exhibit 107 # 8 Exhibit 108 # 9 Exhibit 109 # 10 Exhibit 110 # 11 Exhibit 111 # 12 Exhibit 112 # 13 Exhibit 113 # 14 Exhibit 114 # 15 Exhibit 115 # 16 Exhibit 116 # 17 Exhibit 117 # 18 Exhibit 118 # 19 Exhibit 119 # 20 Exhibit 120 # 21 Exhibit 121 # 22 Exhibit 122 # 23 Exhibit 123 # 24 Exhibit 124 # 25 Exhibit 125 # 26 Exhibit 126 # 27 Exhibit 127 # 28 Exhibit 128 # 29 Exhibit 129 # 30 Exhibit 130 # 31 Exhibit 131 # 32 Exhibit 132 # 33 Exhibit 133 # 34 Exhibit 134 # 35 Exhibit 135 # 36 Exhibit 136 # 37 Exhibit 137 # 38 Exhibit 138 # 39 Exhibit 139 # 40 Exhibit 140 # 41 Exhibit 141 # 42 Exhibit 142 # 43 Exhibit 143 # 44 Exhibit 144 # 45 Exhibit 145 # 46 Exhibit 146 # 47 Exhibit 147 # 48 Exhibit 148 # 49 Exhibit 149 # 50 Exhibit 150) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	907 (2571 pgs; 41 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 151 # 2 Exhibit 152 # 3 Exhibit 153 # 4 Exhibit 154 # 5 Exhibit 155 # 6 Exhibit 156 # 7 Exhibit 157 # 8 Exhibit 158 # 9 Exhibit 159 # 10 Exhibit 160 # 11 Exhibit 161 # 12 Exhibit 162 # 13 Exhibit 163 # 14 Exhibit 164 # 15 Exhibit 165 # 16 Exhibit 166 # 17 Exhibit 167 # 18 Exhibit 168 # 19 Exhibit 169 # 20 Exhibit 170 # 21 Exhibit 171 # 22 Exhibit 172 # 23 Exhibit 173 # 24 Exhibit 174 # 25 Exhibit 175 # 26 Exhibit 176 # 27 Exhibit 177 # 28 Exhibit 178 # 29 Exhibit 179 # 30 Exhibit 180 # 31 Exhibit 181 # 32 Exhibit 182 # 33 Exhibit 183 # 34 Exhibit 184 # 35 Exhibit 185 # 36

		Exhibit 186 # 37 Exhibit 187 # 38 Exhibit 188 # 39 Exhibit 189 # 40 Exhibit 190) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	908 (2033 pgs; 38 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 191 # 2 Exhibit 192 # 3 Exhibit 193 # 4 Exhibit 194 # 5 Exhibit 195 # 6 Exhibit 196 # 7 Exhibit 197 # 8 Exhibit 198 # 9 Exhibit 199 # 10 Exhibit 200 - Filed Under Seal # 11 Exhibit 201 # 12 Exhibit 202 # 13 Exhibit 203 # 14 Exhibit 204 # 15 Exhibit 205 # 16 Exhibit 206 # 17 Exhibit 207 # 18 Exhibit 208 # 19 Exhibit 209 # 20 Exhibit 210 # 21 Exhibit 211 # 22 Exhibit 212 # 23 Exhibit 213 # 24 Exhibit 214 # 25 Exhibit 215 # 26 Exhibit 216 # 27 Exhibit 217 # 28 Exhibit 218 # 29 Exhibit 219 # 30 Exhibit 220 # 31 Exhibit 221 # 32 Exhibit 222 # 33 Exhibit 223 # 34 Exhibit 224 # 35 Exhibit 225 # 36 Exhibit 226 # 37 Exhibit 227) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	909 (11 pgs; 11 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 - Part 1 # 9 Exhibit 8 - Part 2 # 10 Exhibit 8 - Part 3) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	910 (19 pgs; 19 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 8 - part 4 # 2 Exhibit 8 - part 5 # 3 Exhibit 9 # 4 Exhibit 10 # 5 Exhibit 11 # 6 Exhibit 12 # 7 Exhibit 13 # 8 Exhibit 14 # 9 Exhibit 15 # 10 Exhibit 16 # 11 Exhibit 17 # 12 Exhibit 18 # 13 Exhibit 19 # 14 Exhibit 20 # 15 Exhibit 21 # 16 Exhibit 22 # 17 Exhibit 23 # 18 Exhibit 25) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	911 (16 pgs; 16 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 26 # 2 Exhibit 27 # 3 Exhibit 28 # 4 Exhibit 29 # 5 Exhibit 30 # 6 Exhibit 31 # 7 Exhibit 32 # 8 Exhibit 33 # 9 Exhibit 34 # 10 Exhibit 35 # 11 Exhibit 36 # 12 Exhibit 37 # 13 Exhibit 38 # 14 Exhibit 39 # 15 Exhibit 40) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	912 (426 pgs; 26 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 41 # 2 Exhibit 42 # 3 Exhibit 43 # 4 Exhibit 44 # 5 Exhibit 45 # 6 Exhibit 46 # 7 Exhibit 52 # 8 Exhibit 53 # 9 Exhibit 54 # 10 Exhibit 55 # 11 Exhibit 56 # 12 Exhibit 57 # 13 Exhibit 58 # 14 Exhibit 59 # 15 Exhibit 60 # 16 Exhibit 61 # 17 Exhibit 62 # 18 Exhibit 63 # 19 Exhibit 64 # 20 Exhibit 65 # 21 Exhibit 66 # 22 Exhibit 67 # 23 Exhibit 68 # 24 Exhibit 69 # 25 Exhibit 70) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	913 (8 pgs)	Certificate *of Service re: 1) Order Granting Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal; and 2) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita

		Global).(Related document(s):874 Order on Motion to Seal, 876 Notice) (Gershbein, Evan) (Entered: 12/04/2025)
12/04/2025	914 (33 pgs; 33 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 71 # 2 Exhibit 72 - Part 1 # 3 Exhibit 72 - Part 2 # 4 Exhibit 73 # 5 Exhibit 74 # 6 Exhibit 75 # 7 Exhibit 76 # 8 Exhibit 77 # 9 Exhibit 78 # 10 Exhibit 79 - Part 1 # 11 Exhibit 79 - Part 2 # 12 Exhibit 80 # 13 Exhibit 81 # 14 Exhibit 82 # 15 Exhibit 83 # 16 Exhibit 84 # 17 Exhibit 85 # 18 Exhibit 86 # 19 Exhibit 87 # 20 Exhibit 88 # 21 Exhibit 89 # 22 Exhibit 90 # 23 Exhibit 91 # 24 Exhibit 92 # 25 Exhibit 93 # 26 Exhibit 94 # 27 Exhibit 95 # 28 Exhibit 96 # 29 Exhibit 97 # 30 Exhibit 98 # 31 Exhibit 99 # 32 Exhibit 100) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	915 (32 pgs; 32 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 101 - Part 1 # 2 Exhibit 101 - Part 2 # 3 Exhibit 102 # 4 Exhibit 103 # 5 Exhibit 104 # 6 Exhibit 105 # 7 Exhibit 106 # 8 Exhibit 107 # 9 Exhibit 108 # 10 Exhibit 109 # 11 Exhibit 110 # 12 Exhibit 111 # 13 Exhibit 112 # 14 Exhibit 113 # 15 Exhibit 114 # 16 Exhibit 115 # 17 Exhibit 116 # 18 Exhibit 117 # 19 Exhibit 118 # 20 Exhibit 119 # 21 Exhibit 120 # 22 Exhibit 121 # 23 Exhibit 122 # 24 Exhibit 123 # 25 Exhibit 124 # 26 Exhibit 125 # 27 Exhibit 126 # 28 Exhibit 127 # 29 Exhibit 128 # 30 Exhibit 129 # 31 Exhibit 130) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	916 (47 pgs)	Declaration re: *Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of Modvicare Inc. and Its Debtor Affiliates* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/04/2025)
12/04/2025	917 (108 pgs; 8 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 131 # 2 Exhibit 132 # 3 Exhibit 133 # 4 Exhibit 134 # 5 Exhibit 135 # 6 Exhibit 136 # 7 Exhibit 137) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	918 (24 pgs; 24 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 138 # 2 Exhibit 139 # 3 Exhibit 140 # 4 Exhibit 141 # 5 Exhibit 142 # 6 Exhibit 143 # 7 Exhibit 144 # 8 Exhibit 145 # 9 Exhibit 146 # 10 Exhibit 147 # 11 Exhibit 148 # 12 Exhibit 149 # 13 Exhibit 150 # 14 Exhibit 151 # 15 Exhibit 152 # 16 Exhibit 153 # 17 Exhibit 154 # 18 Exhibit 155 # 19 Exhibit 156 # 20 Exhibit 157 # 21 Exhibit 158 # 22 Exhibit 159 # 23 Exhibit 160) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	919 (3182 pgs; 40 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 161 # 2 Exhibit 162 # 3 Exhibit 163 # 4 Exhibit 164 # 5 Exhibit 165 # 6 Exhibit 166 # 7 Exhibit 167 # 8 Exhibit 168 # 9 Exhibit 169 # 10 Exhibit 170 # 11 Exhibit 171 # 12 Exhibit 172 # 13 Exhibit 173 # 14 Exhibit 174 # 15 Exhibit 175 # 16

		Exhibit 176 # 17 Exhibit 177 # 18 Exhibit 178 # 19 Exhibit 179 # 20 Exhibit 180 # 21 Exhibit 181 # 22 Exhibit 182 # 23 Exhibit 183 # 24 Exhibit 184 # 25 Exhibit 185 # 26 Exhibit 186 # 27 Exhibit 187 # 28 Exhibit 188 # 29 Exhibit 189 # 30 Exhibit 190 # 31 Exhibit 191 # 32 Exhibit 192 # 33 Exhibit 193 # 34 Exhibit 194 # 35 Exhibit 195 # 36 Exhibit 196 # 37 Exhibit 197 # 38 Exhibit 198 # 39 Exhibit 199) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	920 (2 pgs; 2 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 200) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	921 (2 pgs; 2 docs)	Sealed Document *Debtors' Omnibus Brief (A) in Support of Plan Confirmation and (B) Objecting to Committee's Motions for Standing to Pursue Claims and Lien Challenges*, Brief (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A) (Davidson, Timothy) (Entered: 12/04/2025)
12/04/2025	922 (1411 pgs; 28 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 201 # 2 Exhibit 202 # 3 Exhibit 203 # 4 Exhibit 204 # 5 Exhibit 205 # 6 Exhibit 206 # 7 Exhibit 207 # 8 Exhibit 208 # 9 Exhibit 209 # 10 Exhibit 210 # 11 Exhibit 211 # 12 Exhibit 212 # 13 Exhibit 213 # 14 Exhibit 214 # 15 Exhibit 215 # 16 Exhibit 216 # 17 Exhibit 217 # 18 Exhibit 218 # 19 Exhibit 219 # 20 Exhibit 220 # 21 Exhibit 221 # 22 Exhibit 222 # 23 Exhibit 223 # 24 Exhibit 224 # 25 Exhibit 225 # 26 Exhibit 226 # 27 Exhibit 227) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	923 (39 pgs)	Statement *of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Affiliates and Joinder in Debtors' Reply Brief* (Filed By First Lien Agent and Consenting Creditors).(Related document(s):820 Sealed Document, 921 Sealed Document, Brief) (Warren, Matthew) (Entered: 12/04/2025)
12/04/2025	924 (16 pgs)	BNC Certificate of Mailing. (Related document(s):875 Transcript) No. of Notices: 104. Notice Date 12/04/2025. (Admin.) (Entered: 12/04/2025)
12/04/2025	925 (52 pgs)	Omnibus Response *of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (related document(s):728 Sealed Motion, 732 Generic Motion, 733 Generic Motion). Filed by First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 12/04/2025)
12/04/2025	926 (1242 pgs; 40 docs)	Declaration re: *Declaration of Matthew L. Warren in Support of: (I) Omnibus Response of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier*

		Transaction Claims and Causes of Action on Behalf of the Debtors Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors Estates and (B) Exclusive Settlement Authority ; and (ii) Statement of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and Joinder in Debtors Reply Brief (Filed By First Lien Agent and Consenting Creditors).(Related document(s):923 Statement, 925 Response) (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N # 15 Exhibit O # 16 Exhibit P # 17 Exhibit Q # 18 Exhibit R # 19 Exhibit S # 20 Exhibit T # 21 Exhibit U # 22 Exhibit V # 23 Exhibit W # 24 Exhibit X # 25 Exhibit Y # 26 Exhibit Z # 27 Exhibit AA # 28 Exhibit BB # 29 Exhibit CC # 30 Exhibit DD # 31 Exhibit DD-1 # 32 Exhibit DD-2 # 33 Exhibit DD-3 # 34 Exhibit DD-4 # 35 Exhibit DD-5 # 36 Exhibit DD-6 # 37 Exhibit EE # 38 Exhibit FF # 39 Exhibit GG) (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	927 (45 pgs; 45 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-001 # 2 DX-002 # 3 DX-003 # 4 DX-004 # 5 DX-005 # 6 DX-006 # 7 DX-007 # 8 DX-008 # 9 DX-009 # 10 DX-010 # 11 DX-011 # 12 DX-012 # 13 DX-013 # 14 DX-014 # 15 DX-015 # 16 DX-016 # 17 DX-017 # 18 DX-018 # 19 DX-019 # 20 DX-020 # 21 DX-021 # 22 DX-022 # 23 DX-023 # 24 DX-024 # 25 DX-025 # 26 DX-026 # 27 DX-027 # 28 DX-028 # 29 DX-029 # 30 DX-030 # 31 DX-031 # 32 DX-032 # 33 DX-033 # 34 DX-034 # 35 DX-035 # 36 DX-036 # 37 DX-037 # 38 DX-038 # 39 DX-039 # 40 DX-040 # 41 DX-041 # 42 DX-042 # 43 DX-043 # 44 DX-044) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	928 (46 pgs; 46 docs)	Sealed Document , Witness List (Filed By ModivCare Inc.). (Attachments: # 1 DX-045 # 2 DX-046 # 3 DX-047 # 4 DX-048 # 5 DX-049 # 6 DX-050 # 7 DX-051 # 8 DX-052 # 9 DX-053 # 10 DX-054 # 11 DX-055 # 12 DX-056 # 13 DX-057 # 14 DX-058 # 15 DX-059 # 16 DX-060 # 17 DX-061 # 18 DX-062 # 19 DX-063 # 20 DX-064 # 21 DX-065 # 22 DX-066 # 23 DX-067 # 24 DX-068 # 25 DX-069 # 26 DX-070 # 27 DX-071 # 28 DX-072 # 29 DX-073 # 30 DX-074 # 31 DX-075 # 32 DX-076 # 33 DX-077A # 34 DX-077B # 35 DX-078 # 36 DX-079 # 37 DX-080 # 38 DX-081 # 39 DX-082 # 40 DX-083 # 41 DX-084 # 42 DX-085 # 43 DX-086 # 44 DX-087 # 45 DX-088) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	929 (46 pgs; 46 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Dx-175 # 2 Dx-176 # 3 Dx-177 # 4 Dx-178 # 5 Dx-179 # 6 Dx-180 # 7 Dx-181 # 8 Dx-183 # 9 Dx-183 # 10 Dx-184 # 11 Dx-185 # 12 Dx-186 # 13 Dx-187 # 14 Dx-188 # 15 Dx-189 # 16 Dx-190 # 17 Dx-191 # 18 Dx-192 # 19 Dx-193 # 20 Dx-194 # 21 Dx-195 # 22 Dx-196 # 23 Dx-197 # 24 Dx-198 # 25 Dx-199 # 26 Dx-200 # 27 Dx-201 # 28 Dx-202 # 29 Dx-203 # 30 Dx-204 # 31 Dx-205 # 32 Dx-206 # 33 Dx-207 # 34 Dx-208 # 35 Dx-209 # 36 Dx-210 # 37 Dx-211 # 38 Dx-212 # 39 Dx-213 # 40 Dx-214 # 41 Dx-215 # 42 Dx-216 # 43 Dx-217 # 44 Dx-218 # 45 Dx-219) (Davidson, Timothy) (Entered: 12/05/2025)

12/05/2025	930 (44 pgs; 44 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-089 # 2 DX-090 # 3 DX-091 # 4 DX-092 # 5 DX-093 # 6 DX-094 # 7 DX-095 # 8 DX-096 # 9 DX-097 # 10 DX-098 # 11 DX-099 # 12 DX-100 # 13 DX-101 # 14 DX-102 # 15 DX-103 # 16 DX-104 # 17 DX-105 # 18 DX-106 # 19 DX-107 # 20 DX-108 # 21 DX-109 # 22 DX-110 # 23 DX-111 # 24 DX-112 # 25 DX-113 # 26 DX-114 # 27 DX-115 # 28 DX-116 # 29 DX-117 # 30 DX-118 # 31 DX-119 # 32 DX-120 # 33 DX-121 # 34 DX-122 # 35 DX-123 # 36 DX-124 # 37 DX-125 # 38 DX-126 # 39 DX-127 # 40 DX-128 # 41 DX-129 # 42 DX-130 # 43 DX-131) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	931 (44 pgs; 44 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-132 # 2 DX-133 # 3 DX-134 # 4 DX-135 # 5 DX-136 # 6 DX-137 # 7 DX-138 # 8 DX-139 # 9 DX-140 # 10 DX-141 # 11 DX-142 # 12 DX-143 # 13 DX-144 # 14 DX-145 # 15 DX-146 # 16 DX-147 # 17 DX-148 # 18 DX-149 # 19 DX-150 # 20 DX-151 # 21 DX-152 # 22 DX-153 # 23 DX-154 # 24 DX-155 # 25 DX-156 # 26 DX-157 # 27 DX-158 # 28 DX-159 # 29 DX-160 # 30 DX-161 # 31 DX-162 # 32 DX-163 # 33 DX-164 # 34 DX-165 # 35 DX-166 # 36 DX-167 # 37 DX-168 # 38 DX-169 # 39 DX-170 # 40 DX-171 # 41 DX-172 # 42 DX-173 # 43 DX-174) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	932 (44 pgs; 44 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-220 # 2 DX-221 # 3 DX-222 # 4 DX-223 # 5 DX-224 # 6 DX-225 # 7 DX-226 # 8 DX-227 # 9 DX-228 # 10 DX-229 # 11 DX-230 # 12 DX-231 # 13 DX-232 # 14 DX-233 # 15 DX-234 # 16 DX-235 # 17 DX-236 # 18 DX-237 # 19 DX-238 # 20 DX-239 # 21 DX-240 # 22 DX-241 # 23 DX-242 # 24 DX-243 # 25 DX-245 # 26 DX-246 # 27 DX-247 # 28 DX-248 # 29 DX-249 # 30 DX-250 # 31 DX-251 # 32 DX-252 # 33 DX-253 # 34 DX-254 # 35 DX-255 # 36 DX-256 # 37 DX-257 # 38 DX-258 # 39 DX-259 # 40 DX-260 # 41 DX-261 # 42 DX-262 # 43 DX-263) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	933 (39 pgs; 39 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-264 # 2 DX-265 # 3 DX-266 # 4 DX-267 # 5 268 # 6 DX-269 # 7 DX-270 # 8 DX-271 # 9 DX-272 # 10 DX-273 # 11 DX-274 # 12 DX-275 # 13 DX-276 # 14 DX-277 # 15 DX-278 # 16 DX-279 # 17 DX-280 # 18 DX-281 # 19 DX-282 # 20 DX-283 # 21 DX-284 # 22 DX-285 # 23 DX-286 # 24 DX-287 # 25 DX-288 # 26 DX-289 # 27 DX-290 # 28 DX-291 # 29 DX-292 # 30 DX-293 # 31 DX-294 # 32 DX-295 # 33 DX-296 # 34 DX-297 # 35 DX-298 # 36 DX-299 # 37 DX-300 # 38 DX-301) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	934 (46 pgs; 46 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-303 # 2 DX-304 # 3 DX-305 # 4 DX-306 # 5 DX-307 # 6 DX-308 # 7 DX-309 # 8 DX-310 # 9 DX-311 # 10 DX-312 # 11 DX-313 # 12 DX-314 # 13 DX-315 # 14 DX-316 # 15 DX-317 # 16 DX-318 # 17 DX-319 # 18 DX-320 # 19 DX-321 # 20 DX-322 # 21 DX-323 # 22 DX-324 # 23 DX-325 # 24 DX-326 # 25 DX-327 # 26 DX-328 # 27 DX-329 # 28 DX-330 # 29 DX-331 # 30 DX-332 # 31 DX-333 # 32 DX-334 # 33 DX-335 # 34 DX-336 # 35 DX-337 # 36 DX-339 # 37 DX-340 # 38 DX-341 # 39 DX-342 # 40 DX-343 # 41 DX-344 # 42 DX-345 # 43 DX-346 # 44 DX-347 # 45 DX-349) (Davidson, Timothy) (Entered: 12/05/2025)

12/05/2025	935 (14 pgs; 14 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JK-001 # 2 JX-002 # 3 JX-003 # 4 JX-004 # 5 JX-005 # 6 JX-006 # 7 JX-007 # 8 JX-008 # 9 JX-009 # 10 JX-010 # 11 JX-011 # 12 JX-012 # 13 JX-013) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	936 (14 pgs; 14 docs)	Sealed Document , Witness List (Filed By ModivCare Inc.). (Attachments: # 1 JX-014 # 2 JX-015 # 3 JX-016 # 4 JX-017 # 5 JX-018 # 6 JX-019 # 7 JX-020 # 8 JX-021 # 9 JX-022 # 10 JX-023 # 11 JX-024 # 12 JX-025 # 13 JX-026) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	937 (13 pgs; 13 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-027 # 2 JX-028 # 3 JX-029 # 4 JX-030 # 5 JX-031 # 6 JX-032 # 7 JX-033 # 8 JX-034 # 9 JX-035 # 10 JX-036 # 11 JX-037 # 12 JX-038) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	938 (13 pgs; 13 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-040 # 2 JX-041 # 3 JX-042 # 4 JX-043 # 5 JX-044 # 6 JX-045 # 7 JX-046 # 8 JX-047 # 9 JX-048 # 10 JX-049 # 11 JX-050 # 12 JX-051) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	939 (11 pgs; 11 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-052 # 2 JX-053 # 3 JX-055 # 4 JX-057 # 5 JX-058 # 6 JX-059 # 7 JX-060 # 8 JX-061 # 9 JX-062 # 10 JX-063) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	940 (13 pgs; 13 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-064 # 2 JX-065 # 3 JX-066 # 4 JX-067 # 5 JX-068 # 6 JX-069 # 7 JX-070 # 8 JX-071 # 9 JX-072 # 10 JX-073 # 11 JX-074 # 12 JX-075) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	941 (17 pgs; 17 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-076 # 2 JX-077 # 3 JX-078 # 4 JX-079A # 5 JX-079B # 6 JX-079C # 7 JX-079D # 8 JX-079E # 9 JX-079F # 10 JX-080 # 11 JX-081 # 12 JX-082 # 13 JX-083 # 14 JX-084 # 15 JX-085 # 16 JX-087) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	942 (14 pgs; 14 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-088 # 2 JX-089 # 3 JX-090 # 4 JX-091 # 5 JX-092 # 6 JX-093 # 7 JX-094 # 8 JX-095 # 9 JX-096 # 10 JX-097 # 11 JX-098 # 12 JX-099 # 13 JX-100) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	943 (202 pgs; 2 docs)	Omnibus Brief (Filed By ModivCare Inc.).(Related document(s):921 Sealed Document, Brief) (Attachments: # 1 Exhibit A) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	944 (1 pg)	Sealed Document *Statement of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Affiliates and Joinder in Debtors' Reply Brief* (Filed By First Lien Agent and Consenting Creditors). (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	945 (1 pg)	Sealed Document *Omnibus Response of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I)*

		Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority (Filed By First Lien Agent and Consenting Creditors). (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	946 (22 pgs; 22 docs)	Sealed Document *Declaration of Matthew L. Warren in Support of: (I) Omnibus Response of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors Estates and (B) Exclusive Settlement Authority ; and (ii) Statement of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and Joinder in Debtors Reply Brief* (Filed By First Lien Agent and Consenting Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N # 15 Exhibit O # 16 Exhibit P # 17 Exhibit Q # 18 Exhibit R # 19 Exhibit Y # 20 Exhibit AA # 21 Exhibit BB) (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	947 (1 pg)	MOTION to Appear Pro Hac Vice for Drew S. McGehrin (Fee Paid: $100, receipt number A26717997) Filed by Creditor The Chubb Companies (Billingsley, James) (Main Document 947 replaced on 12/8/2025) (AkeitaHouse). (Entered: 12/05/2025)
12/05/2025	948 (8 pgs)	Objection *Global Medical Response, Inc.s Objection to the Debtors Notice of Cure Amount*. Filed by Global Medical Response, Inc. (Muhammad, Arsalan) (Entered: 12/05/2025)
12/05/2025	949 (54 pgs; 54 docs)	Sealed Document *Appendix of Exhibits Cited in Debtors Omnibus Brief (A) In Support of Plan Confirmation and (B) Objecting to Committees Motions for Standing to Pursue Claims and Lien Challenges* (Filed By ModivCare Inc.). (Attachments: # 1 001 # 2 002 # 3 003 # 4 004 # 5 005 # 6 006 # 7 007 # 8 008 # 9 009 # 10 010 # 11 011 # 12 012 # 13 013 # 14 014 # 15 015 # 16 016 # 17 017 # 18 018 # 19 019 # 20 020 # 21 021 # 22 022 # 23 023 # 24 024 # 25 025 # 26 026 # 27 027 # 28 028 # 29 029 # 30 030 # 31 031 # 32 032 # 33 033 # 34 034 # 35 035 # 36 036 # 37 037 # 38 038 # 39 039 # 40 040 # 41 041 # 42 042 # 43 043 # 44 044 # 45 045 # 46 046 # 47 047 # 48 048 # 49 049 # 50 050 # 51 051 # 52 052 # 53 053) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	950 (2598 pgs; 26 docs)	Additional Attachments Re: *Appendix of Exhibits Cited in Debtors Omnibus Brief (A) In Support of Plan Confirmation and (B) Objecting to Committees Motions for Standing to Pursue Claims and Lien Challenges* (related document(s):943 Brief) (Filed By ModivCare Inc.).(Related document(s):943 Brief) (Attachments: # 1 001 # 2 002 # 3 003 # 4 004 # 5 006 # 6 007 # 7 008 # 8 009 # 9 010 # 10 011 # 11 012

		# 12 013 # 13 014 # 14 015 # 15 016 # 16 020 # 17 021 # 18 026 # 19 027 # 20 031 # 21 032 # 22 033 # 23 034 # 24 039 # 25 045) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	951 (26 pgs; 26 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 41 # 2 Exhibit 42 # 3 Exhibit 43 # 4 Exhibit 44 # 5 Exhibit 45 # 6 Exhibit 46 # 7 Exhibit 52 # 8 Exhibit 53 # 9 Exhibit 54 # 10 Exhibit 55 # 11 Exhibit 56 # 12 Exhibit 57 # 13 Exhibit 58 # 14 Exhibit 59 # 15 Exhibit 60 # 16 Exhibit 61 # 17 Exhibit 62 # 18 Exhibit 63 # 19 Exhibit 64 # 20 Exhibit 65 # 21 Exhibit 66 # 22 Exhibit 67 # 23 Exhibit 68 # 24 Exhibit 69 # 25 Exhibit 70) (Koster, Charles) (Entered: 12/05/2025)
12/05/2025	952 (42 pgs)	Declaration re: *Declaration of Zul Jamal in Support of Confirmation of the Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 921 Sealed Document, Brief) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	953 (26 pgs)	Declaration re: *Declaration of Chad J. Shandler in Support of Confirmation of the Debtors' Proposed Plan of Reorganization* (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 921 Sealed Document, Brief) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	954 (4 pgs)	Objection *Molina Healthcare, Inc.'s Limited Objection to Debtors' Notice of Potential Assumption of Certain of Debtors' Executory Contracts*. Filed by Molina Healthcare, Inc. (Jun, Catherine) (Entered: 12/05/2025)
12/05/2025	955 (1 pg)	Notice *of Withdrawal*. (Related document(s):747 Document) Filed by The Ronald McDonald House Entities (bmn4) (Entered: 12/05/2025)
12/05/2025	956 (5 pgs)	Notice *of Filing of Corrected Exhibit A to Declaration of Zul Jamal in Support of the Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):952 Declaration) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	957 (91 pgs)	Statement / *White & Case LLP's Third Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 to and including November 30, 2025* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 12/05/2025)
12/05/2025	958 (1927 pgs; 44 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-004 # 2 DX-005 # 3 DX-006 # 4 DX-007 # 5 DX-008 # 6 DX-009 # 7 DX-010 # 8 DX-012 # 9 DX-013 # 10 DX-014 # 11 DX-015 # 12 DX-019 # 13 DX-051 # 14 DX-052 # 15 DX-053 # 16 DX-054 # 17 DX-055 # 18 DX-056 # 19 DX-057 # 20 DX-059 # 21 DX-068 # 22 DX-070 # 23 DX-071 # 24 DX-238 # 25 DX-246 # 26 DX-247 # 27 DX-257 # 28 DX-258 # 29 DX-259 # 30 DX-263 # 31 DX-266 # 32 DX-270 # 33 DX-281 # 34 DX-282 # 35 DX-283 # 36 DX-284 # 37 DX-308 # 38 DX-310 # 39 DX-337 # 40 DX-339 # 41 DX-345 # 42 DX-346 # 43 DX-347) (Davidson, Timothy) (Entered: 12/05/2025)

12/05/2025	959 (70 pgs)	Second Amended Chapter 11 Plan Filed by ModivCare Inc.. (Related document(s):119 Chapter 11 Plan) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	960 (96 pgs)	Notice *of Filing of Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):959 Amended Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	961 (263 pgs)	Notice *of Filing of Third Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	962 (104 pgs)	Proposed Order RE: *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (Filed By ModivCare Inc.).(Related document(s):959 Amended Chapter 11 Plan) (Davidson, Timothy) (Entered: 12/05/2025)
12/06/2025	963 (8 pgs; 2 docs)	Motion to Seal / *The Official Committee of Unsecured Creditors' Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 12/06/2025)
12/06/2025	964 (1 pg)	Sealed Document / *Second Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of the Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors). (Pesce, Gregory) (Entered: 12/06/2025)
12/06/2025	965 (9 pgs)	Declaration re: / *Second Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of the Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):593 Declaration, 616 Order on Application to Employ, 964 Sealed Document) (Pesce, Gregory) (Entered: 12/06/2025)
12/06/2025	966 (19 pgs)	Certificate *of Service re: Documents Served on December 2, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):877 Witness List, Exhibit List, 879 Generic Motion, 880 Notice, 886 Statement, 888 Motion to Seal) (Gershbein, Evan) (Entered: 12/06/2025)
12/06/2025	967 (16 pgs)	BNC Certificate of Mailing. (Related document(s):898 Transcript) No. of Notices: 104. Notice Date 12/06/2025. (Admin.) (Entered: 12/06/2025)

12/07/2025	968 (14 pgs)	Agenda for Hearing on 12/8/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/07/2025)
12/07/2025	969 (3 pgs)	Notice of Appearance and Request for Notice Filed by Sean B Davis Filed by on behalf of Waystar, Inc. (Davis, Sean) (Entered: 12/07/2025)
12/07/2025	970 (7 pgs; 2 docs)	Response (Filed By Waystar, Inc.).(Related document(s):605 Notice) (Attachments: # 1 Proposed Order) (Davis, Sean) (Entered: 12/07/2025)
12/07/2025	971 (14 pgs)	Certificate *of Service re: Documents Served on or Before December 6, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):916 Declaration, 943 Brief, 952 Declaration, 953 Declaration, 956 Notice, 958 Exhibit List, 959 Amended Chapter 11 Plan, 960 Notice, 961 Notice, 962 Proposed Order) (Gershbein, Evan) (Entered: 12/07/2025)
12/07/2025	972 (9 pgs)	Certificate *of Service re: Debtors Agenda of Matters Set for Hearing on December 8, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):968 Agenda) (Gershbein, Evan) (Entered: 12/07/2025)
12/07/2025	973 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the December 3, 2025 Status Conference before Judge Alfredo R. Perez. Court Reporter/Transcriber: Access Transcripts (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Access Transcripts on 12/08/2025. Estimated completion date: 12/09/2025. Modified on 12/8/2025 (smg4). (Entered: 12/07/2025)
12/07/2025	974 (32 pgs)	Reply */ The Official Committee of Unsecured Creditors' Reply in Further Support of Its Motion for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* (related document(s):732 Generic Motion). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/07/2025)
12/07/2025	975 (17 pgs)	Reply */ Official Committee of Unsecured Creditors' Reply in Support of Omnibus Motion (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (related document(s):733 Generic Motion). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/07/2025)
12/08/2025	976 (3 pgs; 3 docs)	Sealed Document */ Debtors' Second Amended Exhibit List for the Confirmation Hearing*, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-350 # 2 DX-351) (Davidson, Timothy) (Entered: 12/08/2025)
12/08/2025	977 (41 pgs; 2 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-350) (Davidson, Timothy) (Entered: 12/08/2025)

12/08/2025	978 (51 pgs; 3 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 228 # 2 Exhibit 229) (Koster, Charles) (Entered: 12/08/2025)
12/05/2025	979 (4 pgs)	Invoice for Claim re: 670 Objection to Claim Number by Claimant / Debtors' Omnibus Objection to Certain Proofs of Claim by Cherese Jackson (anc4) (Entered: 12/08/2025)
12/08/2025	980 (2 pgs; 2 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' First Amended Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 229) (Koster, Charles) (Entered: 12/08/2025)
12/08/2025	981 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the December 8-10, 2025 Confirmation Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded hearing request for 12/8/2025 on 12/9/2025. Estimated completion date: 12/10/2025. Modified on 12/9/2025 (smg4). (Entered: 12/08/2025)
12/08/2025	982 (1 pg)	Order Granting Motion for Drew McGehrin To Appear pro hac vice (Related Doc # 947) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/8/2025. (abh4) (Entered: 12/08/2025)
12/08/2025	983 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 am to 10:45 am; 11:00 am to 12:00 pm; 1:00 pm to 2:25 pm; 2:34 pm to 3:44 pm; 3:59 pm to 5:08 pm. Appearances: see log. Additional appearances: Ray Schrock, Jamie Wine, Keith Simon, Tad Davidson, Elizabeth "Betsy" Marks, Craig Stanfield, George Kildonas, Alea Kennedy, Cherese Jackson, Deborah "Debbie" Newman, Chad Shandler, Heath Sampson, and Faisal Khan. Sworn and testified witnesses: Leslie Norwalk, Kenneth Shepard, and Daniel "Dan" Silvers. Admitted exhibits: ECF Nos. 936-5 (JX-18), 938-3 (JX-24), and 927-21 (DX-21). Confirmation and Motion hearing held. Oral argument heard. This matter is continued to 12/9/25 at 8:30 am. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) **Hearing scheduled for 12/9/2025 at 08:30 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 12/08/2025)
12/08/2025	984 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 9:00:34 AM]. File Size [49972 KB]. Run Time [01:44:07]. (admin). (Entered: 12/08/2025)
12/08/2025	985 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 11:00:11 AM]. File Size [28414 KB]. Run Time [00:59:12]. (admin). (Entered: 12/08/2025)
12/08/2025	986 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 1:00:02 PM]. File Size [40240 KB]. Run Time [01:23:50]. (admin). (Entered: 12/08/2025)

12/08/2025	987 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 2:34:09 PM]. File Size [32752 KB]. Run Time [01:08:14]. (admin). (Entered: 12/08/2025)
12/08/2025	988 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 3:59:09 PM]. File Size [33048 KB]. Run Time [01:08:51]. (admin). (Entered: 12/08/2025)
12/08/2025	989 (3573 pgs; 5 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-352 # 2 DX-353 # 3 DX-354 # 4 DX-355) (Davidson, Timothy) (Entered: 12/08/2025)
12/09/2025	990 (38 pgs)	Exhibit List (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	991 (10 pgs)	Notice *of Filing of Unopposed DX List in Connection With Hearing to Consider Confirmation of Debtors' Plan*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	992 (9 pgs)	Certificate *of Service re: 1) Debtors Third Amended Exhibit List for the Confirmation Hearing; 2) Debtors Fourth Amended Exhibit List for the Confirmation Hearing; and 3) Notice of Filing of Unopposed DX List in Connection with Hearing to Consider Confirmation of Debtors Plan* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):989 Exhibit List, 990 Exhibit List, 991 Notice) (Gershbein, Evan) (Entered: 12/09/2025)
12/09/2025	993 (5 pgs)	Declaration re: */ Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 916 Declaration, 959 Amended Chapter 11 Plan) (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	994 (43 pgs; 2 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-356) (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	995 (19 pgs; 2 docs)	Notice *of Filing of Unopposed CX List in Connection with the Confirmation Hearing*. Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A - Unopposed CX List) (Koster, Charles) (Entered: 12/09/2025)
12/09/2025	996 (24 pgs; 2 docs)	Transcript RE: Status Conference held on 12/03/25 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/9/2026. (AccessTranscripts) (Entered: 12/09/2025)
12/09/2025	997 (2 pgs)	Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief (Related Doc # 722), Signed on 12/9/2025. (abh4) (Entered: 12/09/2025)

12/09/2025	998 (1 pg)	Letter from John Behnken, Jr (bmn4) (Entered: 12/09/2025)
12/09/2025	999 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 am to 10:20 am; 10:31 am to 11:51 am; 1:00 pm to 3:00 pm; 3:15 pm to 3:57 pm; 4:11 pm to 4:36 pm. Appearances: see log. Additional appearances: Elizabeth "Betsy" Marks, Jamie Wine, George Klidonas, Keith Simon, Tad Davidson, and Kamali Houston. Sworn and testified witnesses: James Lee, Chad Shandler, and Zul Jamal. Admitted exhibits: ECF No.: 990-1 through 990-85; 990-87 and 990-88 not for the truth of the matter; 991 (Exhibit A: except for the caveats previously discussed between the parties); 933-14 (DX-277); 993 (DX-356) subject to cross examination; 995 (CX-1 through CX-229 with the exception of the caveats previously discussed between the parties). Confirmation and Motion hearing held. Oral argument heard. Debtor is to file a supplemental declaration that reflects to the extent a claim was paid prior to the record voting date, and they voted to remove the claim. This matter is continued until 12/10/25 at 9:00 am. Closing arguments will be tentatively scheduled on 12/11/2025 at 2:00 pm. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) Hearing scheduled for 12/10/2025 at 09:00 AM at Houston, Courtroom 400 (ARP). (abh4) (Entered: 12/09/2025)
12/09/2025	1000 (17 pgs; 6 docs)	First Application for Compensation / *White & Case LLP's First Interim Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including November 30, 2025* for White & Case LLP, Attorney, Period: 9/9/2025 to 11/30/2025, Fee: $10,778,971, Expenses: $146,980.24. Objections/Request for Hearing Due in 21 days. Filed by Attorney White & Case LLP (Attachments: # 1 Proposed Order # 2 Exhibit A # 3 Exhibit B # 4 Exhibit C # 5 Exhibit D) (Koster, Charles) (Entered: 12/09/2025)
12/09/2025	1001 (3 pgs)	Notice of Appearance and Request for Notice Filed by Simon Richard Mayer Filed by on behalf of National Specialty Insurance Company (Mayer, Simon) (Entered: 12/09/2025)
12/09/2025	1002 (21 pgs; 4 docs)	*Withdrawn* Application for Administrative Expenses *under 11 U.S.C. 503(b)(1)*. Objections/Request for Hearing Due in 21 days. Filed by Creditor National Specialty Insurance Company (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order) (Mayer, Simon)Modified on 1/16/2026 (tjl4). (Entered: 12/09/2025)
12/09/2025	1003 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 8:30:02 AM]. File Size [52608 KB]. Run Time [01:49:36]. (admin). (Entered: 12/09/2025)
12/09/2025	1004 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 10:31:20 AM]. File Size [37695 KB]. Run Time [01:18:32]. (admin). (Entered: 12/09/2025)
12/09/2025	1005 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 1:00:00 PM]. File Size [57735 KB]. Run Time [02:00:17]. (admin). (Entered: 12/09/2025)

12/09/2025	1006 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 3:15:01 PM]. File Size [20077 KB]. Run Time [00:41:50]. (admin). (Entered: 12/09/2025)
12/09/2025	1007 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 4:11:44 PM]. File Size [11621 KB]. Run Time [00:24:13]. (admin). (Entered: 12/09/2025)
12/09/2025	1008 (3738 pgs; 14 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-357 # 2 DX-358 # 3 DX-359 # 4 DX-360 (Part 1 of 7) # 5 DX-360 (Part 2 of 7) # 6 DX-360 (Part 3 of 7) # 7 DX-360 (Part 4 of 7) # 8 DX-360 (Part 5 of 7) # 9 DX-360 (Part 6 of 7) # 10 DX-360 (Part 7 of 7) # 11 DX-361 # 12 DX-363 # 13 DX-364) (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	1009 (2 pgs; 2 docs)	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-362) (Davidson, Timothy) (Entered: 12/09/2025)
12/10/2025	1010 (6 pgs)	Notice *of Filing of DX List in Connection with Hearing to Consider Confirmation of Debtors' Plan*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/10/2025)
12/10/2025	1011 (22 pgs)	Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors' Insurance Programs, Signed on 12/10/2025 (Related document(s):868 Stipulation) (abh4) (Entered: 12/10/2025)
12/10/2025	1012 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 am to 10:43 am; 11:00 am to 12:21 pm; 1:30 pm to 2:57 pm; 3:05 pm to 3:13 pm. Appearances: see log. Sworn and testified witnesses: Greg Magrisi and Marc Brown. Admitted exhibits: ECF No.: 990 (JX-89 through JX-100). Confirmation and Motion hearing held. Oral argument heard. This matter is continued until 12/11/25 at 2:00 pm. ERO: yes. (Related document(s):445 Plan, 728 Motion, 729 Motion) (abh4) ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) (abh4)Modified on 12/11/2025 (abh4). (Entered: 12/10/2025)
12/10/2025	1013 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 9:00:44 AM]. File Size [48329 KB]. Run Time [01:40:41]. (admin). (Entered: 12/10/2025)
12/10/2025	1014 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 11:00:06 AM]. File Size [38387 KB]. Run Time [01:19:58]. (admin). (Entered: 12/10/2025)
12/10/2025	1015 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 1:30:17 PM]. File Size [41323 KB]. Run Time [01:26:05]. (admin). (Entered: 12/10/2025)
12/10/2025	1016 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 3:05:49 PM]. File Size [3310 KB]. Run Time [00:06:54]. (admin).

		(Entered: 12/10/2025)
12/10/2025	1017 (2 pgs; 2 docs)	Sealed Motion / *Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Term Sheet and Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/10/2025)
12/10/2025	1018 (5 pgs)	Declaration re: *Second Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc.* (Filed By ModivCare Inc.).(Related document(s):916 Declaration, 993 Declaration) (Davidson, Timothy) (Entered: 12/10/2025)
12/10/2025	1019 (43 pgs)	Notice / *The Official Committee of Unsecured Creditors' Deposition Designations of David Mounts Gonzales, Heath Sampson, Barbara Gutierrez, and Scott A. Kern*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1020 (6 pgs; 6 docs)	Sealed Document / *The Official Committee of Unsecured Creditors' Deposition Designations of David Mounts Gonzales, Heath Sampson, Barbara Gutierrez, and Scott A. Kern [Exhibits B-F]* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit B - Gonzales Deposition Transcript Vol. I # 2 Exhibit C - Gonzales Deposition Transcript Vol. II # 3 Exhibit D - Sampson Deposition Transcript # 4 Exhibit E - Gutierrez Deposition Transcript # 5 Exhibit F - Kern Deposition Transcript) (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1021 (283 pgs; 2 docs)	Transcript RE: Motion Hearing and Confirmation Day One held on December 8, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/10/2026. (mhen) (Entered: 12/10/2025)
12/10/2025	1022 (43 pgs)	Notice *of Filing of Demonstratives to the Confirmation Hearing*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1023 (56 pgs)	Notice / *The Official Committee of Unsecured Creditors' Deposition Designations of Daniel B. Silvers*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1024 (15 pgs)	Certificate *of Service re: 1) Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; 2) Debtors Fourth Amended Exhibit List for the Confirmation Hearing; and 3) Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):993 Declaration, 994 Exhibit List, 997 Order on Motion to Extend Time) (Gershbein, Evan) (Entered: 12/10/2025)

12/10/2025	1025 (19 pgs)	Certificate *of Service re: 1) Debtors Fifth Amended Exhibit List for the Confirmation Hearing; 2) Notice of Filing of DX List in Connection with Hearing to Consider Confirmation of Debtors Plan; 3) Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors Insurance Programs; and 4) Second Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1008 Exhibit List, 1010 Notice, 1011 Generic Order, 1018 Declaration) (Gershbein, Evan) (Entered: 12/10/2025)
12/10/2025	1026 (43 pgs)	Amended Notice *of Filing Demonstratives to the Confirmation Hearing*. (Related document(s):1022 Notice) Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/11/2025	1027 (12 pgs; 2 docs)	Emergency Motion */ Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Term Sheet and Granting Related Relief* Filed by Debtor ModivCare Inc. Hearing scheduled for 12/11/2025 at 02:00 PM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1028 (9 pgs; 2 docs)	Motion to Seal */ Motion of Debtors to File Exit Financing Term Sheet and Confidential Information Related Thereto Contained in the Motion to Enter Into and Perform Under the Exit Financing Term Sheet Under Seal* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1029 (7 pgs)	Response (Filed By The Chubb Companies).(Related document(s):790 Objection) (Billingsley, James) (Entered: 12/11/2025)
12/11/2025	1030 (29 pgs)	Notice *of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan, 961 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1031 (1 pg)	PDF with attached Audio File. Court Date & Time [12/11/2025 11:35:04 AM]. File Size [569 KB]. Run Time [00:01:11]. (admin). (Entered: 12/11/2025)
12/11/2025	1032 (1 pg)	Sealed Document */ Notice of Filing of Debtors' Demonstrative from Confirmation Hearing* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1033 (1 pg)	Order Deeming Proof of Claim (ECF No. 563-1) Filed by Peggy Aaron as Timely Filed (Related Doc # 563), Signed on 12/11/2025. (abh4) (Entered: 12/11/2025)
12/11/2025	1034 (73 pgs; 3 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-365 # 2 DX-366) (Davidson, Timothy) (Entered: 12/11/2025)

12/11/2025	1035 (148 pgs; 2 docs)	Proposed Order RE: *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (Filed By ModivCare Inc.).(Related document(s):959 Amended Chapter 11 Plan, 962 Proposed Order) (Attachments: # 1 Redline) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1036	Courtroom Minutes. Time Hearing Held: 11:35 am to 11:37 am. Appearances: Brandon Bell. No additional appearances. Motion hearing held. Debtor is unopposed to motion 563. The Court rules the proof of claim is deemed timely filed. ERO: yes. (Related document(s):563 Motion to Extend Time) (abh4) (Entered: 12/11/2025)
12/11/2025	1037 (289 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Two held on December 9, 2025 before Judge Christopher M. Lopez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/11/2026. (mhen) (Entered: 12/11/2025)
12/11/2025	1038 (289 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Two held on December 9, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/11/2026. (mhen) (Entered: 12/11/2025)
12/11/2025	1039 (1 pg)	Courtroom Minutes. Time Hearing Held: 2:02 pm to 2:57 pm; 3:08pm to 6:03 pm. Appearances: see log. Additional appearances: George Klidonas, Ray Schrock, Jamie Wine, Keith Simon, Elizabeth "Betsy" Marks, Christopher "Chris" Shore, and Jonathan John Weichselbaum. Admitted exhibits: ECF No.: 1034-1 and 1034-2.Confirmation and Motion hearing held. Closing argument heard. Motion 1027 is approved on the record, debtor is to upload an order. The confirmation hearing is continue 12/12/2025 at 11:00 am. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document, 1027 Emergency Motion (with hearing date)) **Hearing scheduled for 12/12/2025 at 11:00 AM at telephone and video conference.** (abh4)Modified on 12/11/2025 (abh4). (Entered: 12/11/2025)
12/11/2025	1040 (2 pgs)	Order Granting Motion of Debtors to File Exit Financing Term Sheet and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Term Sheet Under Seal, Signed on 12/11/2025 (Related document(s):1027 Emergency Motion (with hearing date), 1028 Motion to Seal) (abh4) (Entered: 12/11/2025)
12/11/2025	1041 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the December 11, 2025 Confirmation Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official

		Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 12/12/2025. Estimated completion date: 12/13/2025. Modified on 12/12/2025 (amp4). (Entered: 12/11/2025)
12/11/2025	1042 (1 pg)	PDF with attached Audio File. Court Date & Time [12/11/2025 2:02:38 PM]. File Size [25681 KB]. Run Time [00:53:30]. (admin). (Entered: 12/11/2025)
12/11/2025	1043 (1 pg)	PDF with attached Audio File. Court Date & Time [12/11/2025 3:08:06 PM]. File Size [83024 KB]. Run Time [02:52:58]. (admin). (Entered: 12/11/2025)
12/11/2025	1044 (1 pg)	Sealed Document / *Notice of Filing of Debtors' Opening Statement and Closing Statement Demonstratives from Confirmation Hearing* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/11/2025)
12/12/2025	1045 (57 pgs; 2 docs)	Notice *of Filing of the Official Committee of Unsecured Creditors' Closing Statement Demonstrative From the Confirmation Hearing*. Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A) (Koster, Charles) (Entered: 12/12/2025)
12/12/2025	1046 (2 pgs)	Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code (Related Doc # 16, 59, 388, 412, 579,745), Signed on 12/12/2025. (abh4) (Entered: 12/12/2025)
12/12/2025	1047 (1 pg)	Courtroom Minutes. Time Hearing Held: 11:00 am to 11:27 am. Appearances: see log. Additional appearances: George Klidonas, Jamie Wine, and Ray Schrock. Confirmation and Emergency Motion hearing held. The Court confirms the plan for the reasons states on the record. Parties are to confer on an agreed order. If an agreement can not be reached, the parties may file their own orders and the court will decide. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) (abh4) (Entered: 12/12/2025)
12/12/2025	1048 (1 pg)	PDF with attached Audio File. Court Date & Time [12/12/2025 11:02:34 AM]. File Size [11384 KB]. Run Time [00:23:43]. (admin). (Entered: 12/12/2025)
12/12/2025	1049 (3 pgs)	Order Authorizing the Debtors to Enter into and Perform Under the Exit Financing Term Sheet and Granting Related Relief, Signed on 12/12/2025 (Related document(s):1017 Sealed Motion, 1027 Emergency Motion (with hearing date)) (abh4) (Entered: 12/12/2025)
12/13/2025	1050 (206 pgs; 2 docs)	Transcript RE: Confirmation and Motion Hearing Day Three held on December 10, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/13/2026. (mhen) (Entered: 12/13/2025)
12/13/2025	1051 (17 pgs)	BNC Certificate of Mailing. (Related document(s):996 Transcript) No. of Notices: 106. Notice Date 12/13/2025. (Admin.) (Entered: 12/14/2025)

12/13/2025	1052 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1021 Transcript) No. of Notices: 106. Notice Date 12/13/2025. (Admin.) (Entered: 12/14/2025)
12/14/2025	1053 (152 pgs; 3 docs)	Proposed Order Submission After Hearing (Filed By ModivCare Inc.). (Related document(s):959 Amended Chapter 11 Plan, 962 Proposed Order, 1035 Proposed Order) (Attachments: # 1 Full Redline # 2 Changed-Page Only Redline) (Davidson, Timothy) (Entered: 12/14/2025)
12/15/2025	1054 (1 pg)	Order Conditionally Granting the Motions to Extend the Deadline to File an Objection to the Assumption Notices, Signed on 12/15/2025 (Related document(s):752 Motion to Extend Time, 754 Generic Motion, 755 Generic Motion, 756 Generic Motion, 759 Generic Motion, 760 Generic Motion, 761 Motion to Extend Time, 762 Generic Motion, 764 Motion to Extend Time, 765 Generic Motion, 767 Generic Motion, 768 Generic Motion, 769 Motion to Extend Time, 771 Motion to Extend Time, 772 Generic Motion, 774 Motion to Extend Time, 775 Generic Motion, 776 Generic Motion) (abh4) (Entered: 12/15/2025)
12/15/2025	1055 (107 pgs)	Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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, Signed on 12/15/2025 (Related document(s):959 Amended Chapter 11 Plan, 1053 Proposed Order Submission After Hearing (Greensheet)) (abh4) (Entered: 12/15/2025)
12/15/2025	1056 (2 pgs)	Notice *of Annual Rate Increase by Hunton Andrews Kurth LLP*. (Related document(s):503 Order on Application to Employ) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/15/2025)
12/15/2025	1057 (167 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Four held on December 11, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/16/2026. (mhen) (Entered: 12/15/2025)
12/15/2025	1058 (2 pgs)	Notice of Appearance and Request for Notice Filed by Shawn Michael Grady Filed by on behalf of Florence Speaker (Grady, Shawn) (Entered: 12/15/2025)
12/16/2025	1059 (4 pgs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):657 Motion for Relief From Stay) (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1060 (3 pgs)	Withdraw Document (Filed By Hexaware Technologies Limited). (Related document(s):741 Objection) (Billingsley, James) (Entered: 12/16/2025)
12/16/2025	1061 (1 pg)	Sealed Document / *Supplemental Declaration of Matt Lazzeri in Support of Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax*

		Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1062 (18 pgs)	Declaration re: */ Supplemental Declaration of Matt Lazzeri in Support of Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1063 (7 pgs)	Stipulation By ModivCare Inc. and Mary Beth Duran. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1064 (5 pgs)	Stipulation By ModivCare Inc. and Thresa Lyons, individually and as personal representative of the estate of Rosa Lyons. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1065 (10 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 25, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 605 Notice, 748 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1066 (4 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1067 (10 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before December 3, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 605 Notice, 712 Notice, 716 Order on Application to Employ, 748 Certificate, 813 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1068 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1069 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before December 9, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):605 Notice, 685 Order on Motion to Extend Time, 699 Certificate, 734 Order on Application

		to Employ, 748 Certificate, 788 Certificate, 863 Generic Order, 889 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1070 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/17/2025	1071 (7 pgs)	Stipulation and Agreed Order Granting Limited Relief from Plan Injunction, Signed on 12/17/2025 (Related document(s):1063 Stipulation) (abh4) (Entered: 12/17/2025)
12/17/2025	1072 (5 pgs)	Agreed Order and Stipulation Resolving Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors, Signed on 12/17/2025 (Related document(s):471 Motion and 1064 Stipulation) (abh4) (Entered: 12/17/2025)
12/17/2025	1073 (9 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Extending the Exclusive Periods to File and Solicit a Plan* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/17/2025)
12/17/2025	1074 (1 pg)	MOTION to Appear Pro Hac Vice for Brad Lenox (Fee Paid: $100, receipt number A26758435) Filed by Creditor The Chubb Companies (Lenox, Bradley) (Entered: 12/17/2025)
12/17/2025	1075 (18 pgs)	Certificate *of Service re: Documents Served on or Before December 12, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1030 Notice, 1034 Exhibit List, 1035 Proposed Order, 1040 Generic Order) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1076 (8 pgs)	Certificate *of Service re: 1) Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code; and 2) Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Term Sheet and Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1046 Generic Order, 1049 Generic Order) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1077 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on December 12, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):128 Certificate, 352 Certificate, 394 Generic Order, 443 Certificate, 507 Order on Motion to Reject Lease or Executory Contract, 564 Certificate, 685 Order on Motion to Extend Time, 699 Certificate) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1078 (11 pgs)	Certificate *of Service re: 1) Debtors Witness and Exhibit List; and 2) Supplemental Declaration of Matt Lazzeri in Support of Debtors Application for Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief*

		(Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1059 Witness List, Exhibit List, 1062 Declaration) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1079 (3 pgs)	Declaration re: / *Third Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors). (Related document(s):593 Declaration, 616 Order on Application to Employ, 965 Declaration) (Pesce, Gregory) (Entered: 12/17/2025)
12/17/2025	1080 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1037 Transcript) No. of Notices: 106. Notice Date 12/17/2025. (Admin.) (Entered: 12/17/2025)
12/17/2025	1081 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1038 Transcript) No. of Notices: 106. Notice Date 12/17/2025. (Admin.) (Entered: 12/17/2025)
12/17/2025	1082 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1050 Transcript) No. of Notices: 106. Notice Date 12/17/2025. (Admin.) (Entered: 12/17/2025)
12/18/2025	1083 (1 pg)	Order Granting Motion for Brad Lenox To Appear pro hac vice (Related Doc # 1074) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/18/2025. (abh4) (Entered: 12/18/2025)
12/18/2025	1084 (1 pg)	Courtroom Minutes. Time Hearing Held: 11:02 am to 11:10 am. Appearances: see log. Additional appearances: Lisa Sallaj. Motion hearing held. Oral argument heard. This matter is continued to 1/29/2026 at 11:00 am. The parties are encouraged to confer upon an agreed order. To the extent an agreement is reached, the debtor may upload an agreed order. The stay will remain in effect. ERO: yes. (Related document(s):657 Motion for Relief From Stay, 663 Generic Application) **Hearing scheduled for 1/29/2026 at 11:00 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 12/18/2025)
12/18/2025	1085 (1 pg)	PDF with attached Audio File. Court Date & Time [12/18/2025 11:02:31 AM]. File Size [3272 KB]. Run Time [00:06:49]. (admin). (Entered: 12/18/2025)
12/18/2025	1086 (68 pgs)	Statement / *Third Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2025 through November 30, 2025* (Filed By AlixPartners, LLP). (Koster, Charles) (Entered: 12/18/2025)
12/18/2025	1087 (24 pgs)	Certificate *of Service re: 1) Order Conditionally Granting the Motions to Extend the Deadline to File an Objection to the Assumption Notices; 2) Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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; and*

		3) Notice of Annual Rate Increase by Hunton Andrews Kurth LLP (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1054 Generic Order, 1055 Order Confirming Chapter 11 Plan, 1056 Notice) (Gershbein, Evan) (Entered: 12/18/2025)
12/18/2025	1088 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1057 Transcript) No. of Notices: 106. Notice Date 12/18/2025. (Admin.) (Entered: 12/18/2025)
12/19/2025	1089 (5 pgs)	Stipulation By ModivCare Inc. and Florence Speaker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/19/2025)
12/19/2025	1090 (3 pgs)	Notice *of Annual Rate Increase by Latham & Watkins LLP*. (Related document(s):502 Order on Application to Employ) Filed by Latham & Watkins LLP (Davidson, Timothy) (Entered: 12/19/2025)
12/22/2025	1091 (2 pgs)	Order Granting Debtors' Motion to File Under Seal Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors' Insurance Programs (Related Doc # 869), Signed on 12/22/2025. (abh4) (Entered: 12/22/2025)
12/22/2025	1092 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Florence Speaker, Signed on 12/22/2025 (Related document(s):1089 Stipulation) (abh4) (Entered: 12/22/2025)
12/22/2025	1093 (13 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Limited Relief from Plan Injunction; 2) Agreed Order and Stipulation Resolving Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors; and 3) Debtors Motion for Entry of an Order Extending the Exclusive Periods to File and Solicit a Plan* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1071 Generic Order, 1072 Generic Order, 1073 Generic Motion) (Gershbein, Evan) (Entered: 12/22/2025)
12/22/2025	1094 (658 pgs)	Notice *of Filing of Fifth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan, 961 Notice, 1030 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/22/2025)
12/23/2025	1095 (2 pgs)	Notice *of Status Conference to be Held on December 23, 2025, at 10:30 A.M.* Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/23/2025)
12/23/2025	1096 (6 pgs)	Certificate *of Service re Notice of Status Conference to be Held on December 23, 2025, at 10:30 a.m.* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1095 Notice) (Gershbein, Evan) (Entered: 12/23/2025)
12/23/2025	1097 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by ModivCare Inc.. This is to order a transcript of Status Conference 12.23.25 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Veritext Legal Solutions (Filed By ModivCare Inc.). (Davidson, Timothy) Electronically

		forwarded to Veritext Legal Solutions on 12/23/25. Estimated completion date: 12/26/25. Modified on 12/23/2025 (anc4). (Entered: 12/23/2025)
12/23/2025	1098 (1 pg)	Courtroom Minutes. Time Hearing Held: 10:33 am to 10:40 am. Appearances: see log. Additional appearances: Charles Koster. Status conference held. Oral update provided to the court.ERO: yes. (Related document(s):1055 Order Confirming Chapter 11 Plan) (abh4) (Entered: 12/23/2025)
12/23/2025	1099 (1 pg)	Withdrawal of Claim: *No. 1 for Bexar County* (Stecker, Don) (Entered: 12/23/2025)
12/23/2025	1100 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $29796095 disbursed (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1101 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $888485 disbursed (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1102 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $3826597 disbursed (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1103 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $157542432 disbursed (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1104 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $45358131 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1105 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1106 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1107 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1108 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1109 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 12/23/2025)

12/23/2025	1110 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1111 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1112 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1113 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1114 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1115 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1116 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1117 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1118 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1119 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1120 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1121 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1122 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1123 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 12/23/2025)

12/23/2025	1124 (1 pg)	PDF with attached Audio File. Court Date & Time [12/23/2025 10:32:57 AM]. File Size [3721 KB]. Run Time [00:07:45]. (admin). (Entered: 12/23/2025)
12/23/2025	1125 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Interested Party. This is to order a transcript of Bankruptcy Proceeding Held on December 12, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Interested Party). (Carlson, Clifford) Electronically forwarded to Judicial Transcribers of Texas on 12/24/2025. Estimated completion date: 12/25/2025. Modified on 12/24/2025 (sew4). (Entered: 12/23/2025)
12/23/2025	1126 (7 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 12/23/2025)
12/23/2025	1127 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before December 16, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 605 Notice, 748 Certificate) (Gershbein, Evan) (Entered: 12/23/2025)
12/23/2025	1128 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/23/2025)
12/26/2025	1129 (9 pgs; 2 docs)	Transcript RE: held on 12/23/25 before Judge ALFREDO R. PEREZ. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/26/2026. (VeritextLegalSolutions) (Entered: 12/26/2025)
12/26/2025	1130 (30 pgs)	Notice *of Filing of Sixth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan, 961 Notice, 1030 Notice, 1094 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/26/2025)
12/26/2025	1131 (11 pgs)	Certificate *of Service re: 1) Order Granting Debtors Motion to File Under Seal Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors Insurance Programs; and 2) Stipulation and Agreed Order Granting Relief from Stay to Florence Speaker* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1091 Order on Motion to Seal, 1092 Generic Order) (Gershbein, Evan) (Entered: 12/26/2025)

12/28/2025	1132 (3 pgs)	Declaration re: */ Second Supplemental Declaration of Zul Jamal In Connection With Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):504 Order on Application to Employ) (Davidson, Timothy) (Entered: 12/28/2025)
12/29/2025	1133 (14 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/29/2025)
12/29/2025	1134 (4 pgs)	Notice *of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines With Respect to Administrative Expense and Rejection Damage Claims*. (Related document(s):959 Amended Chapter 11 Plan, 1055 Order Confirming Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/29/2025)
12/29/2025	1135 (2 pgs)	Order Extending Time to Assume or to Reject Unexpired Leases of Nonresidential Real Property (Related Doc # 879), Signed on 12/29/2025. (abh4) (Entered: 12/29/2025)
12/29/2025	1136 (2 pgs)	Order Granting the Motion to Seal the Letter to the Court (Related Doc # 888), Signed on 12/29/2025. (abh4) (Entered: 12/29/2025)
12/29/2025	1137 (1 pg)	Withdrawal of Claim: *No. 2 filed by City of El Paso* (Stecker, Don) (Entered: 12/29/2025)
12/29/2025	1138 (18 pgs)	Certificate *of Service re: Documents Served on December 23, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1094 Notice, 1100 Debtor-in-Possession Monthly Operating Report, 1101 Debtor-in-Possession Monthly Operating Report, 1102 Debtor-in-Possession Monthly Operating Report, 1103 Debtor-in-Possession Monthly Operating Report, 1104 Debtor-in-Possession Monthly Operating Report, 1105 Debtor-in-Possession Monthly Operating Report, 1106 Debtor-in-Possession Monthly Operating Report, 1107 Debtor-in-Possession Monthly Operating Report, 1108 Debtor-in-Possession Monthly Operating Report, 1109 Debtor-in-Possession Monthly Operating Report, 1110 Debtor-in-Possession Monthly Operating Report, 1111 Debtor-in-Possession Monthly Operating Report, 1112 Debtor-in-Possession Monthly Operating Report, 1113 Debtor-in-Possession Monthly Operating Report, 1114 Debtor-in-Possession Monthly Operating Report, 1115 Debtor-in-Possession Monthly Operating Report, 1116 Debtor-in-Possession Monthly Operating Report, 1117 Debtor-in-Possession Monthly Operating Report, 1118 Debtor-in-Possession Monthly Operating Report, 1119 Debtor-in-Possession Monthly Operating Report, 1120 Debtor-in-Possession Monthly Operating Report, 1121 Debtor-in-Possession Monthly Operating Report, 1122 Debtor-in-Possession Monthly Operating Report, 1123 Debtor-in-Possession Monthly Operating Report) (Gershbein, Evan) (Entered: 12/29/2025)

12/30/2025	1139 (3 pgs)	Notice *of Withdrawal of Objection to Debtors' "Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases (Doc. 605)" (Related to Doc. No 736)*. Filed by Administrative Services Cooperative, Inc. (Conley, Phillip) (Entered: 12/30/2025)
12/30/2025	1140 (13 pgs)	Objection *to State Nationals Application for Payment of Administrative Claim* (related document(s):1002 Application for Administrative Expenses). Filed by First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 12/30/2025)
12/30/2025	1141 (5 pgs)	Objection *// Limited Objection and Reservation of Rights of NEMT Insurance DE LLC, Series 1 to Application of National Specialty Insurance Company for Payment of Administrative Expense Claim Under 11 U.S.C. § 503(B)(1)* (related document(s):1002 Application for Administrative Expenses). Filed by NEMT Insurance DE LLC, Series 1 (Atkinson, Todd) (Entered: 12/30/2025)
12/30/2025	1142 (14 pgs; 2 docs)	Objection *to State National's Application for Payment of Administrative Claim* (related document(s):1002 Application for Administrative Expenses). Filed by ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/30/2025)
12/30/2025	1143 (4 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate) (Gershbein, Evan) (Entered: 12/30/2025)
12/30/2025	1144 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/30/2025)
12/31/2025	1145 (19 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Five - Court's Ruling held on December 12, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/31/2026. (mhen) (Entered: 12/31/2025)
12/31/2025	1146 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1129 Transcript) No. of Notices: 106. Notice Date 12/31/2025. (Admin.) (Entered: 12/31/2025)
01/01/2026	1147 (2 pgs)	Order Granting the Official Committee of Unsecured Creditors' Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases (Related Doc # 963), Signed on 1/1/2026. (abh4) (Entered: 01/02/2026)

01/02/2026	1148 (4 pgs)	Certificate *of Service re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate) (Gershbein, Evan) (Entered: 01/02/2026)
01/02/2026	1149 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 01/02/2026)
01/04/2026	1150 (4 pgs)	BNC Certificate of Mailing. (Related document(s):1147 Order on Motion to Seal) No. of Notices: 71. Notice Date 01/04/2026. (Admin.) (Entered: 01/04/2026)
01/04/2026	1151 (1 pg)	Order Allowing Interim Compensation and Reimbursement of Expenses (Related Doc # 1000) Signed on 1/4/2026. (tjl4) (Entered: 01/05/2026)
01/05/2026	1152 (17 pgs)	Certificate *of Service re: Notice of Filing of Sixth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1130 Notice) (Gershbein, Evan) (Entered: 01/05/2026)
01/05/2026	1153 (21 pgs)	Certificate *of Service re: 1) Second Supplemental Declaration of Zul Jamal in Connection with Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date; 2) Debtors Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts; 3) Order Extending Time to Assume or to Reject Unexpired Leases of Nonresidential Real Property; and 4) Order Granting the Motion to Seal the Letter to the Court* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1132 Declaration, 1133 Generic Motion, 1135 Generic Order, 1136 Order on Motion to Seal) (Gershbein, Evan) (Entered: 01/05/2026)
01/05/2026	1154 (8 pgs)	Certificate *of Service re: Objection to State Nationals Application for Payment of Administrative Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1142 Objection) (Gershbein, Evan) (Entered: 01/05/2026)
01/05/2026	1155 (7 pgs)	Notice *of Clarification Regarding Reply to Omnibus Objection*. (Related document(s):884 Reply) Filed by Alea Rachel Kennedy (anc4) (Entered: 01/06/2026)
01/06/2026	1156 (1 pg)	Withdrawal of Claim: *Claim #2128 with claim agent in the amount of $23.96* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1157 (1 pg)	Withdrawal of Claim: *Claim #2130 in the amount of $124.17 with claim agent* (Turner, John) (Entered: 01/06/2026)

01/06/2026	1158 (1 pg)	Withdrawal of Claim: *Claim #2129 in the amount of $182.63 from claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1159 (1 pg)	Withdrawal of Claim: *Claim #56 in the amount of $102.21 from claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1160 (1 pg)	Withdrawal of Claim: *Claim #2131 in the amount of $81.30 from claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1161 (5 pgs)	Stipulation By ModivCare Inc. and Lisa Sallaj. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):657 Motion for Relief From Stay, 790 Objection, 881 Response) (Davidson, Timothy) (Entered: 01/06/2026)
01/06/2026	1162 (3 pgs)	Certificate *of Service (Supplemental) re: Order Granting Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):874 Order on Motion to Seal, 913 Certificate) (Gershbein, Evan) (Entered: 01/06/2026)
01/07/2026	1163 (5 pgs)	Stipulation and Agreed Order Resolving Motion of Lisa Sallaj for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors, Signed on 1/7/2026 (Related document(s):657 Motion for Relief From Stay) (gc4) (Entered: 01/07/2026)
01/07/2026	1164 (2 pgs)	Notice *of Hearing*. (Related document(s):1002 Application for Administrative Expenses, Hearing (Bk)) Filed by National Specialty Insurance Company (Mayer, Simon) (Entered: 01/07/2026)
01/07/2026	1165 (3 pgs)	Affidavit Re: *Publication of the Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims in the New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice) (Gershbein, Evan) (Entered: 01/07/2026)
01/07/2026	1166 (21 pgs; 2 docs)	BNC Certificate of Mailing. (Related document(s):1145 Transcript) No. of Notices: 106. Notice Date 01/07/2026. (Admin.) Additional attachment(s) added on 1/9/2026 (rbw4) (Entered: 01/07/2026)
01/12/2026	1167 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order Resolving Motion of Lisa Sallaj for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1163 Generic Order) (Gershbein, Evan) (Entered: 01/12/2026)
01/13/2026	1168 (13 pgs; 3 docs)	Agreed Order and Certificate of Counsel (Filed By ModivCare Inc.). (Related document(s):670 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 01/13/2026)

01/14/2026	1169 (4 pgs)	Order Granting Debtors' Omnibus Objection to Certain Proofs of Claim, Signed on 1/14/2026 (Related document(s):670 Objection to Claim) (gc4) (Entered: 01/14/2026)
01/14/2026	1170 (1 pg)	Withdrawal of Claim: *No. 14 filed by Ector CAD* (Stecker, Don) (Entered: 01/14/2026)
01/14/2026	1171 (1 pg)	Withdrawal of Claim: *Modivcare Solutions, LLC - Siriuspoint America Insurance Company - Claim No. 723* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1172 (1 pg)	Withdrawal of Claim: *Modivcare, Inc. - Siriuspoint America Insurance Company - Claim No. 724* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1173 (1 pg)	Withdrawal of Claim: *Modivcare Solutions, LLC - Atlantic Specialty Insurance Company - Claim No. 725* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1174 (1 pg)	Withdrawal of Claim: *Modivcare, Inc. - Atlantic Specialty Insurance Company - Claim No. 726* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1175 (1 pg)	Withdrawal of Claim: *Ride Plus, LLC - Atlantic Specialty Insurance Company - Claim No. 727* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1176 (1 pg)	Withdrawal of Claim: *A & B Homecare Solutions, L.L.C. - Atlantic Specialty Insurance Company - Claim No. 728* (Williams, Scott) (Entered: 01/14/2026)
01/15/2026	1177 (5 pgs)	Stipulation By ModivCare Inc. and Helen Denise Walker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/15/2026)
01/15/2026	1178 (46 pgs; 3 docs)	Statement */ Fourth Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from December 1, 2025 Through December 29, 2025* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B) (Koster, Charles) (Entered: 01/15/2026)
01/15/2026	1179 (6 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 2) Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1030 Notice, 1055 Order Confirming Chapter 11 Plan, 1075 Certificate, 1087 Certificate) (Gershbein, Evan) (Entered: 01/15/2026)

01/16/2026	1180 (2 pgs)	Withdraw Document (Filed By National Specialty Insurance Company). (Related document(s):1002 Application for Administrative Expenses) (Mayer, Simon) (Entered: 01/16/2026)
01/16/2026	1181 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Helen Denise Walker, Signed on 1/16/2026 (Related document(s):1177 Stipulation) (tjl4) (Entered: 01/16/2026)
01/19/2026	1182 (3219 pgs)	Certificate *of Service re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice) (Gershbein, Evan) (Entered: 01/19/2026)
01/19/2026	1183 (12 pgs)	Certificate *of Service re: Order Granting Debtors' Omnibus Objection to Certain Proofs of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1169 Generic Order) (Gershbein, Evan) (Entered: 01/19/2026)
01/19/2026	1184 (6 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; 3) Modified Official Form 410 Proof of Claim; and 4) Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 01/19/2026)
01/19/2026	1185 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 01/19/2026)
01/20/2026	1186 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 01/20/2026)
01/20/2026	1187 (1 pg)	MOTION to Appear Pro Hac Vice for Thomas F. Koegel (Fee Paid: $100, receipt number A26844734) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 01/20/2026)

01/20/2026	1188 (86 pgs; 15 docs)	Objection *of HealthSpring, Inc. to Debtor's Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (related document(s):1133 Generic Motion). Filed by HealthSpring, Inc. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Declaration of Kayla McKenzie # 14 Declaration of Dana Mott) (Jones, Erin) (Entered: 01/20/2026)
01/20/2026	1189 (15 pgs; 15 docs)	Sealed Document *UNREDACTED Objection of HealthSpring, Inc.'s Objection to Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts and related exhibits* (Filed By HealthSpring, Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Declaration of Kayla McKenzie # 14 Declaration of Dana Mott) (Jones, Erin) (Entered: 01/20/2026)
01/20/2026	1190 (6 pgs; 2 docs)	Motion to Seal *UNREDACTED Objection of HealthSpring, Inc. to Debtor's Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts and related Exhibits - Filed Under Seal at Docket No. 1189* Filed by Interested Party HealthSpring, Inc. (Attachments: # 1 Proposed Order) (Jones, Erin) (Entered: 01/20/2026)
01/21/2026	1191 (2 pgs)	Notice *of Withdrawal of Limited Objection to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases*. Filed by Keystone Quality Transport, Lifestar Response of Maryland, Inc. (Conley, Phillip) (Entered: 01/21/2026)
01/21/2026	1192 (5 pgs)	*Docketed in Error. Previously filed and signed at ECF Nos. 1177, 1181 * Stipulation By ModivCare Inc. and Helen Denise Walker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy)Modified on 1/21/2026 (tjl4). (Entered: 01/21/2026)
01/21/2026	1193 (5 pgs)	Stipulation By ModivCare Inc. and Deborah Slaughter. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/21/2026)
01/21/2026	1194 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Deborah Slaughter, Signed on 1/21/2026 (Related document(s):1193 Stipulation) (gc4) (Entered: 01/21/2026)
01/21/2026	1195 (1 pg)	Order Granting Motion for Thomas F. Koegel To Appear pro hac vice (Related Doc # 1187) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 1/21/2026. (gc4) (Entered: 01/21/2026)
01/21/2026	1196 (12 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Stay to Helen Denise Walker* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1181 Generic Order) (Gershbein, Evan) (Entered: 01/21/2026)
01/26/2026	1197 (60 pgs)	Statement / *White & Case LLP's Fourth Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the period from December 1, 2025 to and including December 29, 2025*

		(Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 01/26/2026)
01/26/2026	1198 (12 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Stay to Deborah Slaughter* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1194 Generic Order) (Gershbein, Evan) (Entered: 01/26/2026)
01/27/2026	1199 (1 pg)	MOTION to Appear Pro Hac Vice for Nimrod H. Aviad (Fee Paid: $100, receipt number A26864258) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 01/27/2026)
01/27/2026	1200 (5 pgs)	Stipulation By ModivCare Inc. and Michael Walsh. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/27/2026)
01/27/2026	1201 (31 pgs; 2 docs)	Motion *of Reorganized Debtors for Entry of an Order: (A) Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections; (B) the Form of Objection Notice; and (C) Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 01/27/2026)
01/28/2026	1202 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:45 AM. Appearances: See attached. Additional appearances: Jonathan Weichselbaum for the Debtor. ERO: Yes. Status Conference set for 2/04/2026 at 8:30 AM following filing of related documents and deposition. (Related document(s):1133 Generic Motion, 1188 Objection). **Status conference to be held on 2/4/2026 at 08:30 AM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 01/28/2026)
01/28/2026	1203 (1 pg)	PDF with attached Audio File. Court Date & Time [1/28/2026 8:30:02 AM]. File Size [7149 KB]. Run Time [00:14:54]. (admin). (Entered: 01/28/2026)
01/28/2026	1204 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Michael Walsh, Signed on 1/28/2026 (Related document(s):1200 Stipulation) (gc4) (Entered: 01/28/2026)
01/28/2026	1205 (1 pg)	Order Granting Motion for Nimrod H. Aviad To Appear pro hac vice (Related Doc # 1199) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 1/28/2026. (gc4) (Entered: 01/28/2026)
01/28/2026	1206 (7 pgs)	Notice *Regarding Status of Various Cure Objections*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 01/28/2026)
01/29/2026	1207	Courtroom Minutes. Time Hearing Held: 11:09 AM to 11:12 AM. Appearances: No appearances. ERO: Yes. Motion 663 is denied on the record without prejudice. (Related document(s):663 Generic Application) (gc4) (Entered: 01/29/2026)
01/29/2026	1208 (1 pg)	PDF with attached Audio File. Court Date & Time [1/29/2026 11:09:10 AM]. File Size [1049 KB]. Run Time [00:02:11]. (admin).

		(Entered: 01/29/2026)
01/29/2026	1209 (9 pgs)	Motion to Compel *Debtors to Prosecute or Resolve Claim Objection* Filed by Creditor Alea Rachel Kennedy (abh4) (Entered: 01/29/2026)
01/30/2026	1210 (1 pg)	Notice *Friendly Medical Transportation's Notice of Withdrawal of its Limited Objection to Debtors' Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases*. (Related document(s):605 Notice, 723 Notice) Filed by Friendly Medical Transportation (McKay, Zachary) (Entered: 01/30/2026)
01/30/2026	1211 (5 pgs)	Stipulation By ModivCare Inc. and Edwin Barroso-Perez. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1212 (5 pgs)	Stipulation By ModivCare Inc. and Connie Smith. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1213 (13 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):1188 Objection, 1189 Sealed Document, 1202 Courtroom Minutes) (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1214 (7 pgs)	Declaration re: */ Declaration of Kenneth Shepard in Support of Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (Filed By ModivCare Inc.).(Related document(s):1213 Response) (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1215 (5 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 01/30/2026)
01/30/2026	1216 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 01/30/2026)
02/02/2026	1217 (1 pg)	MOTION to Appear Pro Hac Vice for Joshua M. Robbins (Fee Paid: $100, receipt number A26882194) Filed by Interested Party HealthSpring, Inc. (Robbins, Joshua) (Entered: 02/02/2026)
02/02/2026	1218 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Edwin Barroso-Perez, Signed on 2/2/2026 (Related document(s):1211 Stipulation) (gc4) (Entered: 02/02/2026)

02/02/2026	1219 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Connie Smith, Signed on 2/2/2026 (Related document(s):1212 Stipulation) (gc4) (Entered: 02/02/2026)
02/02/2026	1220 (13 pgs)	Certificate *of Service re: 1) Motion of Reorganized Debtors for Entry of an Order: (A) Approving Procedures for Reorganized Debtors Filing of Omnibus Claims Objections; (B) the Form of Objection Notice; and (C) Granting Related Relief; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Michael Walsh* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1201 Generic Motion, 1204 Generic Order) (Gershbein, Evan) (Entered: 02/02/2026)
02/03/2026	1221 (1 pg)	Order Granting Motion for Joshua M. Robbins To Appear pro hac vice (Related Doc # 1217) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 2/3/2026. (gc4) (Entered: 02/03/2026)
02/03/2026	1222 (5 pgs)	Stipulation By ModivCare Inc. and Norman Fishbein. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/03/2026)
02/03/2026	1223 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $70444092 disbursed (Filed By ModivCare Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1224 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $1571363 disbursed (Filed By Higi SH LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1225 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $3457675 disbursed (Filed By Valued Relationships, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1226 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $189422794 disbursed (Filed By ModivCare Solutions, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1227 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $57018124 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1228 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1229 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1230 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Bell, Brandon) (Entered: 02/03/2026)

02/03/2026	1231 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1232 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1233 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1234 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1235 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Health Trans, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1236 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1237 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1238 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1239 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1240 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By MLA Sales, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1241 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By National MedTrans, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1242 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By OEP AM, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1243 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1244 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Bell, Brandon) (Entered: 02/03/2026)

02/03/2026	1245 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By TriMed, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1246 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/04/2026	1247 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:57 AM. Appearances: See attached. Additional appearances: Jonathan Weichselbaum and Betsy Marks for the Debtor. ERO: Yes. Hearing for motion 1133 set for 2/13/2026 at 1:00 PM virtually. Counsel may contact the Case Manager to schedule a Status Conference on discovery issues prior to the hearing if need arises. Counsel may file a short Sur-Reply in advance of the hearing. (Related document(s):1133 Generic Motion) **Hearing scheduled for 2/13/2026 at 01:00 PM at telephone and video conference.** (gc4) (Entered: 02/04/2026)
02/04/2026	1248 (1 pg)	PDF with attached Audio File. Court Date & Time [2/4/2026 8:30:42 AM]. File Size [14581 KB]. Run Time [00:30:23]. (admin). (Entered: 02/04/2026)
02/04/2026	1249 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Norman Fishbein, Signed on 2/4/2026 (Related document(s):1222 Stipulation) (gc4) (Entered: 02/04/2026)
02/04/2026	1250 (31 pgs; 3 docs)	Application for Administrative Expenses *HEXAWARE TECHNOLOGIES LIMITEDS REQUEST FOR ALLOWANCE AND PAYMENT OF AN ADMINISTRATIVE CLAIM*. Objections/Request for Hearing Due in 21 days. Filed by Creditor Hexaware Technologies Limited (Attachments: # 1 Proposed Order Ex. A (Proposed Order) # 2 Exhibit Ex. B (Invoices)) (Billingsley, James) (Entered: 02/04/2026)
02/04/2026	1251 (12 pgs)	Certificate *of Service re: 1) Reorganized Debtors Reply in Support of Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts; and 2) Declaration of Kenneth Shepard in Support of Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1213 Response, 1214 Declaration) (Gershbein, Evan) (Entered: 02/04/2026)
02/04/2026	1252 (15 pgs)	Certificate *of Service re: Notice Regarding the Status of Various Cure Objections* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1206 Notice) (Gershbein, Evan) (Entered: 02/04/2026)
02/04/2026	1253 (12 pgs)	BNC Certificate of Mailing. (Related document(s):1218 Generic Order) No. of Notices: 106. Notice Date 02/04/2026. (Admin.) (Entered: 02/04/2026)
02/04/2026	1254 (12 pgs)	BNC Certificate of Mailing. (Related document(s):1219 Generic Order) No. of Notices: 106. Notice Date 02/04/2026. (Admin.) (Entered: 02/04/2026)

02/05/2026	1255 (17 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Edwin Barroso-Perez; and 2) Stipulation and Agreed Order Granting Relief from Stay to Connie Smith* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1218 Generic Order, 1219 Generic Order) (Gershbein, Evan) (Entered: 02/05/2026)
02/06/2026	1256 (31 pgs; 5 docs)	Objection to Claim Number by Claimant Alea Kennedy. Alea Kennedy. / *Reorganized Debtors' Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy)* (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order) (Davidson, Timothy) (Entered: 02/06/2026)
02/06/2026	1257 (19 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Second Omnibus Objection to Certain Claims* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 02/06/2026)
02/06/2026	1258 (5 pgs)	Stipulation By ModivCare Inc. and Heather Swick. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/06/2026)
02/06/2026	1259 (1 pg)	MOTION to Appear Pro Hac Vice for Ruben Reyna (Fee Paid: $100, receipt number A26900921) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 02/06/2026)
02/06/2026	1260 (13 pgs; 2 docs)	Adversary case 26-03035. Nature of Suit: (91 (Declaratory judgment)), (72 (Injunctive relief - other)) Complaint by HealthSpring, Inc. against ModivCare Solutions, LLC. Fee Amount $350 (Attachments: # 1 Adversary Proceeding Cover Sheet) (Jones, Erin) (Entered: 02/06/2026)
02/06/2026	1261 (2 pgs)	Request for Issuance of Summons on ModivCare Solutions LLC. (Jones, Erin) (Entered: 02/06/2026)
02/07/2026	1262 (78 pgs; 9 docs)	Emergency Motion / *Reorganized Debtors' Emergency Motion for Protective Order or, in the Alternative, to Bifurcate Hearing in Connection with Motion to Reject* Filed by Debtor ModivCare Inc. Hearing scheduled for 2/9/2026 *at 08:30 AM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Proposed Order) (Davidson, Timothy)Modified on 2/9/2026 (tjl4). (Entered: 02/07/2026)*
02/08/2026	1263 (6 pgs)	Objection *of HealthSpring, Inc. to Reorganized Debtor's Emergency Motion for Protective Order or, in the alternative, to Bifurcate Hearing in Connection with Motion to Reject* (related document(s):1262 Emergency Motion (with hearing date)). Filed by HealthSpring, Inc. (Jones, Erin) (Entered: 02/08/2026)
02/09/2026	1264	Summons Not Issued as to ModivCare Solutions, LLC due to these deficiencies: Summons provided is for an adversary proceeding. Attorney or Plaintiff notified of deficiencies by NEF. (amp4) (Entered: 02/09/2026)
02/09/2026	1265 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Heather Swick, Signed on 2/9/2026 (Related document(s):1258 Stipulation) (gc4) (Entered: 02/09/2026)

02/09/2026	1266 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:39 AM. Appearances: See attached. ERO: Yes. Counsel updated the Court on 1133 which is to be heard on 2/13/2026 at 1:00 PM. (Related document(s):1133 Generic Motion, 1262 Emergency Motion (with hearing date)) (gc4) (Entered: 02/09/2026)
02/09/2026	1267 (1 pg)	PDF with attached Audio File. Court Date & Time [02/09/2026 08:30:34 AM]. File Size [3931 KB]. Run Time [00:08:15]. (admin). (Entered: 02/09/2026)
02/09/2026	1268 (734 pgs; 2 docs)	Final Application for Compensation / *First and Final Application of Latham & Watkins LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Co-Counsel to the Debtors for the Period of August 20, 2025 Through December 29, 2025* for Latham & Watkins LLP, Debtor's Attorney, Period: 8/20/2025 to 12/29/2025, Fee: $22673312.75, Expenses: $460717.30. Objections/Request for Hearing Due in 21 days. Filed by Attorney Latham & Watkins LLP (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1269 (185 pgs; 2 docs)	Final Application for Compensation / *First and Final Application of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of August 20, 2025 Through December 29, 2025* for Hunton Andrews Kurth LLP, Debtor's Attorney, Period: 8/20/2025 to 12/29/2025, Fee: $1401454.50, Expenses: $109498.32. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1270 (469 pgs; 2 docs)	Final Application for Compensation / *FTI Consulting Inc.'s Application for Final Allowance and Payment of Fees and Expenses as Financial Advisor, Chief Transformation Officer, and Additional Personnel for the Debtors for the Period from August 20, 2025 Through December 29, 2025* for FTI Consulting, Inc., Financial Advisor, Period: 8/20/2025 to 12/29/2025, Fee: $9252783.25, Expenses: $64070.21. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1271 (139 pgs; 2 docs)	Final Application for Compensation / *Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025 through December 29, 2025* for Ernst & Young LLP, Other Professional, Period: 8/20/2025 to 12/29/2025, Fee: $1707182.80, Expenses: $0. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1272 (15 pgs; 2 docs)	Final Application for Compensation / *First and Final Fee Application of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors, for the Period from August 20, 2025 through December 29, 2025* for Cresa, LLC, Other Professional, Period: 8/20/2025 to 12/29/2025, Fee: $1950000.00, Expenses: $0.00. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)

02/09/2026	1273 (109 pgs; 2 docs)	Final Application for Compensation for Quinn Emanuel Urquhart & Sullivan, LLP, Special Counsel, Period: 9/1/2025 to 12/29/2025, Fee: $2,056,575.25, Expenses: $17,184.47. Objections/Request for Hearing Due in 21 days. Filed by Spec. Counsel Quinn Emanuel Urquhart & Sullivan, LLP (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 02/09/2026)
02/09/2026	1274 (5 pgs)	Stipulation By ModivCare Inc. and Santa Guerrero. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1275 (18 pgs)	Certificate *of Service re: Documents Served on February 4, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1223 Debtor-in-Possession Monthly Operating Report, 1224 Debtor-in-Possession Monthly Operating Report, 1225 Debtor-in-Possession Monthly Operating Report, 1226 Debtor-in-Possession Monthly Operating Report, 1227 Debtor-in-Possession Monthly Operating Report, 1228 Debtor-in-Possession Monthly Operating Report, 1229 Debtor-in-Possession Monthly Operating Report, 1230 Debtor-in-Possession Monthly Operating Report, 1231 Debtor-in-Possession Monthly Operating Report, 1232 Debtor-in-Possession Monthly Operating Report, 1233 Debtor-in-Possession Monthly Operating Report, 1234 Debtor-in-Possession Monthly Operating Report, 1235 Debtor-in-Possession Monthly Operating Report, 1236 Debtor-in-Possession Monthly Operating Report, 1237 Debtor-in-Possession Monthly Operating Report, 1238 Debtor-in-Possession Monthly Operating Report, 1239 Debtor-in-Possession Monthly Operating Report, 1240 Debtor-in-Possession Monthly Operating Report, 1241 Debtor-in-Possession Monthly Operating Report, 1242 Debtor-in-Possession Monthly Operating Report, 1243 Debtor-in-Possession Monthly Operating Report, 1244 Debtor-in-Possession Monthly Operating Report, 1245 Debtor-in-Possession Monthly Operating Report, 1246 Debtor-in-Possession Monthly Operating Report, 1249 Generic Order) (Gershbein, Evan) (Entered: 02/09/2026)
02/09/2026	1276 (43 pgs; 2 docs)	Final Application for Compensation / *Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025* for Moelis & Company LLC, Other Professional, Period: 8/20/2025 to 12/29/2025, Fee: $11400000.00, Expenses: $51544.17. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/10/2026	1277 (2 pgs)	Withdrawal of Claim: 10 (dah4) (Entered: 02/10/2026)
02/10/2026	1278 (11 pgs; 2 docs)	*Withdrawn* Application for Administrative Expenses . Objections/Request for Hearing Due in 21 days. Filed by Creditor Salesforce, Inc. (Attachments: # 1 Proposed Order) (Chou, Emily)Modified on 4/10/2026 (gc4). (Entered: 02/10/2026)
02/10/2026	1279 (7 pgs)	Declaration re: *Declaration in Support of the Application for Allowance and Payment of Administrative Expense Claim of Salesforce, Inc* (Filed By Salesforce, Inc.).(Related document(s):1278 Application for Administrative Expenses) (Chou, Emily) (Entered: 02/10/2026)

02/10/2026	1280 (1 pg)	Order Granting Motion for Ruben Reyna To Appear pro hac vice (Related Doc # 1259) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 2/10/2026. (gc4) (Entered: 02/10/2026)
02/10/2026	1281 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Santra Guerrero, Signed on 2/10/2026 (Related document(s):1274 Stipulation) (abh4) (Entered: 02/11/2026)
02/11/2026	1282 (62 pgs; 8 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7) (Davidson, Timothy) (Entered: 02/11/2026)
02/11/2026	1283 (66 pgs; 66 docs)	Sealed Document *Witness and Exhibit List* (Filed By HealthSpring, Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18 # 19 Exhibit 19 # 20 Exhibit 20 # 21 Exhibit 21 # 22 Exhibit 22 # 23 Exhibit 23 # 24 Exhibit 24 # 25 Exhibit 25 # 26 Exhibit 26 # 27 Exhibit 27 # 28 Exhibit 28 # 29 Exhibit 29 # 30 Exhibit 30 # 31 Exhibit 31 # 32 Exhibit 32 # 33 Exhibit 33 # 34 Exhibit 34 # 35 Exhibit 35 # 36 Exhibit 36 # 37 Exhibit 37 # 38 Exhibit 38 # 39 Exhibit 39 # 40 Exhibit 40 # 41 Exhibit 41 # 42 Exhibit 42 # 43 Exhibit 43 # 44 Exhibit 44 # 45 Exhibit 45 # 46 Exhibit 46 # 47 Exhibit 47 # 48 Exhibit 48 # 49 Exhibit 49 # 50 Exhibit 50 # 51 Exhibit 51 # 52 Exhibit 52 # 53 Exhibit 53 # 54 Exhibit 54 # 55 Exhibit 55 # 56 Exhibit 56 # 57 Exhibit 57 # 58 Exhibit 58 # 59 Exhibit 59 # 60 Exhibit 60 # 61 Exhibit 61 # 62 Exhibit 62 # 63 Exhibit 63 # 64 Exhibit 64 # 65 Exhibit 65) (Jones, Erin) (Entered: 02/11/2026)
02/11/2026	1284 (5 pgs; 2 docs)	Motion to Seal *HealthSpring, Inc.'s Witness/Exhibit List and Exhibits Filed at Dkt. No. 1283* Filed by Interested Party HealthSpring, Inc. (Attachments: # 1 Proposed Order) (Jones, Erin) (Entered: 02/11/2026)
02/11/2026	1285 (20 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; 3) Modified Official Form 410 Proof of Claim; and 4) Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/11/2026)
02/11/2026	1286 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 02/11/2026)
02/11/2026	1287 (7 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of*

		the Bankruptcy Code; 3) Modified Official Form 410 Proof of Claim; and 4) Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/11/2026)
02/11/2026	1288 (322 pgs; 2 docs)	Final Application for Compensation */ Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through December 29, 2025* for AlixPartners, LLP, Financial Advisor, Period: 9/10/2025 to 12/29/2025, Fee: $4,980,847.00, Expenses: $41,910.29. Objections/Request for Hearing Due in 21 days. Filed by Financial Advisor AlixPartners, LLP (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 02/11/2026)
02/11/2026	1289 (17 pgs)	Certificate *of Service re: 1) Reorganized Debtors Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy); and 2) Reorganized Debtors Second Omnibus Objection to Certain Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1256 Objection to Claim, 1257 Objection to Claim) (Gershbein, Evan) (Entered: 02/11/2026)
02/12/2026	1290 (53 pgs; 2 docs)	Final Application for Compensation */ White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 through December 29, 2025* for White & Case LLP, Attorney, Period: 9/9/2025 to 12/29/2025, Fee: $13,893,521.0, Expenses: $300,469.13. Objections/Request for Hearing Due in 21 days. Filed by Attorney White & Case LLP (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 02/12/2026)
02/12/2026	1291 (5 pgs)	Declaration re: */ Fourth Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):593 Declaration, 616 Order on Application to Employ, 965 Declaration, 1079 Declaration) (Koster, Charles) (Entered: 02/12/2026)
02/12/2026	1292 (16 pgs; 2 docs)	Reply *Sur-Reply of HealthSpring, Inc. to Debtor's Reply to Objection to Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (related document(s):1133 Generic Motion). Filed by HealthSpring, Inc. (Attachments: # 1 Exhibit A) (Jones, Erin) (Entered: 02/12/2026)
02/12/2026	1293 (16 pgs; 2 docs)	Exhibit List (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1283 Sealed Document, 1292 Reply) (Attachments: # 1 Exhibibit 69) (Jones, Erin) (Entered: 02/12/2026)
02/12/2026	1294 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Heather Swick* (Filed By Kurtzman Carson

		Consultants, LLC d/b/a Verita Global).(Related document(s):1265 Generic Order) (Gershbein, Evan) (Entered: 02/12/2026)
02/12/2026	1295 (8 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Santa Guerrero; and 2) Reorganized Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1281 Generic Order, 1282 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 02/12/2026)
02/12/2026	1296 (19 pgs; 2 docs)	Final Application for Compensation / *First and Final Application of Mills Halstead Zaloudek, LLC as Real Estate Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of October 24, 2025 Through December 29, 2025* for Mills Halstead Zaloudek, LLC, Attorney, Period: 10/24/2025 to 12/29/2025, Fee: $5084.50, Expenses: $0. Objections/Request for Hearing Due in 21 days. Filed by Attorney Mills Halstead Zaloudek, LLC (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/12/2026)
02/13/2026	1297 (1 pg)	Courtroom Minutes. Time Hearing Held: 1:00 pm to 3:01 pm; 3:11 pm to 4:54 pm. Appearances: see log. Additional appearances: Elizabeth Betsy Marks, George Klidonas, Jonathan Jon Weichselbaum, Meghana Koenitzer, Matt Carter, and Joe Simons. Sworn and testified witness: Ken Shepard and Kayla McKenzie. Admitted exhibits: 1282-1, 1282-2, and 1282-4 through 1282-6,1283-57, 1283-1, 1283-59, 1283-20, 1283-28, 1283-32, 1283-35, 1283-36, 1283-37, 1283-46, 1283-50, 1283-9, and 1283-56. Motion hearing held. Oral argument heard on the record. Motion 1133 is to taken under advisement. The Court will issue its ruling on 2/17/26 at 4:00 pm. Mr. Robbins may proffer the additional witness testimony before the court, or he may consider Ms. Marks proposition of admitting the declaration as stated on the record. ERO: yes. (Related document(s):1133 Generic Motion) **Hearing scheduled for 2/17/2026 at 04:00 PM at telephone and video conference.** (abh4) (Entered: 02/13/2026)
02/13/2026	1298 (9 pgs)	Certificate *of Service re: Documents Served on or Before February 10, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1268 Application for Compensation, 1269 Application for Compensation, 1270 Application for Compensation, 1271 Application for Compensation, 1272 Application for Compensation, 1276 Application for Compensation) (Gershbein, Evan) (Entered: 02/13/2026)
02/16/2026	1299 (1 pg)	MOTION to Appear Pro Hac Vice for Randall L. Hagen (Fee Paid: $100, receipt number A26923188) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 02/16/2026)
02/16/2026	1300 (3 pgs)	Notice of Appearance and Request for Notice Filed by Paul M. Lopez Filed by on behalf of COLLIN COUNTY TAX ASSESSOR/COLLECTOR (Lopez, Paul) (Entered: 02/16/2026)
02/16/2026	1301 (2 pgs)	Order Granting HealthSpring, Inc.s Motion to Seal Objection of HealthSpring, Inc. to Debtors Motion for an Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts [Docket No. 1133] and Supporting Declarations and Exhibits (Related Doc # 1190), Signed on 2/16/2026. (abh4) (Entered: 02/16/2026)
02/17/2026	1302 (1 pg)	Order Granting Motion for Randall L. Hagen To Appear pro hac vice (Related Doc # 1299) **Note: Instructions to request Texas Southern**

		CM/ECF registration through PACER are found here Signed on 2/17/2026. (abh4) (Entered: 02/17/2026)
02/17/2026	1303 (9 pgs)	Brief (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1292 Reply) (Jones, Erin) (Entered: 02/17/2026)
02/17/2026	1304 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Expedited (7 days)) by HealthSpring, Inc.. This is to order a transcript of Hearing on Debtors' Motion to Reject held on 02/13/2026 at 1:00 p.m. CST before Judge Alfredo R. Perez. Court Reporter/Transcriber: Veritext Legal Solutions (Filed By HealthSpring, Inc.). (Jones, Erin) Electronically forwarded to Veritext Legal Solutions on 2/17/2026. Estimated completion date: 2/24/2026. Modified on 2/17/2026 (smg4). (Entered: 02/17/2026)
02/17/2026	1305 (2 pgs)	Stipulation By HealthSpring, Inc. and ModivCare Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? No. (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1292 Reply, 1297 Courtroom Minutes, 1303 Brief) (Jones, Erin) (Entered: 02/17/2026)
02/17/2026	1306 (6 pgs)	Stipulation By ModivCare Inc. and Maria Angulo. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/17/2026)
02/17/2026	1307 (2 pgs)	Notice -- *Genesys Cloud Services Inc.'s Notice Of Withdrawal Of Its Objection To Debtors' Notice Of Potential Assumption Of Certain Debtors' Executory Contracts And Unexpired Leases*. (Related document(s):743 Objection) Filed by Genesys Cloud Services Inc (Rieger, Shannon) (Entered: 02/17/2026)
02/17/2026	1308 (2 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 02/17/2026)
02/18/2026	1309 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Maria Angulo, Signed on 2/18/2026 (Related document(s):1306 Stipulation) (abh4) (Entered: 02/18/2026)
02/18/2026	1310 (1 pg)	PDF with attached Audio File. Court Date & Time [02/17/2026 04:00:03 PM]. File Size [12592 KB]. Run Time [00:26:40]. (admin). (Entered: 02/18/2026)
02/18/2026	1311 (22 pgs; 2 docs)	Certificate of No Objection *Regarding Motion of Reorganized Debtors for Entry of an Order: (A) Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections; (B) the Form of Objection Notice; and (C) Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):1201 Generic Motion) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/18/2026)
02/18/2026	1312 (4 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By

		Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/18/2026)
02/19/2026	1313 (19 pgs)	Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief, Signed on 2/19/2026 (Related document(s):1201 Generic Motion, 1311 Certificate of No Objection) (abh4) (Entered: 02/19/2026)
02/18/2026	1314 (20 pgs)	Reply *of Claimant to Debtor's Objection to Claim Nos. 1678 and 1679*. Filed by Alea Rachel Kennedy (dmm4) (Entered: 02/19/2026)
02/19/2026	1315 (5 pgs)	Certificate *of Service re: First and Final Application of Mills Halstead Zaloudek, LLC as Real Estate Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of October 24, 2025 Through December 29, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1296 Application for Compensation) (Gershbein, Evan) (Entered: 02/19/2026)
02/19/2026	1316 (15 pgs)	BNC Certificate of Mailing. (Related document(s):1301 Order on Motion to Seal) No. of Notices: 71. Notice Date 02/19/2026. (Admin.) (Entered: 02/19/2026)
02/20/2026	1317 (14 pgs; 3 docs)	Notice *of Filing of Revised Proposed Order Authorizing the Reorganized Debtors to Reject Certain Executory Contracts*. (Related document(s):1133 Generic Motion) Filed by ModivCare Inc. (Attachments: # 1 Proposed Order # 2 Exhibit A) (Davidson, Timothy) (Entered: 02/20/2026)
02/20/2026	1318 (1 pg)	PDF with attached Audio File. Court Date & Time [02/13/2026 01:00:20 PM]. File Size [57069 KB]. Run Time [02:01:35]. (admin). (Entered: 02/20/2026)
02/20/2026	1319 (26 pgs; 3 docs)	Response (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1292 Reply, 1310 MP3, 1317 Notice) (Attachments: # 1 Exhibit A - Email Correspondence # 2 Exhibit B - Proposed Order on Motion to Reject) (Jones, Erin) (Entered: 02/20/2026)
02/20/2026	1320 (6 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before February 18, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/20/2026)
02/17/2026	1321	Courtroom Minutes. Time Hearing Held: 4:00 pm to 4:19 pm; 4:37 pm to 4:45 pm. Appearances: Elizabeth Betsy Marks, George Klidonas, Jonathan Jon Weichselbaum, Meghana Koenitzer, Joshua Robbins, Steven Hamiliton, Thomas Koegel, Ruben Reyna, and Erin Jones. Motion hearing held. Oral argument heard on the record. The debtor is permitted to reject the contract for reasons stated on the record. Debtor is to submit a proposed form of order. ERO: yes. (Related document(s):1133 Generic Motion) (abh4) (Entered: 02/23/2026)
02/23/2026	1322 (1 pg)	Order Setting Hearing, Signed on 2/23/2026 (Related document(s):1209 Motion to Compel) **Hearing scheduled for 3/30/2026 at 09:00 AM at**

		telephone and video conference. (abh4) (Entered: 02/23/2026)
02/23/2026	1323 (9 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Maria Angulo* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1309 Generic Order) (Gershbein, Evan) (Entered: 02/23/2026)
02/24/2026	1324 (133 pgs; 2 docs)	Transcript RE: hearing motion held on 2/13/26 before Judge ALFREDO R. PEREZ. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 05/26/2026. (VeritextLegalSolutions) (Entered: 02/24/2026)
02/24/2026	1325 (4 pgs)	Order Authorizing the Reorganized Debtors to Reject Certain Executory Contracts (Related Doc # 1133), Signed on 2/24/2026. (abh4) (Entered: 02/24/2026)
02/24/2026	1326 (5 pgs)	Certificate *of Service re: Order Approving Procedures for Reorganized Debtors Filing of Omnibus Claims Objections and Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1313 Generic Order) (Gershbein, Evan) (Entered: 02/24/2026)
02/26/2026	1327 (6 pgs)	Stipulation By ModivCare Inc. and Sonia Burgos. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/26/2026)
02/27/2026	1328 (7 pgs)	Second Notice *Regarding the Status of Various Cure Objections*. (Related document(s):1206 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 02/27/2026)
02/27/2026	1329 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Sonia Burgos, Signed on 2/27/2026 (Related document(s):1327 Stipulation) (gc4) (Entered: 02/27/2026)
02/27/2026	1330 (7 pgs)	Stipulation By ModivCare Inc. and Cindy Bosley. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/27/2026)
02/27/2026	1331 (7 pgs)	Certificate *of Service re: Order Authorizing the Reorganized Debtors to Reject Certain Executory Contracts* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1325 Generic Order) (Gershbein, Evan) (Entered: 02/27/2026)
02/27/2026	1332 (18 pgs)	BNC Certificate of Mailing. (Related document(s):1324 Transcript) No. of Notices: 106. Notice Date 02/27/2026. (Admin.) (Entered: 02/27/2026)
03/01/2026	1333 (13 pgs)	BNC Certificate of Mailing. (Related document(s):1329 Generic Order) No. of Notices: 106. Notice Date 03/01/2026. (Admin.) (Entered: 03/01/2026)

03/01/2026	1334 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Cindy Bosley, Signed on 3/1/2026 (Related document(s):1330 Stipulation) (gc4) (Entered: 03/02/2026)
03/03/2026	1335 (3 pgs; 2 docs)	Certificate of No Objection (Filed By Quinn Emanuel Urquhart & Sullivan, LLP).(Related document(s):1273 Application for Compensation) (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 03/03/2026)
03/03/2026	1336 (4 pgs; 2 docs)	Certificate of No Objection *Regarding First and Final Application of Latham & Watkins LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Co-Counsel to the Debtors for the Period of August 20, 2025 Through December 29, 2025* (Filed By Latham & Watkins LLP).(Related document(s):1268 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1337 (4 pgs; 2 docs)	Certificate of No Objection *Regarding First and Final Application of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of August 20, 2025 Through December 29, 2025* (Filed By ModivCare Inc.).(Related document(s):1269 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1338 (5 pgs; 2 docs)	Certificate of No Objection *Regarding FTI Consulting Inc.'s Application for Final Allowance and Payment of Fees and Expenses as Financial Advisor, Chief Transformation Officer, and Additional Personnel for the Debtors for the Period from August 20, 2025 Through December 29, 2025* (Filed By FTI Consulting, Inc.).(Related document(s):1270 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1339 (7 pgs; 3 docs)	Certificate of No Objection *Regarding Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025 through December 29, 2025* (Filed By Ernst & Young LLP).(Related document(s):1271 Application for Compensation) (Attachments: # 1 Revised Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1340 (4 pgs; 2 docs)	Certificate of No Objection *Regarding First and Final Fee Application of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors, for the Period from August 20, 2025 through December 29, 2025* (Filed By Cresa, LLC).(Related document(s):1272 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1341 (5 pgs; 2 docs)	Certificate of No Objection *Regarding Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025* (Filed By Moelis & Company LLC).(Related document(s):1276 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)

03/03/2026	1342 (6 pgs)	Stipulation By ModivCare Inc. and Moira Sandrock. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/03/2026)
03/04/2026	1343 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Moira Sandrock, Signed on 3/4/2026 (Related document(s):1342 Stipulation) (gc4) (Entered: 03/04/2026)
03/04/2026	1344 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses (Related Doc # 1268) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1345 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses for Hunton Andrews Kurth LLP as Debtor's Bankruptcy Co-Counsel (Related Doc # 1269) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1346 (2 pgs)	Order Allowing Compensation and Reimbursement of Expenses for FTI Consulting, Inc. as Financial Advisor, Chief Transformation Officer, and Additional Personnel to the Debtors for the Period from August 20, 2025 Through December 29, 2025 (Related Doc # 1270) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1347 (2 pgs)	Order Granting First and Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025 through December 29, 2025 (Related Doc # 1271) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1348 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors (Related Doc # 1272) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1349 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses (Related Doc # 1273) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1350 (2 pgs)	Order Granting Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025 (Related Doc # 1276) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1351 (25 pgs; 2 docs)	Objection *To Final Request For Fees and Expenses by AlixPartners* (related document(s):1288 Application for Compensation). Filed by ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 03/04/2026)
03/05/2026	1352 (11 pgs)	Certificate *of Service re: 1) Second Notice Regarding the Status of Various Cure Objections; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Sonia Burgos* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1328 Notice, 1329 Generic Order) (Gershbein, Evan) (Entered: 03/05/2026)

03/05/2026	1353 (5 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Cindy Bosley* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1334 Generic Order) (Gershbein, Evan) (Entered: 03/05/2026)
03/05/2026	1354 (32 pgs)	Objection (related document(s):1290 Application for Compensation). Filed by ModivCare Topco, LLC (Goott, Miriam) (Entered: 03/05/2026)
03/05/2026	1355 (1 pg)	Proposed Order RE: (Filed By ModivCare Topco, LLC).(Related document(s):1354 Objection) (Goott, Miriam) (Entered: 03/05/2026)
03/06/2026	1356 (6 pgs)	Stipulation By ModivCare Inc. and Hannah Book. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/06/2026)
03/06/2026	1357 (6 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before February 25, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 03/06/2026)
03/06/2026	1358 (6 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before February 27, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 03/06/2026)
03/07/2026	1359 (2 pgs)	Certificate *of Non-Opposition* (Filed By Debra Jones).(Related document(s):1257 Objection to Claim) (Norwood, Bach) (Entered: 03/07/2026)
03/07/2026	1360 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Hannah Book, Signed on 3/7/2026 (Related document(s):1356 Stipulation) (gc4) (Entered: 03/09/2026)
03/09/2026	1361 (1 pg)	Order Granting HealthSpring, Inc.'s Motion to Seal (Related Doc # 1284) Signed on 3/9/2026. (gc4) (Entered: 03/09/2026)
03/09/2026	1362 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses for Mills Halstead Zaloudek as Debtors' Real Estate Counsel (Related Doc # 1296) Signed on 3/9/2026. (gc4) (Entered: 03/09/2026)
03/09/2026	1363 (8 pgs; 2 docs)	Motion to Extend Time / *Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/09/2026)

03/09/2026	1364 (8 pgs)	Certificate *of Service re: Documents Served on March 4, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1343 Generic Order, 1344 Order on Application for Compensation, 1345 Order on Application for Compensation, 1346 Order on Application for Compensation, 1347 Order on Application for Compensation, 1348 Order on Application for Compensation, 1350 Order on Application for Compensation, 1351 Objection) (Gershbein, Evan) (Entered: 03/09/2026)
03/10/2026	1365 (6 pgs)	Stipulation By ModivCare Inc. and Jhovanna Parker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/10/2026)
03/11/2026	1366 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Jhovanna Parker, Signed on 3/11/2026 (Related document(s):1365 Stipulation) (gc4) (Entered: 03/11/2026)
03/10/2026	1367 (27 pgs; 2 docs)	Response (related document(s):1257 Objection to Claim). (Attachments: # 1 Exhibit) (bnb6) (Entered: 03/11/2026)
03/11/2026	1368 (9 pgs)	Certificate *of Service re: Objection to Final Fee Application Filed by White & Case, LLP* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1354 Objection) (Gershbein, Evan) (Entered: 03/11/2026)
03/12/2026	1369 (6 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Hannah Book; 2) Final Order Allowing Compensation and Reimbursement of Expenses for Mills Halstead Zaloudek as Debtors Real Estate Counsel; and 3) Reorganized Debtors Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1360 Generic Order, 1362 Order on Application for Compensation, 1363 Motion to Extend Time) (Gershbein, Evan) (Entered: 03/12/2026)
03/13/2026	1370 (3 pgs)	Order Granting Reorganized Debtors' Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy), Signed on 3/13/2026 (Related document(s):1256 Objection to Claim) (gc4) (Entered: 03/13/2026)
03/16/2026	1371 (9 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Jhovanna Parker* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1366 Generic Order) (Gershbein, Evan) (Entered: 03/16/2026)
03/17/2026	1372 (2 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 03/17/2026)
03/17/2026	1373 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 03/17/2026)

03/17/2026	1374 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 03/17/2026)
03/18/2026	1375 (9 pgs)	Certificate *of Service re: Order Granting Reorganized Debtors Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1370 Generic Order) (Gershbein, Evan) (Entered: 03/18/2026)
03/19/2026	1376 (5 pgs)	Notice *Regarding Rejection of Executory Contracts with PRN Ambulance LLC and ProTransport-1 LLC*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan, 1206 Notice, 1328 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 03/19/2026)
03/20/2026	1377 (6 pgs)	Stipulation By ModivCare Inc. and Stacie Rogers. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/20/2026)
03/20/2026	1378 (6 pgs)	Stipulation By ModivCare Inc. and Shabana Hafiz. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/20/2026)
03/21/2026	1379 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Stacie Rogers, Signed on 3/21/2026 (Related document(s):1377 Stipulation) (gc4) (Entered: 03/23/2026)
03/21/2026	1380 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Shabana Hafiz, Signed on 3/21/2026 (Related document(s):1378 Stipulation) (gc4) (Entered: 03/23/2026)
03/24/2026	1381 (9 pgs)	Certificate *of Service re: Notice Regarding Rejection of Executory Contracts with PRN Ambulance LLC and ProTransport-1 LLC* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1376 Notice) (Gershbein, Evan) (Entered: 03/24/2026)
03/26/2026	1382 (6 pgs)	Stipulation By ModivCare Inc. and Joyce Carr. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1383 (28 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Third Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1384 (28 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Fourth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)

03/26/2026	1385 (28 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Fifth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1386 (28 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1387 (28 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Seventh Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1388 (19 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Eighth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1389 (13 pgs)	Response *to Notice Re: Rejection of Executory Contracts with PRN Ambulance LLC and Protransport-1 LLC*. Filed by PRN Ambulance, LLC, Protransport-1, LLC (Torrell, Gary) (Entered: 03/26/2026)
03/26/2026	1390 (10 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Stacie Rogers; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Shabana Hafiz* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1379 Generic Order, 1380 Generic Order) (Gershbein, Evan) (Entered: 03/26/2026)
03/27/2026	1391 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Joyce Carr, Signed on 3/27/2026 (Related document(s):1382 Stipulation) (gc4) (Entered: 03/27/2026)
03/30/2026	1392 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:59 AM to 9:01 AM. Appearances: See attached. ERO: Yes. Motion 1209 is terminated as moot for the reasons stated on the record. (Related document(s):1209 Motion to Compel) (gc4) (Entered: 03/30/2026)
03/30/2026	1393 (1 pg)	PDF with attached Audio File. Court Date & Time [03/30/2026 08:59:23 AM]. File Size [760 KB]. Run Time [00:01:31]. (admin). (Entered: 03/30/2026)
03/31/2026	1394 (4 pgs; 2 docs)	Certificate of No Objection *Regarding Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* (Filed By ModivCare Inc.).(Related document(s):1363 Motion to Extend Time) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1395 (29 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Ninth Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Harbour, Jason) (Entered: 03/31/2026)

03/31/2026	1396 (29 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Tenth Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1397 (29 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Eleventh Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1398 (27 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Twelfth Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1399 (7 pgs)	Third Notice *Regarding the Status of Various Cure Objections*. (Related document(s):1206 Notice, 1328 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 03/31/2026)
04/01/2026	1400 (2 pgs)	Order Granting Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims (Related Doc # 1363) Signed on 4/1/2026. (gc4) (Entered: 04/01/2026)
04/02/2026	1401 (6 pgs)	Stipulation By ModivCare Inc. and Jessica Buhler. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/02/2026)
04/02/2026	1402 (281 pgs)	Certificate *of Service re: Documents Served on or Before March 27, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1383 Objection to Claim, 1384 Objection to Claim, 1385 Objection to Claim, 1386 Objection to Claim, 1387 Objection to Claim, 1388 Objection to Claim) (Gershbein, Evan) (Entered: 04/02/2026)
04/02/2026	1403 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Joyce Carr* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1391 Generic Order) (Gershbein, Evan) (Entered: 04/02/2026)
04/02/2026	1404 (4 pgs)	Notice *of Status Conference to be Held on April 6, 2026 at 9:00 a.m. (CT)*. (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection) Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 04/02/2026)
04/02/2026	1405 (1 pg)	Response *of ZBS Logistics, LLC to Omnibus Claim Objection*. Filed by ZBS Logistics, LLC (bnb6) (Entered: 04/02/2026)
04/02/2026	1406 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 04/02/2026)

04/03/2026	1407 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Jessica Buhler, Signed on 4/3/2026 (Related document(s):1401 Stipulation) (gc4) (Entered: 04/03/2026)
04/02/2026	1408 (2 pgs)	Response (related document(s):1383 Objection to Claim). (bnb6) (Entered: 04/03/2026)
04/03/2026	1409 (74 pgs; 4 docs)	Opposition Motion to Compel *White & Case, LLP to Respond to Discovery Requests* Filed by Interested Party ModivCare Topco, LLC (Attachments: # 1 Exhibit A - Requests for Production # 2 Exhibit B - Objections to Request for Production # 3 Proposed Order) (Goott, Miriam) (Entered: 04/03/2026)
04/03/2026	1410 (99 pgs; 5 docs)	Reply / *White & Case LLP's Reply in Support of its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* (related document(s):1290 Application for Compensation). Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D) (Koster, Charles) (Entered: 04/03/2026)
04/03/2026	1411 (49 pgs; 4 docs)	Reply *of AlixPartners, LLP to Objection to its Final Fee Application* (related document(s):1288 Application for Compensation). Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Koster, Charles) (Entered: 04/03/2026)
04/03/2026	1412 (15 pgs; 2 docs)	Motion to Compel *MOTION OF CRESA, LLC TO ENFORCE THE FINAL FEE ORDER, COMPEL PAYMENT OF COURT-APPROVED FEES, AND FOR RELATED RELIEF* Filed by Other Prof. Cresa, LLC (Attachments: # 1 Proposed Order) (Rahn, Alexandria) (Entered: 04/03/2026)
04/06/2026	1413 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 AM to 9:28 AM. Appearances: Appearances: See attached. Additional appearances: Johnie Patterson and Miriam Goott for the Reorganized Debtors. ERO: Yes. The Court discussed bifurcating the motion and continued the hearing to 4/30/2026 at 4:00 PM. (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection) **Status conference to be held on 4/30/2026 at 04:00 PM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 04/06/2026)
04/06/2026	1414 (1 pg)	PDF with attached Audio File. Court Date & Time [04/06/2026 09:00:09 AM]. File Size [12914 KB]. Run Time [00:27:22]. (admin). (Entered: 04/06/2026)
04/06/2026	1415 (24 pgs; 3 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2) (Davidson, Timothy) (Entered: 04/06/2026)
04/06/2026	1416 (3 pgs)	Notice *of Virtual Hearing to Be Held on April 8, 2026, at 9:00 a.m. (Prevailing Central Time)*. (Related document(s):1257 Objection to Claim, 1367 Response) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 04/06/2026)
04/06/2026	1417 (195 pgs)	Certificate *of Service re Documents Served on March 31, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1395 Objection to Claim, 1396 Objection to Claim, 1397

		Objection to Claim, 1398 Objection to Claim) (Gershbein, Evan) (Entered: 04/06/2026)
04/06/2026	1418 (12 pgs)	Certificate *of Service re 1) Third Notice Regarding the Status of Various Cure Objections and 2) Order Granting Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1399 Notice, 1400 Order on Motion to Extend Time) (Gershbein, Evan) (Entered: 04/06/2026)
04/06/2026	1419 (8 pgs)	Certificate *of Service re 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Jessica Buhler; and 2) ModivCare Topco, LLC's Motion to Compel White & Case, LLP to Respond to Discovery Requests* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1407 Generic Order, 1409 Motion to Compel) (Gershbein, Evan) (Entered: 04/06/2026)
04/06/2026	1420 (9 pgs)	Certificate *of Service re 1) Reorganized Debtors' Witness and Exhibit List; and 2) Notice of Virtual Hearing to be Held on April 8, 2026, at 9:00 a.m. (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1415 Witness List, Exhibit List, 1416 Notice) (Gershbein, Evan) (Entered: 04/06/2026)
04/07/2026	1421 (17 pgs; 3 docs)	Agreed Order and Certificate of Counsel (Filed By ModivCare Inc.). (Related document(s):1257 Objection to Claim, 1367 Response) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 04/07/2026)
04/07/2026	1422 (2 pgs)	Notice *of Cancellation of Virtual Hearing to Be Held on April 8, 2026, at 9:00 a.m. (prevailing Central Time)*. (Related document(s):1257 Objection to Claim, 1367 Response, 1416 Notice, 1421 Agreed Order and Certificate of Counsel) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 04/07/2026)
04/07/2026	1423 (6 pgs)	Order Granting Reorganized Debtors' Second Omnibus Objection to Certain Proofs of Claim, Signed on 4/7/2026 (Related document(s):1257 Objection to Claim) (gc4) (Entered: 04/07/2026)
04/08/2026	1424 (2 pgs)	Withdraw Document (Filed By Salesforce, Inc.).(Related document(s):1278 Application for Administrative Expenses) (Chou, Emily) (Entered: 04/08/2026)
04/08/2026	1425 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by Charles R. Koster. This is to order a transcript of the April 6, 2026 Status Conference before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 04/10/2026. Estimated completion date: 04/13/2026. Modified on 4/10/2026 (amp4). (Entered: 04/08/2026)
04/08/2026	1426 (8 pgs)	Response to Ninth Omnibus Claim by Gurpreet Singh (dah4) (Entered: 04/08/2026)
04/09/2026	1427 (18 pgs; 2 docs)	Emergency Motion , Motion to Reconsider (related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1413 Courtroom Minutes). Filed by Interested

		Party ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 04/09/2026)
04/10/2026	1428 (6 pgs)	Stipulation By ModivCare Inc. and Debra Jones. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/10/2026)
04/10/2026	1429 (7 pgs; 2 docs)	Proposed Order RE: */ Notice of Filing Proposed Scheduling and Bifurcation Order* (Filed By Official Committee Of Unsecured Creditors). (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1410 Reply, 1411 Reply, 1427 Emergency Motion, Motion to Reconsider) (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 04/10/2026)
04/10/2026	1430 (6 pgs; 2 docs)	Proposed Order RE: */ Notice of Filing Proposed Order Requiring the Reorganized Debtors to Deposit Funds in Escrow with the Court* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1410 Reply, 1411 Reply, 1427 Emergency Motion, Motion to Reconsider) (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 04/10/2026)
04/12/2026	1431 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Debra Jones, Signed on 4/12/2026 (Related document(s):1428 Stipulation) (gc4) (Entered: 04/13/2026)
04/14/2026	1432 (8 pgs)	Certificate *of Service re: 1) Certificate of Counsel Regarding Reorganized Debtors Second Omnibus Objection to Certain Claims; 2) Notice of Cancellation of Virtual Hearing to be Held on April 8, 2026, at 9:00 a.m. (Prevailing Central Time); and 3) Order Granting Reorganized Debtors Second Omnibus Objection to Certain Proofs of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1421 Agreed Order and Certificate of Counsel, 1422 Notice, 1423 Generic Order) (Gershbein, Evan) (Entered: 04/14/2026)
04/14/2026	1433 (9 pgs)	Certificate *of Service re: ModivCare Topco, LLCs Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1427 Emergency Motion, Motion to Reconsider) (Gershbein, Evan) (Entered: 04/14/2026)
04/14/2026	1434 (2 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 04/14/2026)
04/15/2026	1435 (19 pgs)	Response *to Omnibus Claim Objection*. Filed by Lee Paige (bnb6) (Entered: 04/16/2026)
04/16/2026	1436 (1 pg)	Motion *for Leave to File Electronically.* Filed by Interested Party Mark P. Donaldson (dmm4) (Entered: 04/16/2026)
04/16/2026	1437 (6 pgs)	Objection *to Omnibus Objection re: Proof of Claim*. Filed by Mark P. Donaldson (dmm4) (Entered: 04/16/2026)

04/16/2026	1438 (22 pgs; 2 docs)	Transcript RE: Status Conference held on April 6, 2026 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 07/15/2026. (mhen) (Entered: 04/16/2026)
04/16/2026	1439 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Debra Jones* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1431 Generic Order) (Gershbein, Evan) (Entered: 04/16/2026)
04/17/2026	1440 (12 pgs)	Stipulation By ModivCare Inc. and the Chubb Companies. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/17/2026)
04/17/2026	1441 (7 pgs)	Stipulation By ModivCare Inc. and Daniel Benke, Surnoivea Bryant, Albert Dunn, Jr., Willa Richardson. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/17/2026)
04/17/2026	1442 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 04/17/2026)
04/18/2026	1443 (11 pgs)	Stipulation and Agreed Order Related to the Withdrawal of (I) the Proofs of Claim of the Chubb Companies and (II) the Claim Objection, Signed on 4/18/2026 (Related document(s):1440 Stipulation) (gc4) (Entered: 04/20/2026)
04/18/2026	1444 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Claimants in Certain Personal injury Matters Pending in the Court of Common Pleas of Orangenburg County, South Carolina, Signed on 4/18/2026 (Related document(s):1441 Stipulation) (gc4) (Entered: 04/20/2026)
04/21/2026	1445 (1 pg)	Withdrawal of Claim: 33 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1446 (1 pg)	Withdrawal of Claim: 34 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1447 (1 pg)	Withdrawal of Claim: 35 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1448 (1 pg)	Withdrawal of Claim: 36 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)

04/21/2026	1449 (1 pg)	Withdrawal of Claim: 37 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1450 (1 pg)	Withdrawal of Claim: 38 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1451 (1 pg)	Withdrawal of Claim: 39 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/23/2026	1452 (1 pg)	MOTION to Appear Pro Hac Vice for Armen M. Tashjian (Fee Paid: $100, receipt number A27125314) Filed by Creditor Shooshanik Charkhchian (Wang, Ronghua) (Entered: 04/23/2026)
04/23/2026	1453 (15 pgs)	Response (related document(s):1383 Objection to Claim). (Wang, Ronghua) (Entered: 04/23/2026)
04/23/2026	1454 (43 pgs)	Declaration re: -- *Declaration of Armen M. Tashjian in Support of Response of Shooshanik Charkhchian to Reorganized Debtors' Third Omnibus Objection to Certain Claims (Late-Filed Claims) as to Claim No. 1914* (Filed By Shooshanik Charkhchian).(Related document(s):1453 Response) (Wang, Ronghua) (Entered: 04/23/2026)
04/23/2026	1455 (10 pgs)	Response (Filed By Administrative Services Cooperative, Inc.).(Related document(s):1383 Objection to Claim) (Conley, Phillip) (Entered: 04/23/2026)
04/23/2026	1456 (8 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Related to the Withdrawal of (I) the Proofs of Claim of the Chubb Companies and (II) the Claim Objection; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Claimants in Certain Personal Injury Matters Pending in the Court of Common Pleas of Orangeburg County, South Carolina* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1443 Generic Order, 1444 Generic Order) (Gershbein, Evan) (Entered: 04/23/2026)
04/24/2026	1457 (1 pg)	Order Granting Motion for Armen M. Tashjian To Appear pro hac vice (Related Doc # 1452) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 4/24/2026. (gc4) (Entered: 04/24/2026)
04/24/2026	1458 (50 pgs; 3 docs)	Objection / *White & Case LLP's Objection to ModivCare TopCo, LLC's Motion to Compel* (related document(s):1409 Motion to Compel). Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B) (Koster, Charles) (Entered: 04/24/2026)
04/24/2026	1459 (4 pgs)	Stipulation By ModivCare Topco, LLC and Cresa, LLC. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Topco, LLC).(Related document(s):1412 Motion to Compel) (Patterson, Johnie) (Entered: 04/24/2026)
04/24/2026	1460 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1438 Transcript) No. of Notices: 113. Notice Date 04/24/2026. (Admin.) (Entered: 04/24/2026)

04/27/2026	1461 (4 pgs)	Stipulation and Agreed Order, Signed on 4/27/2026 (Related document(s):1412 Motion to Compel, 1459 Stipulation) (gc4) (Entered: 04/27/2026)
04/24/2026	1462 (2 pgs)	Response *to Reorganized Debtor's Eleventh Omnibus Claim Objection*. Filed by Jackson Parish Ambulance Service District (dmm4) (Entered: 04/27/2026)
04/27/2026	1463 (99 pgs; 2 docs)	Response . Filed by Maxine Randolph (Attachments: # 1 Exhibit) (dmm4) (Entered: 04/27/2026)
04/24/2026	1464 (3 pgs)	Response to Omnibus Objection to Claim (related document(s):1387 Objection to Claim). (abh4) (Entered: 04/28/2026)
04/27/2026	1465 (4 pgs)	*Response to Seventh Omnibus Claim Objection* by Claimant Waldron & Company. Waldron & Company. (Related document(s): 1387) (dah4)Modified on 6/2/2026 (tjl4). (Entered: 04/28/2026)
04/28/2026	1466 (8 pgs)	Objection */ White & Case LLP's Objection to ModivCare TopCo, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* (related document(s):1427 Emergency Motion, Motion to Reconsider). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 04/28/2026)
04/28/2026	1467 (2 pgs)	Proposed Order RE: *and Certificate of Service* (Filed By Maxine Randolph).(Related document(s):1463 Response) (var2) (Entered: 04/28/2026)
04/28/2026	1468 (5 pgs)	Response *to Reorganized Debtors Fourth Omnibus Claim Objection*. Filed by Eileen Garcia (dmm4) (Entered: 04/28/2026)
04/29/2026	1469 (6 pgs)	Stipulation By ModivCare Inc. and Tristen Brenner. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/29/2026)
04/29/2026	1470 (11 pgs; 2 docs)	Application for Administrative Expenses . Objections/Request for Hearing Due in 21 days. Filed by Creditors PRN Ambulance, LLC, Protransport-1, LLC (Attachments: # 1 Proposed Order) (Mayer, Simon) (Entered: 04/29/2026)
04/30/2026	1471 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1472 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1473 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1474 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 04/30/2026)

04/30/2026	1475 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1476 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1477 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1478 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1479 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1480 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1481 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1482 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1483 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1484 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1485 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1486 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1487 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1488 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1489 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 04/30/2026)

04/30/2026	1490 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1491 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1492 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1493 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1494 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1495 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Tristen Brenner, Signed on 4/30/2026 (Related document(s):1469 Stipulation) (gc4) (Entered: 04/30/2026)
04/30/2026	1496 (8 pgs)	Response (Relates to docket entry 1395) (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn)Modified on 5/1/2026 (abh4). (Entered: 04/30/2026)
04/30/2026	1497 (18 pgs)	Declaration re: *ISO of AlphaOne Response to Debtors' Ninth Omnibus Claim Objection* (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn) (Entered: 04/30/2026)
04/30/2026	1498 (2 pgs)	Proposed Order RE: *Overruling Reorganized Debtors' Ninth Omnibus Objection* (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn) (Entered: 04/30/2026)
04/30/2026	1499 (1 pg)	Certificate *of Service* (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn) (Entered: 04/30/2026)
04/30/2026	1500 (5 pgs)	Fourth Notice *Regarding the Status of Various Cure Objections*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan, 1206 Notice, 1328 Notice, 1399 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 04/30/2026)
04/30/2026	1501 (1 pg)	Courtroom Minutes. Time Hearing Held: 4:00 PM to 4:32 PM. Appearances: See attached. Additional appearances: Johnie Patterson and Miriam Goot for Topco. ERO: Yes. Hearing continued to 6/09/2026 at 10:00 AM. Any additional filings may be filed by 6/03/2026, with replies to be filed before 6/09/2026. (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1427 Emergency Motion, Motion to Reconsider) **Hearing scheduled for 6/9/2026 at 10:00 AM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 04/30/2026)
04/30/2026	1502 (2 pgs)	Order Requiring the Reorganized Debtors to Deposit Funds in Escrow with the Court, Signed on 4/30/2026 (Related document(s):1288

		Application for Compensation, 1290 Application for Compensation) (gc4) (Entered: 04/30/2026)
04/30/2026	1503 (1 pg)	PDF with attached Audio File. Court Date & Time [04/30/2026 04:00:56 PM]. File Size [14634 KB]. Run Time [00:31:00]. (admin). (Entered: 04/30/2026)
04/30/2026	1504 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1461 Generic Order) (Gershbein, Evan) (Entered: 04/30/2026)
04/30/2026	1505 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 04/30/2026)
05/01/2026	1506 (4 pgs; 2 docs)	Notice of Appeal filed. (related document(s):1502 Generic Order). Fee Amount $298. Appellant Designation due by 05/15/2026. (Attachments: # 1 Exhibit Order Appealed From) (Patterson, Johnie) (Entered: 05/01/2026)
05/01/2026	1507	Election to Appeal to District Court . (Patterson, Johnie) (Entered: 05/01/2026)
05/02/2026	1508 (20 pgs)	BNC Certificate of Mailing. (Related document(s):1502 Generic Order) No. of Notices: 116. Notice Date 05/02/2026. (Admin.) (Entered: 05/02/2026)
05/01/2026	1509 (43 pgs)	Response (related document(s):1397 Objection to Claim). (var2) (Entered: 05/04/2026)
05/04/2026	1510 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the April 30, 2026 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 5/4/26. Estimated completion date: 5/5/26. Modified on 5/4/2026 (anc4). (Entered: 05/04/2026)
05/05/2026	1511 (30 pgs; 2 docs)	Transcript RE: Status Conference held on April 30, 2026 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 08/3/2026. (mhen) (Entered: 05/05/2026)
05/05/2026	1512 (13 pgs; 3 docs)	Notice *of Filing Proposed Scheduling and Bifurcating Order*. (Related document(s):1354 Objection, 1410 Reply, 1427 Emergency Motion, Motion to Reconsider, 1466 Objection) Filed by Official Committee

		Of Unsecured Creditors (Attachments: # 1 Proposed Order # 2 Exhibit A - Redline) (Koster, Charles) (Entered: 05/05/2026)
05/05/2026	1513 (15 pgs)	Certificate *of Service re: Documents Served on April 30, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1471 Chapter 11 Post-Confirmation Report, 1472 Chapter 11 Post-Confirmation Report, 1473 Chapter 11 Post-Confirmation Report, 1474 Chapter 11 Post-Confirmation Report, 1475 Chapter 11 Post-Confirmation Report, 1476 Chapter 11 Post-Confirmation Report, 1477 Chapter 11 Post-Confirmation Report, 1478 Chapter 11 Post-Confirmation Report, 1479 Chapter 11 Post-Confirmation Report, 1480 Chapter 11 Post-Confirmation Report, 1481 Chapter 11 Post-Confirmation Report, 1482 Chapter 11 Post-Confirmation Report, 1483 Chapter 11 Post-Confirmation Report, 1484 Chapter 11 Post-Confirmation Report, 1485 Chapter 11 Post-Confirmation Report, 1486 Chapter 11 Post-Confirmation Report, 1487 Chapter 11 Post-Confirmation Report, 1488 Chapter 11 Post-Confirmation Report, 1489 Chapter 11 Post-Confirmation Report, 1490 Chapter 11 Post-Confirmation Report, 1491 Chapter 11 Post-Confirmation Report, 1492 Chapter 11 Post-Confirmation Report, 1493 Chapter 11 Post-Confirmation Report, 1494 Chapter 11 Post-Confirmation Report, 1495 Generic Order, 1500 Notice) (Gershbein, Evan) (Entered: 05/05/2026)
05/05/2026	1514 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 05/05/2026)
05/06/2026	1515 (11 pgs)	Response to ModivCare Inc., et al., (Reorganized Debor) and ModivCare Solutions LLC Objection Filing. (dlr1)Modified on 5/6/2026 (dlr1). (Entered: 05/06/2026)
05/06/2026	1516 (1 pg)	Clerk's Notice of Filing of an Appeal. On May 1, 2026, ModivCare Topco, LLC filed a notice of appeal. The appeal has been assigned to U.S. District Judge Nicholas J. Ganjei, Civil Action 4:26-cv-03651. Parties notified (Related document(s):1506 Notice of Appeal) (sat4) (Entered: 05/06/2026)
05/07/2026	1517 (10 pgs)	Letter from Barbara Elaine Neiswender regarding Claim. (var2) (Entered: 05/07/2026)
05/07/2026	1518 (14 pgs; 2 docs)	Emergency Motion , Motion To Stay Pending Appeal (related document(s):1502 Generic Order, 1506 Notice of Appeal). Filed by Interested Party ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 05/07/2026)
05/08/2026	1519 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1511 Transcript) No. of Notices: 116. Notice Date 05/08/2026. (Admin.) (Entered: 05/08/2026)
05/09/2026	1520 (3 pgs)	Scheduling and Bifurcation Order, Signed on 5/9/2026 (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1409 Motion to

		Compel, 1410 Reply, 1411 Reply, 1427 Emergency Motion, Motion to Reconsider, 1458 Objection, 1466 Objection) (gc4) (Entered: 05/11/2026)
05/11/2026	1521 (46 pgs; 5 docs)	Emergency Motion / *White & Case LLP's (I) Emergency Motion for Entry of an Order Finding ModivCare TopCo LLC in Civil Contempt, and (II) Objection to ModivCare TopCo, LLC's Emergency Motion for Stay Pending Appeal* Filed by Attorney White & Case LLP (Attachments: # 1 Proposed Order # 2 Exhibit 1 # 3 Exhibit 2 # 4 Exhibit 3) (Koster, Charles) (Entered: 05/11/2026)
05/12/2026	1522 (3 pgs)	Notice *of Withdrawal of Appearance and Request to Cease Service of Notices, Orders, Pleadings, and Documents*. Filed by Cresa, LLC (Boydston, Elizabeth) (Entered: 05/12/2026)
05/12/2026	1523 (4 pgs)	Notice *of Hybrid Hearing to be Held on May 20, 2026 at 8:30 a.m. (Prevailing Central Time)*. (Related document(s):1521 Emergency Motion) Filed by White & Case LLP (Koster, Charles) (Entered: 05/12/2026)
05/12/2026	1524 (9 pgs)	Certificate *of Service re: ModivCare Topco, LLCs Emergency Motion for Stay Pending Appeal* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1518 Emergency Motion, Motion To Stay Pending Appeal) (Gershbein, Evan) (Entered: 05/12/2026)
05/13/2026	1525 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 05/13/2026)
05/14/2026	1526 (6 pgs)	Stipulation By ModivCare Inc. and Howard Rogers. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 05/14/2026)
05/14/2026	1527 (2 pgs)	Statement of Issues on Appeal (related document(s):1506 Notice of Appeal). (Patterson, Johnie) (Entered: 05/14/2026)
05/14/2026	1528 (3 pgs)	Appellant Designation of Contents For Inclusion in Record On Appeal (related document(s):1506 Notice of Appeal). (Patterson, Johnie) (Entered: 05/14/2026)
05/15/2026	1529 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Howard Rogers, Signed on 5/15/2026 (Related document(s):1526 Stipulation) (gc4) (Entered: 05/15/2026)
05/18/2026	1530 (740 pgs; 11 docs)	Witness List, Exhibit List (Filed By ModivCare Topco, LLC).(Related document(s):1518 Emergency Motion, Motion To Stay Pending Appeal) (Attachments: # 1 Exhibit # 2 Exhibit # 3 Exhibit # 4 Exhibit # 5 Exhibit # 6 Exhibit # 7 Exhibit # 8 Exhibit # 9 Exhibit # 10 Exhibit) (Patterson, Johnie) (Entered: 05/18/2026)

05/18/2026	1531 (740 pgs; 11 docs)	Witness List, Exhibit List (Filed By ModivCare Topco, LLC).(Related document(s):1521 Emergency Motion) (Attachments: # 1 Exhibit # 2 Exhibit # 3 Exhibit # 4 Exhibit # 5 Exhibit # 6 Exhibit # 7 Exhibit # 8 Exhibit # 9 Exhibit # 10 Exhibit) (Patterson, Johnie) (Entered: 05/18/2026)
05/18/2026	1532 (19 pgs; 3 docs)	Response (related document(s):1521 Emergency Motion). Filed by ModivCare Topco, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B) (Patterson, Johnie) (Entered: 05/18/2026)
05/19/2026	1533 (4 pgs)	Witness List, Exhibit List (Filed By White & Case LLP). (Koster, Charles) (Entered: 05/19/2026)
05/19/2026	1534 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Howard Rogers* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1529 Generic Order) (Gershbein, Evan) (Entered: 05/19/2026)
05/19/2026	1535 (10 pgs)	Certificate *of Service re: 1) Witness and Exhibit List for May 20, 2026 re: ModivCare TopCo, LLCs Emergency Motion for Stay Pending Appeal; 2) Witness and Exhibit List for May 20, 2026 re: White & Case LLPs (I) Emergency Motion for Entry of an Order Finding ModivCare TopCo, LLC in Civil Contempt, and (II) Objection to ModivCare TopCo, LLCs Emergency Motion for Stay Pending Appeal; and 3) ModivCare TopCo, LLC's Response and Objection to White & Case LLP's Emergency Motion for Entry of an Order Finding ModivCare TopCo, LLC in Civil Contempt* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1530 Witness List, Exhibit List, 1531 Witness List, Exhibit List, 1532 Response) (Gershbein, Evan) (Entered: 05/19/2026)
05/20/2026	1536 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 9:03 AM. Appearances: See attached. Additional appearances: Charles Koster for the UCC, Johnie Patterson and Miriam Goot for Topco. Exhibits admitted: ECF 1530-1 through 10. ERO: Yes. Motion 1518 is taken under advisement as stated on the record. A show cause order will be entered setting an evidentiary hearing on Motion 1521. (Related document(s):1518 Emergency Motion, Motion To Stay Pending Appeal, 1521 Emergency Motion) (gc4) (Entered: 05/20/2026)
05/20/2026	1537 (1 pg)	PDF with attached Audio File. Court Date & Time [05/20/2026 08:31:24 AM]. File Size [14696 KB]. Run Time [00:31:03]. (admin). (Entered: 05/20/2026)
05/20/2026	1538 (1 pg)	Notice of Appearance and Request for Notice Filed by Ron Satija Filed by on behalf of Debra Jones (Satija, Ron) (Entered: 05/20/2026)
05/20/2026	1539 (18 pgs; 2 docs)	Objection *to ProTransport-1 and PRN Ambulance's Application for Allowance of Administrative Claim* (related document(s):1470 Application for Administrative Expenses). Filed by ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 05/20/2026)
05/22/2026	1540 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by Charles R. Koster. This is to order a transcript of May 20, 2026 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas

		(Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 5/22/2026. Estimated completion date: 5/25/2026. Modified on 5/22/2026 (sew4). (Entered: 05/22/2026)
05/22/2026	1541 (1 pg)	MOTION to Appear Pro Hac Vice for Joseph F. Pacelli (Fee Paid: $100, receipt number A27217022) Filed by Financial Advisor AlixPartners, LLP (Monsour, Trey) (Entered: 05/22/2026)
05/22/2026	1542 (1 pg)	MOTION to Appear Pro Hac Vice for Paul R. DeFillippo (Fee Paid: $100, receipt number A27217031) Filed by Financial Advisor AlixPartners, LLP (Monsour, Trey) (Entered: 05/22/2026)
05/22/2026	1543 (1 pg)	Order Granting Motion for Joseph F. Pacelli To Appear pro hac vice (Related Doc # 1541) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 5/22/2026. (gc4) (Entered: 05/22/2026)
05/22/2026	1544 (1 pg)	Order Granting Motion for Paul R. DeFilippo To Appear pro hac vice (Related Doc 1542) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 5/22/2026. (gc4) (Entered: 05/22/2026)
05/22/2026	1545 (7 pgs)	Emergency Motion *for Order Allowing Late-Filed Claim Due to Excusable Neglect* Filed by Creditor DLR Management Group, LLC (sew4) (Entered: 05/26/2026)
05/26/2026	1546 (11 pgs)	Stipulation By ModivCare Inc. and ACE American Insurance Company and ESIS, Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):1011 Generic Order) (Davidson, Timothy) (Entered: 05/26/2026)
05/26/2026	1547 (6 pgs)	Stipulation By ModivCare Inc. and Darlene Sherwood. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):1055 Order Confirming Chapter 11 Plan) (Davidson, Timothy) (Entered: 05/26/2026)
05/26/2026	1548 (7 pgs)	Stipulation By ModivCare Inc. and Daryl D. Stokes. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):1055 Order Confirming Chapter 11 Plan) (Davidson, Timothy) (Entered: 05/26/2026)
05/26/2026	1549 (9 pgs)	Certificate *of Service re: Objection to ProTransport-1 and PRN Ambulances Application for Allowance of Administrative Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1539 Objection) (Gershbein, Evan) (Entered: 05/26/2026)
05/27/2026	1550 (10 pgs)	Second Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors' Insurance Programs, Signed on 5/27/2026 (Related document(s):1011 Generic Order, 1546 Stipulation) (gc4) (Entered: 05/27/2026)

05/27/2026	1551 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Darlene Sherwood, Signed on 5/27/2026 (Related document(s):1055 Order Confirming Chapter 11 Plan, 1547 Stipulation) (gc4) (Entered: 05/27/2026)
05/27/2026	1552 (7 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Daryl D. Stokes, Signed on 5/27/2026 (Related document(s):1055 Order Confirming Chapter 11 Plan, 1548 Stipulation) (gc4) (Entered: 05/27/2026)
05/27/2026	1553 (1 pg)	Order Setting Hearing, Signed on 5/27/2026 (Related document(s):1545 Emergency Motion) **Hearing scheduled for 6/10/2026 at 04:30 PM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 05/27/2026)
05/27/2026	1554 (28 pgs; 2 docs)	Transcript RE: Emergency Motion Hearing held on May 20, 2026 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 08/25/2026. (mhen) (Entered: 05/27/2026)
05/27/2026	1555 (7 pgs)	Stipulation By ModivCare Inc. and Shooshanik Charkhchian. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 05/27/2026)
05/28/2026	1556 (7 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Shooshanik Charkhchian, Signed on 5/28/2026 (Related document(s):1555 Stipulation) (gc4) (Entered: 05/28/2026)
05/28/2026	1557 (7 pgs)	Appellee Designation of Contents for Inclusion in Record of Appeal (related document(s):1502 Generic Order, 1506 Notice of Appeal). (Koster, Charles) (Entered: 05/28/2026)
05/29/2026	1558 (5 pgs)	Fifth Notice *Regarding the Status of Various Cure Objections*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan, 1206 Notice, 1328 Notice, 1399 Notice, 1500 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 05/29/2026)
05/30/2026	1559 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1554 Transcript) No. of Notices: 117. Notice Date 05/30/2026. (Admin.) (Entered: 05/30/2026)
06/01/2026	1560 (8 pgs)	Certificate *of Service re: 1) Second Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors Insurance Programs; 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Darlene Sherwood; and 3) Stipulation and Agreed Order Granting Relief from Plan Injunction to Daryl D. Stokes* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1550 Generic Order, 1551 Generic Order, 1552 Generic Order) (Gershbein, Evan) (Entered: 06/01/2026)

06/02/2026	1561 (2 pgs)	Notice *of Hearing*. (Related document(s):1470 Application for Administrative Expenses) Filed by PRN Ambulance, LLC, Protransport-1, LLC (Mayer, Simon) (Entered: 06/02/2026)
06/02/2026	1562 (5 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Shooshanik Charkhchian* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1556 Generic Order) (Gershbein, Evan) (Entered: 06/02/2026)
06/02/2026	1563 (9 pgs)	Certificate *of Service re: Fifth Notice Regarding the Status of Various Cure Objections* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1558 Notice) (Gershbein, Evan) (Entered: 06/02/2026)
06/03/2026	1564 (411 pgs; 14 docs)	Objection (related document(s):1290 Application for Compensation, 1409 Motion to Compel, 1427 Emergency Motion, Motion to Reconsider). Filed by ModivCare Topco, LLC (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Complaint H # 9 Exhibit I # 10 Exhibit J # 11 Complaint K # 12 Exhibit L # 13 Proposed Order) (Goott, Miriam) (Entered: 06/03/2026)
06/03/2026	1565 (183 pgs; 4 docs)	Amended Objection (related document(s):1288 Application for Compensation, 1409 Motion to Compel, 1427 Emergency Motion, Motion to Reconsider, 1518 Emergency Motion, Motion To Stay Pending Appeal). Filed by ModivCare Topco, LLC (Attachments: # 1 Exhibit # 2 Exhibit # 3 Proposed Order) (Patterson, Johnie) (Entered: 06/03/2026)
06/04/2026	1566 (13 pgs; 3 docs)	Response (Filed By Straightway Transportation LLC).(Related document(s):605 Notice, 1398 Objection to Claim) (Attachments: # 1 Exhibit 1 # 2 Proposed Order) (Young-John, Megan) (Entered: 06/04/2026)
06/04/2026	1567 (1 pg)	MOTION to Appear Pro Hac Vice for Kaitlyn Sundt McClarren (Fee Paid: $100, receipt number A27258692) Filed by Financial Advisor AlixPartners, LLP (Koster, Charles) (Entered: 06/04/2026)
06/04/2026	1568 (1 pg)	MOTION to Appear Pro Hac Vice for Elizabeth S. Kardos (Fee Paid: $100, receipt number A27258709) Filed by Financial Advisor AlixPartners, LLP (Koster, Charles) (Entered: 06/04/2026)
06/04/2026	1569 (183 pgs; 4 docs)	Corrected Objection (related document(s):1288 Application for Compensation, 1409 Motion to Compel, 1427 Emergency Motion, Motion to Reconsider, 1518 Emergency Motion, Motion To Stay Pending Appeal). Filed by ModivCare Topco, LLC (Attachments: # 1 Exhibit # 2 Exhibit # 3 Proposed Order) (Patterson, Johnie) (Entered: 06/04/2026)
06/04/2026	1570 (1 pg)	Order Granting Motion for Kaitlyn Sundt McClarren To Appear pro hac vice (Related Doc # 1567) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 6/4/2026. (gc4) (Entered: 06/04/2026)

06/04/2026	1571 (1 pg)	Order Granting Motion for Elizabeth S. Kardos To Appear pro hac vice (Related Doc # 1568) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 6/4/2026. (gc4) (Entered: 06/04/2026)
06/04/2026	1572 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 06/04/2026)
06/05/2026	1573 (1300 pgs; 14 docs)	Witness List, Exhibit List (Filed By White & Case LLP). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13) (Koster, Charles) (Entered: 06/05/2026)
06/05/2026	1574 (3388 pgs; 2 docs)	Exhibit List, Witness List (Filed By AlixPartners, LLP). (Attachments: # 1 Exhibit (All exhibits)) (Monsour, Trey) (Entered: 06/05/2026)
06/05/2026	1575 (2087 pgs; 27 docs)	Witness List (Filed By ModivCare Topco, LLC).(Related document(s):1520 Generic Order) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18 # 19 Exhibit 19 # 20 Exhibit 20 # 21 Exhibit 21 # 22 Exhibit 22 # 23 Exhibit 23 # 24 Exhibit 24 # 25 Exhibit 25 # 26 Exhibit 26) (Goott, Miriam) (Entered: 06/05/2026)
06/05/2026	1576 (11 pgs)	Order to Show Cause, Signed on 6/5/2026 (Related document(s):1055 Order Confirming Chapter 11 Plan) (gc4) (Entered: 06/05/2026)
06/05/2026	1577 (22 pgs; 4 docs)	Emergency Motion *(Reorganized Debtors Emergency Motion to Strike, and in the Alternative Response in Opposition to Emergency Motion for Order Allowing Late-Filed Claim due to Excusable Neglect)* Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order) (Davidson, Timothy) (Entered: 06/05/2026)
06/08/2026	1578 (33 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Third Omnibus Objection to Certain Claims (Late-Filed Claims))* (Filed By ModivCare Inc.).(Related document(s):1383 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1579 (33 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Fourth Omnibus Objection to Certain Claims (Late-Filed Claims))* (Filed By ModivCare Inc.).(Related document(s):1384 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1580 (33 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Fifth Omnibus Objection to Certain Claims (Late-Filed Claims))* (Filed By ModivCare Inc.).(Related document(s):1385 Objection to

		Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1581 (32 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Sixth Omnibus Objection to Certain Claims (Late-Filed Claims))* (Filed By ModivCare Inc.).(Related document(s):1386 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1582 (33 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Seventh Omnibus Objection to Certain Claims (Late-Filed Claims))* (Filed By ModivCare Inc.).(Related document(s):1387 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1583 (14 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Eighth Omnibus Objection to Certain Claims (Late-Filed Claims))* (Filed By ModivCare Inc.).(Related document(s):1388 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1584 (35 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Ninth Omnibus Objection to Certain Claims (Satisfied Claims))* (Filed By ModivCare Inc.).(Related document(s):1395 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1585 (34 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Tenth Omnibus Objection to Certain Claims (Satisfied Claims))* (Filed By ModivCare Inc.).(Related document(s):1396 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1586 (33 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Eleventh Omnibus Objection to Certain Claims (Satisfied Claims))* (Filed By ModivCare Inc.).(Related document(s):1397 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1587 (31 pgs; 3 docs)	Certificate *(Certificate of Counsel Regarding Reorganized Debtors' Twelfth Omnibus Objection to Certain Claims (Satisfied Claims))* (Filed By ModivCare Inc.).(Related document(s):1398 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline Proposed Order) (Davidson, Timothy) (Entered: 06/08/2026)
06/08/2026	1588 (12 pgs; 2 docs)	Emergency Motion , Motion to Reconsider (related document(s):1576 Order to Show Cause). Filed by Interested Party ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 06/08/2026)
06/08/2026	1589 (10 pgs)	Certificate *of Service re: 1) Reorganized Debtors Amended Objection to the Final Fee Application Filed by White & Case, LLP; 2) Amended Objection to Final Fee Application Filed by AlixPartners, LLP; and 3) [Corrected] Amended Objection to Final Fee Application Filed by AlixPartners, LLP* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1564 Objection, 1565 Objection, 1569 Objection) (Gershbein, Evan) (Entered: 06/08/2026)

06/08/2026	1590 (1 pg)	Order on Motion for Electronic Filing Access (Related Doc # 1436) Signed on 6/8/2026. (tjl4) (Entered: 06/09/2026)
06/09/2026	1591 (3 pgs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 06/09/2026)
06/08/2026	1592 (14 pgs)	Order Granting Reorganized Debtors' Third Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1383 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1593 (14 pgs)	Order Granting Reorganized Debtors' Fourth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1384 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1594 (14 pgs)	Order Granting Reorganized Debtors' Fifth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1385 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1595 (14 pgs)	Order Granting Reorganized Debtors' Sixth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1386 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1596 (14 pgs)	Order Granting Reorganized Debtors' Seventh Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1387 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1597 (5 pgs)	Order Granting Reorganized Debtors' Eighth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1388 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1598 (15 pgs)	Order Granting Reorganized Debtors' Ninth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1395 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1599 (15 pgs)	Order Granting Reorganized Debtors' Tenth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1396 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1600 (13 pgs)	Order Granting Reorganized Debtors' Eleventh Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1397 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/08/2026	1601 (13 pgs)	Order Granting Reorganized Debtors' Twelfth Omnibus Objection to Certain Proofs of Claim, Signed on 6/8/2026 (Related document(s):1398 Objection to Claim) (gc4) (Entered: 06/09/2026)
06/09/2026	1602 (1 pg)	Order on ModivCare TopCo, LLC's Emergency Motion to Clarify and for Partial Reconsideration of the Order to Show Cause at ECF No. 1576, Signed on 6/9/2026 (Related document(s):1576 Order to Show Cause, 1588 Emergency Motion, Motion to Reconsider) (gc4) (Entered: 06/09/2026)
06/09/2026	1603 (9 pgs)	Certificate *of Service re: Reorganized Debtors' Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).

		(Related document(s):1591 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 06/09/2026)
06/10/2026	1604	Courtroom Minutes. Time Hearing Held: 4:30 PM to 4:40 PM. Appearances: Jason Harbour for the Reorganized Debtors, Irving De La Rosa Pro Se for DLR Management Group, LLC. ERO: Yes. An Order will be entered giving the Claimant until 7/10/2026 to retain counsel. (Related document(s):1545 Emergency Motion, 1577 Emergency Motion) (gc4) (Entered: 06/10/2026)
06/10/2026	1605 (1 pg)	Order Relating to the Reorganized Debtors' Emergency Motion to Strike and claimant's Emergency Motion for Order Allowing Late-Filed Claim Due to Excusable Neglect, Signed on 6/10/2026 (Related document(s):1545 Emergency Motion, 1577 Emergency Motion) (gc4) (Entered: 06/10/2026)
06/10/2026	1606 (1 pg)	PDF with attached Audio File. Court Date & Time [06/10/2026 04:30:02 PM]. File Size [4536 KB]. Run Time [00:09:35]. (admin). (Entered: 06/10/2026)
06/10/2026	1607 (9 pgs)	Certificate *of Service re: Reorganized Debtors Emergency Motion to Strike, and in the Alternative Response in Opposition to, Emergency Motion for Order Allowing Late-Filed Claim Due to Excusable Neglect* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1577 Emergency Motion) (Gershbein, Evan) (Entered: 06/10/2026)
06/11/2026	1608 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1602 Generic Order) No. of Notices: 117. Notice Date 06/11/2026. (Admin.) (Entered: 06/11/2026)
06/12/2026	1609 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1605 Generic Order) No. of Notices: 117. Notice Date 06/12/2026. (Admin.) (Entered: 06/12/2026)
06/15/2026	1610 (56 pgs)	Certificate *of Service re: Documents Served on June 9, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1592 Generic Order, 1593 Generic Order, 1594 Generic Order, 1595 Generic Order, 1596 Generic Order, 1597 Generic Order, 1598 Generic Order, 1599 Generic Order, 1600 Generic Order, 1601 Generic Order) (Gershbein, Evan) (Entered: 06/15/2026)
06/15/2026	1611 (9 pgs)	Certificate *of Service re: Order Relating to the Reorganized Debtors Emergency Motion to Strike and Claimants Emergency Motion for Order Allowing Late-Filed Claim Due to Excusable Neglect* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1605 Generic Order) (Gershbein, Evan) (Entered: 06/15/2026)
06/16/2026	1612 (11 pgs; 2 docs)	Motion to Extend Time *(Reorganized Debtors' Second Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims)* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 06/16/2026)
06/17/2026	1613 (2 pgs)	Notice *of Continued Hearing*. (Related document(s):1470 Application for Administrative Expenses) Filed by PRN Ambulance, LLC, Protransport-1, LLC (Mayer, Simon) (Entered: 06/17/2026)

08/20/2025		Receipt of Voluntary Petition (Chapter 11)(25-90309) [misc,volp11] (1738.00) Filing Fee. Receipt number A26416845. Fee amount $1738.00. (U.S. Treasury) (Entered: 08/20/2025)
08/21/2025		Notice of Appearance and Request for Notice Filed by Jana Smith Whitworth (Whitworth, Jana) (Entered: 08/21/2025)
09/12/2025		Hearing Continued by Request (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date)) Contacted by Brandon Bell. Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 9/30/2025 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 09/12/2025)
09/15/2025		*Notice of Time Change Only.* Hearing Times Reset by the Court (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date)) **Hearing scheduled for 9/30/2025 at 04:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 09/15/2025)
09/22/2025		Meeting of Creditors Held. Debtor appeared and participated by and through the designated representative, Chad J. Shandler. Hearing concluded on September 22, 2025. (Whitworth, Jana) (Entered: 09/22/2025)
09/22/2025		*Notice of Time Change Only.* Hearing Time Reset by Request (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date)) Contacted by Brandon Bell. Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 9/30/2025 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 09/22/2025)
10/06/2025		Hearing Set On (Related document(s):445 Amended Chapter 11 Plan) **Confirmation hearing to be held on 11/18/2025 at 08:00 AM at telephone and video conference.** (abh4) (Entered: 10/06/2025)
10/06/2025		Hearing Set by the Court (Related document(s):4 Emergency Motion (with hearing date)) **Status conference to be held on 10/6/2025 at 04:00 PM at telephone and video conference.** (tjl4) (Entered: 10/06/2025)
10/06/2025		*Notice of Cancellation of Hearing.* The status conference previously scheduled for 10/6/25 at 4:00 pm is *canceled*. (Related document(s): 4) (tjl4) (Entered: 10/06/2025)
10/08/2025		Receipt of Motion for Relief From Stay(25-90309) [motion,mrlfsty] (199.00) Filing Fee. Receipt number A26548784. Fee amount $ 199.00. (U.S. Treasury) (Entered: 10/08/2025)
10/08/2025		Hearing Set by Request (Related document(s):1 Voluntary Petition (Chapter 11)) Parties contacted the Case Manager. **Status conference to be held on 10/10/2025 at 08:30 AM at telephone and video conference only.** (tjl4) (Entered: 10/08/2025)
10/29/2025		Hearing Set On (Related document(s):440 Redacted Document In Advance of Sealed Paper) **Hearing scheduled for 10/30/2025 at 01:00 PM at**

		Houston, Courtroom 400 (ARP). (tjl4) (Entered: 10/29/2025)
11/13/2025		Hearing Continued by Agreement (Related document(s):471 Motion for Relief From Stay) Parties contacted the Case Manager. **Hearing scheduled for 12/4/2025 at 10:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/13/2025)
11/17/2025		Hearing Set by Request (Related document(s):445 Amended Chapter 11 Plan) Contacted by Catherin Rankin. Movant to notice all interested parties and file a certificate of service with the court. **Discovery Status Conference scheduled for 11/18/2025 at 08:00 AM at telephone and video conference only. Pretrial conference to be held on 11/21/2025 at 02:00 PM at telephone and video conference only.** (tjl4)Modified on 11/17/2025 (tjl4). (Entered: 11/17/2025)
11/17/2025		*Notice of Cancellation of Hearing.* The discovery status conference previously scheduled for 11/18/25 at 8:00 am is *canceled* by request. Contacted by Catherine Rankin. (tjl4) (Entered: 11/17/2025)
12/02/2025		Hearing Continued by Agreement (Related document(s):471 Motion for Relief From Stay) Parties contacted the Case Manager. **Hearing scheduled for 12/18/2025 at 11:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 12/02/2025)
12/02/2025		Hearing Set by Request (Related document(s):445 Amended Chapter 11 Plan) Contacted by Catherine Rankin. Movant to notice all interested parties and file a certificate of service with the court. **Status conference to be held on 12/3/2025 at 08:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 12/02/2025)
12/03/2025		Hearing Set On (Related document(s):728 Sealed Motion, 729 Sealed Document) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 12/8/2025 at 09:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 12/03/2025)
12/09/2025		Hearing Set On (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) **Hearing scheduled for 12/11/2025 at 02:00 PM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 12/09/2025)
12/23/2025		Hearing Set by Request (Related document(s):1055 Order Confirming Chapter 11 Plan) Contacted by Tad Davidson. Movant to notice all interested parties and file a certificate of service with the court. **Status conference to be held on 12/23/2025 at 10:30 AM at telephone and video conference.** (tjl4) (Entered: 12/23/2025)
01/05/2026		Hearing Set On (Related document(s):1002 Application for Administrative Expenses) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 1/20/2026 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 01/05/2026)
01/23/2026		Hearing Set On (Related document(s):1133 Generic Motion) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 1/28/2026 at 08:30 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 01/23/2026)

01/26/2026		Hearing Converted to Status Conference by Agreement (Related document(s):1133 Generic Motion) Parties contacted the Case Manager. **Status conference to be held on 1/28/2026 at 08:30 AM at telephone and video conference.** (tjl4) (Entered: 01/26/2026)
02/04/2026		Hearing Set by Request (Related document(s):1133 Generic Motion) Parties contacted the Case Manager. **Status conference to be held on 2/9/2026 at 08:30 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 02/04/2026)
03/09/2026		Adversary Case 4:26-ap-3035 Closed. (abh4) (Entered: 03/09/2026)
03/13/2026		Hearing Set On (Related document(s):1257 Objection to Claim) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 4/8/2026 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 03/13/2026)
04/02/2026		Hearing Set On (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection) Movant to notice all interested parties and file a certificate of service with the court. **Status conference to be held on 4/6/2026 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 04/02/2026)
04/10/2026		Hearing Set On (Related document(s):1427 Emergency Motion, Motion to Reconsider) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 4/30/2026 at 04:00 PM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 04/10/2026)
05/01/2026		Receipt of Notice of Appeal(25-90309) [appeal,ntcapl] (298.00) Filing Fee. Receipt number A27151923. Fee amount $ 298.00. (U.S. Treasury) (Entered: 05/01/2026)
05/11/2026		Hearing Set On (Related document(s):1518 Emergency Motion, Motion To Stay Pending Appeal) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 5/20/2026 at 08:30 AM at telephone and video conference.** (tjl4) (Entered: 05/11/2026)
05/12/2026		Hearing Set On (Related document(s):1521 Emergency Motion) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 5/20/2026 at 08:30 AM at telephone and video conference.** (tjl4) (Entered: 05/12/2026)
05/26/2026		Hearing Set On (Related document(s):1470 Application for Administrative Expenses) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 6/22/2026 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 05/26/2026)
06/08/2026		Hearing Set On (Related document(s):1577 Emergency Motion) **Hearing scheduled for 6/10/2026 at 04:30 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 06/08/2026)

06/09/2026		Hearing Set On (Related document(s):1576 Order to Show Cause, 1588 Emergency Motion, Motion to Reconsider) **Hearing scheduled for 7/8/2026 at 01:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 06/09/2026)
06/17/2026		Hearing Continued by Request (Related document(s):1470 Application for Administrative Expenses) Contacted by Simon Mayer. Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 7/15/2026 at 12:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 06/17/2026)

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)
Debtors. [1]	:	(Jointly Administered)

THE UNITED STATES TRUSTEE'S
NOTICE OF APPOINTMENT OF COMMITTEE OF UNSECURED CREDITORS

TO THE HONORABLE ALFREDO R. PÉREZ, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Kevin M. Epstein, the United States Trustee for Region 7 (Southern and Western Districts of Texas), pursuant to 11 U.S.C. § 1102(a)(1), hereby appoints the following eligible creditors to the Official Committee of Unsecured Creditors in this case:

Members	Counsel for Member
Wilmington Savings Fund Society, FSB As Indentured Trustee Patrick Healy 500 Delaware Avenue Wilmington, DE 19801 (302) 888-7420 phealy@wsfsbank.com	Jon Levine Winston & Strawn LLP 200 Park Avenue New York, NY 10166 (212) 294-4641 jonlevine@winston.com
Madison Avenue International LP Chris Carroll, CFO 150 East 58th Street, Suite 1403 New York, NY 10155 (212) 702-8648 eli@madisonavelp.com	N/A
Jupiter Asset Management David Rowe, Investment Analyst 70 Victoria Street London SW1E 6SQ	N/A

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

England +44 20 3817 1472 david.rowe@jupiteram.com	
Uber Health, LLC Niels Melius Randall Haimovici, Associate GC 1725 3rd Street San Francisco, CA 94158 (415) 612-8582 nielsm@uber.com	N/A
MedEx Medical Transport Service, Inc. Dillon Lowe 902 East Memorial Drive Ahoskie, NC 27910 (252) 287-7365 dillon@medextransport.com	Zachry McKay Jackson Walker LLP 1401 McKinney, Suite 1900 Houston, Texas 77010 (713) 752-4261 zmckay@jw.com
Randstad North America Ken Wilson, Manager, Business Services 3625 Cumberland Boulevard SE, Ste 600 Atlanta, GA 30339 (770) 937-7000 Ken.wilson@randstadusa.com	N/A
Marquis Hines C/O: Zev Antell Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, VA 23219 (804) 347-5740 zev@butlercurwood.com	Zev Antell Butler Curwood, PLC 140 Virginia Street, Suite 302 Richmond, VA 23219 (804) 347-5740 zev@butlercurwood.com

SIGNED on September 5, 2025.

Respectfully submitted,

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
REGION 7, SOUTHERN and WESTERN
DISTRICTS OF TEXAS
515 Rusk Avenue, Suite 3516
Houston, Texas 77002
(713) 718-4673 - Telephone
(713) 718-4670 - Fax

By: */s/ Jana Smith Whitworth*
Jana Smith Whitworth, Trial Attorney

SBOT No. 00797453/Fed. ID No. 20656
Email: Jana.Whitworth@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic means on all PACER participants on September 5, 2025.

/s/Jana Smith Whitworth
Jana Smith Whitworth

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)
Debtors.[1]	:	(Jointly Administered)

MOTION OF DEBTORS FOR ENTRY OF AN ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

ModivCare Inc. and its debtor affiliates in the above-captioned cases, as debtors and debtors in possession (collectively, the "***Debtors***"), respectfully state as follows in support of this motion (this "***Motion***"):

RELIEF REQUESTED

1. By this Motion, the Debtors hereby seek entry of an order, substantially in the form attached hereto (the "***Proposed Order***"), establishing procedures for providing (a) compensation and reimbursement of expenses to attorneys and other professionals whose retentions are approved

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

by this Court pursuant to sections 327 or 1103 of title 11 of the Bankruptcy Code (as defined below), and who will be required to file applications for allowance of compensation and reimbursement of expenses pursuant to sections 330 and 331 of the Bankruptcy Code; and (b) reimbursement of expenses to members of any official committees formed by the Office of the United States Trustee for the Southern District of Texas (the "***U.S. Trustee***") (excluding fees and expenses of any member's counsel).

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") has jurisdiction to consider this Motion under 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are sections 105(a), 330, and 331 of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the "***Bankruptcy Code***"), rule 2016 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "***Bankruptcy Local Rules***"), and Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

4. On August 20, 2025 (the "***Petition Date***"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. On September 5, 2025, the U.S. Trustee appointed an official committee of unsecured creditors [Docket No. 124] (the "***Committee***"). No request for the appointment of a trustee or an examiner has been made in the Chapter 11 Cases.

5. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules.

6. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First Day Relief* (the "***First Day Declaration***") [Docket No. 14].[2]

7. ModivCare is a technology-based healthcare services company that helps people (especially those in vulnerable situations) get the care and support they need. The Company works with government and private health insurance plans, as well as individuals, to provide: (a) transportation to and from medical appointments (non-emergency medical transportation totaling over 36 million rides per year); (b) in-home personal care (*e.g.*, helping with daily activities); (c) remote monitoring of patients' health from home; and (d) community health kiosks and wellness programs. ModivCare employs approximately 23,675 people and operates across 48 states and the District of Columbia, including Texas, with corporate offices in Denver, Colorado. ModivCare's goal is to make it easier for patients to get care, remove barriers that keep people from staying healthy, and improve overall health outcomes.

8. As described in the First Day Declaration, the Debtors are party to that certain Restructuring Support Agreement (the "***RSA***") with certain creditors who collectively hold approximately 90% of the First Lien Claims and approximately 70% of the Second Lien Claims. Pursuant to the RSA, the consenting creditors have agreed to provide $100 million in debtor-in-possession financing to fund the Chapter 11 Cases and support the comprehensive restructuring

[2] Capitalized terms used but not otherwise defined herein have the meaning assigned to them in the First Day Declaration.

transactions set forth in the term sheet attached to the RSA (the "***RSA Term Sheet***"). The RSA Term Sheet contemplates, among other things: (a) the equitization of approximately $871 million in First Lien Claims and approximately $316 million in Second Lien Claims; (b) the commitment of the consenting creditors to provide exit financing through the Exit Term Loan Facility; (c) the reorganized Debtors' entry into an exit revolving credit facility to support ongoing operations; and (d) the discharge of the Unsecured Notes Claims and General Unsecured Claims; with holders of such claims entitled to participate in an equity rights offering of up to $200 million, subject to the terms of the RSA. On September 4, 2025, the Debtors filed the *Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 119] (the "***Plan***") and corresponding disclosure statement [Docket No. 120] reflecting the terms of the RSA and RSA Term Sheet. In total, the transactions contemplated by the Plan and RSA Term Sheet are expected to reduce the Debtors' funded debt obligations by approximately $1.1 billion.

9. The Debtors have filed or intend to file applications to employ and retain professionals in the Chapter 11 Cases, including, but not limited to: (a) Latham & Watkins LLP, as bankruptcy co-counsel; (b) Hunton Andrews Kurth LLP, as bankruptcy co-counsel; (c) FTI Consulting, Inc., as financial advisor; (d) Moelis & Company LLC, as investment banker; and (e) Ernst & Young LLP, to provide accounting advisory, tax compliance, tax provision, and tax consulting services. The Debtors may in the future seek authority to retain additional professionals pursuant to section 327 of the Bankruptcy Code during the course of the Chapter 11 Cases.[3] Each

[3] The Debtors also have filed or intend to file a motion seeking authority to employ and pay certain professionals used in the ordinary course of business (each, an "***Ordinary Course Professional***"), rather than file a formal retention application for each such Ordinary Course Professional. For the avoidance of doubt, the Compensation Procedures (as defined below) shall not apply to the payment of compensation and reimbursement of expenses of the Ordinary Course Professionals.

entity retained pursuant to section 327 or 1103 of the Bankruptcy Code is referred to herein as a "***Professional***" and collectively, as the "***Professionals***."

10. The Debtors believe that establishing orderly procedures to pay the Professionals will streamline the administration of the Chapter 11 Cases and otherwise promote efficiency for the Court, the U.S. Trustee, and all parties in interest.

PROPOSED COMPENSATION AND REIMBURSEMENT PROCEDURES

11. To streamline the compensation process and enable the Court and all other parties in interest to more effectively monitor the fees and expenses incurred by the various Professionals for the rendering of services to the Debtors from the Petition Date through the effective date of the Debtors' chapter 11 plan of reorganization (the "***Effective Date***"), the Debtors request that the Court implement the following procedures (the "***Compensation Procedures***"):

a. On or after the fifth day of each month following the month for which compensation is sought, each Professional seeking interim allowance of its fees and expenses who (i) has been, or is hereafter, retained pursuant to sections 327 or 1103 of the Bankruptcy Code and (ii) is not retained as an Ordinary Course Professional, shall send a reasonably detailed monthly statement indicating the nature of the services rendered and expenses incurred (each, a "***Monthly Fee Statement***"), by e-mail, to the following parties (collectively, the "***Notice Parties***"):

   i. the Debtors, ModivCare Inc., 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237, Attn: Faisal Khan (Faisal.Khan@modivcare.com);

   ii. proposed co-counsel to the Debtors, Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020, Attn: Ray Schrock, Keith A. Simon, George Klidonas, and Jonathan Weichselbaum (ray.schrock@lw.com, keith.simon@lw.com, george.klidonas@lw.com, and jon.weichselbaum@lw.com);

   iii. proposed co-counsel to the Debtors, Hunton Andrews Kurth LLP, 600 Travis Street, Suite 4200, Houston, Texas 77002, Attn: Tad Davidson, and Brandon Bell (taddavidson@hunton.com, and bbell@hunton.com);

   iv. the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jana

Whitworth, Andrew Jimenez, and Alina Samko-Yu (janawhitworth@usdoj.gov, andrew.jimenez@usdoj.gov, and alina.samko-yu@usdoj.com);

v. counsel to the First Lien Agent and the Consenting Creditors, Paul Hastings LLP, 71 S. Wacker Drive, Forty-Fifth Floor, Chicago, IL 60606 (Attn: Kris Hansen, Matt Warren, and Lindsey Henrikson (krishansen@paulhastings.com, mattwarren@paulhastings.com, and lindseyhenrikson@paulhastings.com); and

vi. counsel to the Committee.

Any Professional that fails to submit a Monthly Fee Statement for a particular month or months may subsequently submit a consolidated Monthly Fee Statement that includes a request for compensation earned or expenses incurred during such previous month(s). All Monthly Fee Statements shall comply with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and applicable law. The first Monthly Fee Statement submitted by each Professional serving as of the Petition Date will cover the period from the Petition Date through and including September 30, 2025. Thereafter, each Monthly Fee Statement shall cover one calendar month (except to the extent that a Professional files a consolidated Monthly Fee Statement, as set forth above).

b. Each Notice Party will have until 4:00 p.m. (prevailing Central Time) on the day that is fourteen days after delivery of a Monthly Fee Statement (the "***Objection Deadline***") to object to the requested fees and expenses in accordance with the procedures described in subparagraph (c) below. Upon the expiration of the Objection Deadline, the Debtors shall promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Statement (the "***Actual Monthly Payment***") that are not subject to an objection pursuant to subparagraph (c) below.

c. If any Notice Party objects to a Professional's Monthly Fee Statement, such party must serve via e-mail on such Professional and each other Notice Party a written objection (an "***Objection***") so as to be received on or before the Objection Deadline. Any such Objection must identify with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses and the basis for such Objection. Thereafter, the objecting party and the affected Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution within fourteen days after delivery of the Objection or such later date as both parties agree (the "***Resolution Period***"), the objecting party shall file its Objection with the Court within 3 business days of the expiration of the Resolution Period and serve such Objection on the affected Professional and each of the other Notice Parties. Thereafter, the affected Professional may either (i) file a response to the Objection with the Court or (ii) forego payment of the amount subject to Objection until the next Interim Fee Application or Final Fee Application hearing, at which time the affected Professional may request that the Court consider

the Objection. For the avoidance of doubt, the applicable Professional may receive payment of any of the Actual Monthly Payment that is not subject to an Objection after the expiration of the Objection Deadline.

d. Beginning with the period ending November 30, 2025, and at three month intervals thereafter (each, an "***Interim Fee Period***"), each Professional shall file with the Court and serve on the Notice Parties an interim fee application (an "***Interim Fee Application***") for allowance of compensation and reimbursement of expenses sought in the Monthly Fee Statements submitted during such Interim Fee Period and prepared in accordance with the Compensation Procedures. Interim Fee Applications may be filed after the close of each Interim Fee Period. Interim Fee Applications must comply with sections 330 and 331 of the Bankruptcy Code, applicable provisions of the Bankruptcy Rules, Bankruptcy Local Rules, and any other applicable procedures and orders of the Court. The Notice Parties will have twenty-one days after service of an Interim Fee Application to object thereto. The first Interim Fee Application shall cover the Interim Fee Period from the Petition Date through and including November 30, 2025. Notwithstanding anything to the contrary in the Compensation Procedures, a Professional may file a combined Interim Fee Application with its fee application for final allowance of compensation and reimbursement of expenses (a "***Final Fee Application***" and, together with the Interim Fee Applications, the "***Applications***").

e. The Court, in its discretion, may approve an uncontested Interim Fee Application or Final Fee Application without the need for a hearing, upon the Professional's filing of a certificate of no objection or certificate of counsel. Upon allowance by the Court of a Professional's Interim Fee Application or Final Fee Application, the Debtors shall be authorized to promptly pay such Professional all requested fees (including the 20% holdback) and expenses not previously paid.

f. The pendency of an Objection to payment of compensation or reimbursement of expenses shall not disqualify a Professional from the future payment of compensation or reimbursement of expenses not previously paid pursuant to the Compensation Procedures, unless otherwise ordered by the Court.

12. The Debtors further request that each member of any official committee formed by the U.S. Trustee be permitted to submit statements of out-of-pocket expenses (excluding the fees and expenses of any member's counsel) and supporting vouchers to counsel for any such committee, and that counsel for such committee be required to collect such statements and vouchers and submit a request for reimbursement of the documented expenses in accordance with the foregoing Compensation Procedures.

13. The Debtors further request that the Court limit service of the Applications to the Notice Parties, and that all other parties that have filed a notice of appearance with the Clerk of the Court and requested notice of pleadings in the Chapter 11 Cases be entitled to receive only notice of hearings on the Applications (the "***Hearing Notices***"). Serving the Monthly Fee Statements and the Hearing Notices in this manner will permit the parties most active in the Chapter 11 Cases to review and object to the Professionals' fees while saving unnecessary duplication and mailing expenses.

BASIS FOR RELIEF

14. The implementation of the proposed Compensation Procedures is justified in these proceedings because the Chapter 11 Cases present a number of complex issues that, together with the day-to-day administration of these cases, must be addressed by the Debtors' staff and resources. In addition, it is anticipated that several Professionals will be involved in the Chapter 11 Cases. Absent streamlined compensation procedures, the fee application and review process could be exceptionally burdensome on the Debtors, the Professionals, the Court, and other parties in interest. By contrast, under the proposed Compensation Procedures, the mechanism for payment of Professionals' fees will be simplified and will avoid unnecessary Court involvement.

15. The right of the Professionals to seek interim payments from the Debtors' estates is governed by section 331 of the Bankruptcy Code, which provides, in relevant part, as follows:

> A trustee, an examiner, a debtor's attorney, or any professional person employed under section 327 or 1103 of this title may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of this title. After notice and a hearing, the court may allow and disburse to such applicant such compensation or reimbursement.

11 U.S.C. § 331. Absent an order of the court, section 331 of the Bankruptcy Code limits payment of fees and expenses to Professionals rendering services in the Chapter 11 Cases to only three times per year.

16. Congress's intent in enacting section 331 of the Bankruptcy Code is expressed unequivocally in the House and Senate Reports accompanying the enactment of the Bankruptcy Code:

> The court may permit more frequent applications if the circumstances warrant, such as in very large cases where the legal work is extensive and merits more frequent payments. The court is authorized to allow and order disbursement to the applicant of compensation and reimbursement that is otherwise allowable under section 330.

H.R. Rep. No. 595, 95th Cong., 1st Sess. 330 (1977); S. Rep. No. 989, 95th Cong., 2d Sess. 41-42 (1978).

17. Moreover, section 105(a) of the Bankruptcy Code provides, in relevant part, that "[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a). Thus, the Court has authority to enter an order authorizing procedures for interim payment of monthly compensation and reimbursement of expenses.

18. The proposed Compensation Procedures will enable the Debtors to closely monitor the costs of administering the Chapter 11 Cases, maintain a level cash flow, and implement efficient cash-management procedures. In addition, the Compensation Procedures will allow the Court and key parties in interest to ensure the reasonableness and necessity of the compensation and reimbursement sought pursuant to a streamlined and efficient process. The Debtors submit that more frequent payment applications than those prescribed in section 331 of the Bankruptcy

Code are merited in light of the size of the Chapter 11 Cases and the anticipated complexity of the Professionals' work in connection therewith.

19. In light of the foregoing, the Debtors submit that the relief requested herein is appropriate and in the best interest of the Debtors' estates, creditors, and all parties in interest and, therefore, should be granted.

NOTICE

20. Notice of this Motion will be given to the parties on the Debtors' Master Service List and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

21. A copy of this Motion is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare.

[*Remainder of page intentionally left blank.*]

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: September 18, 2025
Houston, Texas

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 18, 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

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)
Debtors.[1]	:	(Jointly Administered)

ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS
[Relates to Motion at Docket No. ____]

Upon the motion (the "***Motion***")[2] of the Debtors for entry of an order (this "***Order***") establishing procedures for interim compensation and reimbursement of expenses for professionals and official committee members, all as more fully set forth in the Motion; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary, except as set forth in the Motion with respect to entry of this Order; and upon the record herein; and after due deliberation thereon; and all objections, if any, to the

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Motion.

Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. All Professionals in the Chapter 11 Cases may seek compensation in accordance with the following procedures (collectively, the "***Compensation Procedures***"):

a. On or after the fifth day of each month following the month for which compensation is sought, each Professional seeking interim allowance of its fees and expenses who (i) has been, or is hereafter, retained pursuant to sections 327 or 1103 of the Bankruptcy Code and (ii) is not retained as an Ordinary Course Professional, shall send a reasonably detailed monthly statement indicating the nature of the services rendered and expenses incurred (each, a "***Monthly Fee Statement***"), by e-mail, to the following parties (collectively, the "***Notice Parties***"):

i. the Debtors, ModivCare Inc., 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237, Attn: Faisal Khan (Faisal.Khan@modivcare.com);

ii. proposed co-counsel to the Debtors, Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020, Attn: Ray Schrock, Keith A. Simon, George Klidonas, and Jonathan Weichselbaum (ray.schrock@lw.com, keith.simon@lw.com, george.klidonas@lw.com, and jon.weichselbaum@lw.com);

iii. proposed co-counsel to the Debtors, Hunton Andrews Kurth LLP, 600 Travis Street, Suite 4200, Houston, Texas 77002, Attn: Tad Davidson, and Brandon Bell (taddavidson@hunton.com, and bbell@hunton.com);

iv. the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jana Whitworth, Andrew Jimenez, and Alina Samko-Yu (janawhitworth@usdoj.gov, andrew.jimenez@usdoj.gov, and alina.samko-yu@usdoj.com);

v. counsel to the First Lien Agent and the Consenting Creditors, Paul Hastings LLP, 71 S. Wacker Drive, Forty-Fifth Floor, Chicago, IL 60606 (Attn: Kris Hansen, Matt Warren, and Lindsey Henrikson

(krishansen@paulhastings.com, mattwarren@paulhastings.com, and lindseyhenrikson@paulhastings.com); and

vi. counsel to the Committee.

Any Professional that fails to submit a Monthly Fee Statement for a particular month or months may subsequently submit a consolidated Monthly Fee Statement that includes a request for compensation earned or expenses incurred during such previous month(s). All Monthly Fee Statements shall comply with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and applicable law. The first Monthly Fee Statement submitted by each Professional serving as of the Petition Date will cover the period from the Petition Date through and including September 30, 2025. Thereafter, each Monthly Fee Statement shall cover one calendar month (except to the extent that a Professional files a consolidated Monthly Fee Statement, as set forth above).

b. Each Notice Party will have until 4:00 p.m. (prevailing Central Time) on the day that is fourteen days after delivery of a Monthly Fee Statement (the "***Objection Deadline***") to object to the requested fees and expenses in accordance with the procedures described in subparagraph (c) below. Upon the expiration of the Objection Deadline, the Debtors shall promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Statement (the "***Actual Monthly Payment***") that are not subject to an objection pursuant to subparagraph (c) below.

c. If any Notice Party objects to a Professional's Monthly Fee Statement, such party must serve via e-mail on such Professional and each other Notice Party a written objection (an "***Objection***") so as to be received on or before the Objection Deadline. Any such Objection must identify with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses, and the basis for such Objection. Thereafter, the objecting party and the affected Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution within fourteen days after delivery of the Objection or such later date as both parties agree (the "***Resolution Period***"), the objecting party shall file its Objection with the Court within 3 business days of the expiration of the Resolution Period and serve such Objection on the affected Professional and each of the other Notice Parties. Thereafter, the affected Professional may either (i) file a response to the Objection with the Court or (ii) forego payment of the amount subject to Objection until the next Interim Fee Application or Final Fee Application hearing, at which time the affected Professional may request that the Court consider the Objection. For the avoidance of doubt, the applicable Professional may receive payment of any of the Actual Monthly Payment that is not subject to Objection after the expiration of the Objection Deadline.

d. Beginning with the period ending November 30, 2025, and at three month intervals thereafter (each, an "***Interim Fee Period***"), each Professional shall file with the Court and serve on the Notice Parties an interim fee application (an "***Interim Fee***

Application") for allowance of compensation and reimbursement of expenses sought in the Monthly Fee Statements submitted during such Interim Fee Period and prepared in accordance with the Compensation Procedures. Interim Fee Applications may be filed after the close of each Interim Fee Period. Interim Fee Applications must comply with sections 330 and 331 of the Bankruptcy Code, applicable provisions of the Bankruptcy Rules, Bankruptcy Local Rules, and any other applicable procedures and orders of the Court. The Notice Parties will have twenty-one days after service of an Interim Fee Application to object thereto. The first Interim Fee Application shall cover the Interim Fee Period from the Petition Date through and including November 30, 2025. Notwithstanding anything to the contrary in the Compensation Procedures, a Professional may file a combined Interim Fee Application with its fee application for final allowance of compensation and reimbursement of expenses (a "***Final Fee Application***" and, together with the Interim Fee Applications, the "***Applications***").

e. The Court, in its discretion, may approve an uncontested Interim Fee Application or Final Fee Application without the need for a hearing, upon the Professional's filing of a certificate of no objection or certificate of counsel. Upon allowance by the Court of a Professional's Interim Fee Application, the Debtors shall be authorized to promptly pay such Professional all requested fees (including the 20% holdback) and expenses not previously paid.

f. The pendency of an Objection to payment of compensation or reimbursement of expenses shall not disqualify a Professional from the future payment of compensation or reimbursement of expenses not previously paid pursuant to the Compensation Procedures, unless otherwise ordered by the Court.

2. Neither (a) the payment of or the failure to pay, in whole or in part, a Monthly Fee Statement under the Compensation Procedures nor (b) the filing of or failure to file an Objection with the Court will bind any party in interest or the Court with respect to the final allowance of applications for compensation and reimbursement of expenses of Professionals. All fees and expenses paid to Professionals under the Compensation Procedures are subject to challenge and disgorgement until final allowance by the Court.

3. Each member of any official committee formed by the U.S. Trustee is permitted to submit statements of expenses incurred in the performance of the duties of the committee (excluding third-party counsel expenses of individual committee members) and supporting vouchers to the respective committee's counsel, which counsel shall collect and file the committee

members' requests for reimbursement with this Court in accordance with the Compensation Procedures.

4. The Professionals shall serve the Monthly Fee Statements only on the Notice Parties and shall file Applications with the Court. The Professionals shall serve Hearing Notices concerning Applications on all other parties that have filed a notice of appearance with the Clerk of the Court and requested notice of pleadings in the Chapter 11 Cases.

5. A Professional shall not seek payment in a Final Fee Application for any amounts that such Professional previously sought in a Monthly Fee Statement or Interim Fee Application if (a) such Professional voluntarily waived or reduced such amounts to resolve formal or informal objections or (b) such amounts were disallowed by order of the Court.

6. All notices given in accordance with the Compensation Procedures shall be deemed sufficient and adequate notice and in full compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

7. Notice of the Motion as provided therein shall be deemed good and sufficient notice and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

10. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: _____, 2025
Houston, Texas

_____
UNITED STATES BANKRUPTCY JUDGE

United States Bankruptcy Court
Southern District of Texas
ENTERED
October 06, 2025
Nathan Ochsner, Clerk

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)
Debtors.[1]	:	(Jointly Administered)

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, AND (E) GRANTING RELATED RELIEF
[Relates to Docket Nos. 4 & 106]

Upon the emergency motion, dated August 20, 2025 [Docket No. 4] (the "DIP Motion"), of ModivCare Inc. and the other debtors and debtors-in-possession (collectively, the "Debtors"), in the above-referenced chapter 11 cases (these "Chapter 11 Cases"), seeking entry of an interim order (the "Interim Order") and a final order (this "Final Order") pursuant to sections 105, 361, 362, 363, 364(c), 364(d), 364(e), 503, 507, and 552 of chapter 11 of title 11 of the United States Code (as amended, the "Bankruptcy Code"), Rules 2002, 4001, 6003, 6004, and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rules 2002-1, 4001-1(b), 4002-1, and 9013-1 of the Local Rules of the United States Bankruptcy Court for the Southern District

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

of Texas (the "Bankruptcy Local Rules"), and the *Procedures for Complex Cases in the Southern District of Texas* (the "Complex Case Procedures"), that, among other things:

(i) authorizes the Debtor designated as "Borrower" under, and as defined in, the DIP Credit Agreement (as defined below) (the "Borrower") to obtain, and the other guarantors (the "DIP Guarantors") under the DIP Loan Documents (as defined below) to unconditionally guaranty, jointly and severally, the Borrower's obligations in respect of, senior secured priming and superpriority postpetition financing, which would consist of a term loan facility for up to $100 million in principal amount (the "DIP Facility") and loans extended under the DIP Facility, (the "DIP Loans"), pursuant to the terms of (x) this Final Order, (y) that certain Superpriority Secured Debtor in Possession Credit Agreement (as the same may be amended, restated, supplemented, or otherwise modified from time to time in accordance with its terms, the "DIP Credit Agreement"),[2] by and among the Borrower, the DIP Guarantors, Wilmington Trust, as administrative agent and collateral agent (in such capacity, collectively, the "DIP Agent"), and the other financial institutions party to the DIP Credit Agreement as "Lenders" under, and as defined in, the DIP Credit Agreement (collectively, the "DIP Lenders," and together with the DIP Agent and any other party to which DIP Obligations (as defined below) are owed, the "DIP Secured Parties"), in substantially the form attached as Exhibit A of the Interim Order, and (z) any and all other Loan Documents (as defined in the DIP Credit Agreement, and together with the DIP Credit Agreement, collectively, the "DIP Loan Documents"), to: (A) fund, among other things, ongoing working capital, general corporate expenditures and other financing needs of the Debtors (including Allowed Professional Fees), (B) pay certain adequate protection amounts to the Prepetition First Lien Secured Parties (as defined below) as described below, (C) pay certain transaction fees and other costs and expenses of administration of the Chapter 11 Cases, and (D) pay fees and expenses (including reasonable attorneys' fees and expenses) and interest owed to the DIP Secured Parties under the DIP Loan Documents and this Final Order;

(ii) approves the terms of, and authorizes the Debtors to execute and deliver, and perform under, the DIP Loan Documents and authorizes and empowers the Debtors to perform such other and further acts as may be required in connection with the DIP Loan Documents and this Final Order;

(iii) grants (x) to the DIP Agent, for the benefit of itself and the other DIP Secured Parties, Liens on all of the DIP Collateral (as defined below) pursuant to sections 364(c)(2), 364(c)(3) and 364(d) of the Bankruptcy Code, which Liens shall be senior to the Primed Liens (as defined below) and shall be junior solely to the Carve-Out (as defined below) and any valid, enforceable and non-avoidable Liens that are (A) in existence on the Petition Date (as defined below), (B) either perfected

[2] Unless otherwise specified herein, all capitalized terms used herein without definition shall have the respective meanings given to such terms in the DIP Credit Agreement.

as of the Petition Date or perfected subsequent to the Petition Date solely to the extent permitted by section 546(b) of the Bankruptcy Code, and (C) senior in priority to the Prepetition First Liens (as defined below) and Prepetition Second Liens (as defined below) after giving effect to any intercreditor or subordination agreement (all such Liens, collectively, the "Prepetition Prior Liens") and (y) to the DIP Secured Parties, pursuant to section 364(c)(1) of the Bankruptcy Code, superpriority administrative claims (junior solely to the Carve-Out) having recourse to all prepetition and postpetition property of the Debtors' estates, now owned or hereafter acquired and the proceeds of each of the foregoing, including,[3] upon entry of the Interim Order, any proceeds of actions brought under section 549 of the Bankruptcy Code, and upon entry of this Final Order, the proceeds of Avoidance Actions (as defined below), and in all respects with respect to clauses (x) and (y) shall be subject to the relative priorities set forth on **Schedule 1** hereto;

(iv) authorizes the Debtors to use "cash collateral," as such term is defined in section 363(a) of the Bankruptcy Code (the "Cash Collateral"), including Cash Collateral in which the Prepetition First Lien Secured Parties (as defined below), the Prepetition Second Lien Secured Parties (as defined below) and/or the DIP Secured Parties have a Lien or other interest, in each case whether existing on the Petition Date, arising pursuant to this Final Order or otherwise;

(v) modifies the automatic stay imposed by section 362 of the Bankruptcy Code solely to the extent necessary to implement and effectuate the terms and provisions of the DIP Loan Documents and this Final Order;

(vi) authorizes the Borrower to borrow upon entry of this Final Order under the DIP Facility in an aggregate outstanding principal amount of $100 million in the aggregate ($37.5 million incremental from the amount approved in the Interim Order) which shall be funded into the DIP Account (as defined below) with release subject to the terms and conditions of the DIP Credit Agreement, and authorizes the DIP Guarantors to unconditionally guaranty such obligations jointly and severally;

(vii) grants the Prepetition First Lien Secured Parties, as of the Petition Date and in accordance with the relative priorities set forth herein, the Prepetition First Lien Adequate Protection (as defined below), which consists of, among other things, First Lien Adequate Protection Liens (as defined below), First Lien Adequate Protection Superpriority Claims (as defined below) and current payment of accrued and unpaid prepetition and postpetition reimbursable fees and expenses;

(viii) waives certain rights of the Debtors to surcharge collateral pursuant to section 506(c) of the Bankruptcy Code;

[3] As used herein, the words "including" or "include" and variations thereof shall not be deemed to be terms of limitation and shall be deemed to be followed by the words "without limitation."

(ix) provides for the immediate effectiveness of this Final Order and waives any applicable stay (including under Bankruptcy Rule 6004) to permit such immediate effectiveness; and

(x) grants related relief.

Having considered the DIP Motion, the DIP Credit Agreement, the *Declaration of Zul Jamal in Support of the Debtors' Motion to Obtain Postpetition Debtor-in-Possession Financing* (the "Jamal Declaration") and the *Declaration of Chad J. Sandler in Support of Debtors' Chapter 11 Petitions and First Day Relief* (the "First Day Declaration," and together with the Jamal Declaration, the "DIP Motion Declarations"), and the evidence submitted or proffered at the hearing on this Final Order (the "Final Hearing"); and in accordance with Bankruptcy Rules 2002, 4001(b), 4001(c), and 4001(d), and 9014 and all applicable Bankruptcy Local Rules, notice of the DIP Motion and the Final Hearing having been provided pursuant to Bankruptcy Rule 4001(b)(1)(C); an Interim Hearing having been held and concluded on August 21, 2025; a Final Hearing having been held on September 30, 2025 and October 3, 2025, and concluded on such date; and it appearing that approval of the relief requested in the DIP Motion is fair and reasonable and in the best interests of the Debtors, their creditors, their estates and all parties in interest, and is essential for the continued operation of the Debtors' businesses and the preservation of the value of the Debtors' assets; and it appearing that the Debtors' entry into the DIP Credit Agreement is a sound and prudent exercise of the Debtors' business judgment; and after due deliberation and consideration, and good and sufficient cause appearing therefor:

THIS COURT MAKES THE FOLLOWING FINDINGS OF FACT AND CONCLUSIONS OF LAW:[4]

A. **Petition Date**. On August 20, 2025 (the "Petition Date"), each of the

[4] Findings of fact shall be construed as conclusions of law, and conclusions of law shall be construed as findings of fact, as appropriate, pursuant to Bankruptcy Rule 7052.

Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of Texas, Houston Division (this "Court"). The Debtors have continued in the management and operation of their businesses and properties as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. On September 5, 2025, the United States Trustee for the Southern District of Texas (the "United States Trustee") appointed an official committee of unsecured creditors (the "Committee") [Docket No. 124]. No request for the appointment of a trustee or an examiner has been made in the Chapter 11 Cases.

B. **Jurisdiction and Venue**. This Court has jurisdiction over these Chapter 11 Cases, the DIP Motion and the parties and property affected hereby pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue for these Chapter 11 Cases and proceedings on the DIP Motion is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory and other predicates for the relief sought herein are sections 105, 361, 362, 363, 364, 507 and 552 of the Bankruptcy Code, Bankruptcy Rules 2002, 4001, 6004, and 9014 and the Bankruptcy Local Rules.

C. **Notice**. The Final Hearing is being held pursuant to the authorization of Bankruptcy Rule 4001. Notice of the Final Hearing has been provided by the Debtors, whether by facsimile, electronic mail, overnight courier or hand delivery, to certain parties in interest, including: (i) the United States Trustee, (ii) those entities or individuals included on the Debtors' list of thirty (30) largest unsecured creditors on a consolidated basis, (iii) counsel to the Prepetition First Lien Agent (as defined below), (iv) the Prepetition First Lien Agent, (iv) counsel to the Prepetition Second Lien Trustee (as defined below), (v) the Prepetition Second Lien Trustee, (vi) the DIP Agent, (vii) counsel to the DIP Agent, (viii) all other known lienholders, (ix) the United

States Attorney for the Southern District of Texas; (x) the Internal Revenue Service; (xi) the Securities and Exchange Commission; and (xii) the state attorneys general for states in which the Debtors conduct business**.** Under the circumstances, such notice of the DIP Motion, the relief requested therein, and the Final Hearing complies with Bankruptcy Rule 4001(b), (c) and (d) and the Bankruptcy Local Rules, and no other or further notice need be provided for entry of this Final Order.

D. **The Prepetition First Lien Facility**. The Prepetition First Lien Secured Parties (as defined below) have asserted, and the Debtors, pending the conclusion of the investigation (the "Independent Investigation") being undertaken by Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn") and notwithstanding anything in the Interim Order to the contrary, believe as of the date hereof, as follows:

(i) Prepetition First Lien Facility. Pursuant to that certain Credit Agreement, dated as of February 3, 2022 (as amended, restated or otherwise modified from time to time, the "Prepetition First Lien Credit Agreement," and collectively with any other agreements and documents executed or delivered in connection therewith, including the "Loan Documents" as defined therein, each as may be amended, restated, supplemented, or otherwise modified from time to time, the "Prepetition First Lien Loan Documents"), among (a) ModivCare Inc., as borrower, and the other Debtors that are Subsidiary Guarantors (as defined in the Prepetition First Lien Credit Agreement), (b) the other financial institutions party thereto as "Lenders" (collectively, the "Prepetition First Lien Lenders"), and (c) JPMorgan Chase Bank, N.A. and any successor in interest thereto, as administrative agent and collateral agent (in such capacities, the "Prepetition First Lien Agent" and, together with the Prepetition First Lien Lenders and any other party to which Prepetition First Lien Obligations are owed, the "Prepetition First Lien Secured

Parties"), the Prepetition First Lien Secured Parties agreed to extend loans and other financial accommodations to, and issue letters of credit for the account of, the Borrower pursuant to the Prepetition First Lien Loan Documents. All obligations of the Debtors arising under the Prepetition First Lien Credit Agreement (including the "Obligations" as defined therein, whether or not arising under the Prepetition First Lien Loan Documents) or the other Prepetition First Lien Loan Documents shall collectively be referred to herein as the "Prepetition First Lien Obligations."

(ii) Prepetition First Liens and Prepetition First Lien Collateral. Pursuant to the Collateral Documents (as defined in the Prepetition First Lien Credit Agreement) (as such documents were amended, restated, supplemented, or otherwise modified from time to time, the "Prepetition First Lien Collateral Documents"), by and among each of the Subsidiary Guarantors party thereto (the "Grantors") and the Prepetition First Lien Agent, each Grantor granted to the Prepetition First Lien Agent, for the benefit of itself and the other Prepetition First Lien Secured Parties, to secure the Prepetition First Lien Obligations, a first priority security interest in and continuing Lien (the "Prepetition First Liens") on substantially all of such Grantor's assets and properties (which, for the avoidance of doubt, includes Cash Collateral) and all proceeds, products, accessions, rents, and profits thereof, in each case whether then owned or existing or thereafter acquired or arising. All "Collateral" as defined in the Prepetition First Lien Credit Agreement granted or pledged by such Grantors pursuant to any Prepetition First Lien Collateral Document or any other Prepetition First Lien Loan Document shall collectively be referred to herein as the "Prepetition First Lien Collateral." As of the Petition Date, (I) the Prepetition First Liens (a) are legal, valid, binding, enforceable, and perfected Liens, (b) were granted to, or for the benefit of, the Prepetition First Lien Secured Parties for fair consideration and reasonably equivalent value, (c) are not subject to avoidance, recharacterization, or subordination pursuant to the Bankruptcy

Code or applicable non-bankruptcy law (except for the priming contemplated herein), and (d) are subject and subordinate only to (A) the DIP Liens (as defined below), (B) the Carve-Out (as defined below), and (C) the Prepetition Prior Liens, and (II) (w) the Prepetition First Lien Obligations constitute legal, valid, and binding obligations of the applicable Debtors, enforceable in accordance with the terms of the applicable Prepetition First Lien Loan Documents (other than in respect of the stay of enforcement arising from section 362 of the Bankruptcy Code), (x) no setoffs, recoupments, offsets, defenses, or counterclaims to any of the Prepetition First Lien Obligations exist, (y) no portion of the Prepetition First Lien Obligations or any payments made to any or all of the Prepetition First Lien Secured Parties are subject to avoidance, disallowance, disgorgement, recharacterization, recovery, subordination, attack, offset, counterclaim, defense, or "claim" (as defined in section 101(5) of the Bankruptcy Code) of any kind pursuant to the Bankruptcy Code or applicable non-bankruptcy law, and (z) each of the Guarantees (as defined in the Prepetition First Lien Credit Agreement) shall continue in full force and effect to unconditionally guaranty the Prepetition First Lien Obligations notwithstanding any use of Cash Collateral permitted hereunder or any financing and financial accommodations extended by the DIP Secured Parties to the Debtors pursuant to the terms of this Final Order or the DIP Loan Documents.

(iii) Amounts Owed under Prepetition First Lien Loan Documents. As of the Petition Date, the applicable Debtors owed the Prepetition First Lien Secured Parties, pursuant to the Prepetition First Lien Loan Documents, without defense, counterclaim, reduction or offset of any kind, in respect of loans made, letters of credit issued and other financial accommodations made by the Prepetition First Lien Secured Parties, (x) an aggregate principal amount of not less than $78,750,000 with respect to the Incremental Term Loans (as defined in the Prepetition First

Lien Credit Agreement) (y) an aggregate principal amount of not less than $270,699,086 with respect to the Revolving Facility (as defined in the Prepetition First Lien Credit Agreement), but excluding outstanding letters of credit, and (z) and an aggregate principal amount of not less than $522,239,937 with respect to the Term Loan Facility (as defined in the Prepetition First Lien Credit Agreement), *plus* all accrued and hereafter accruing and unpaid interest thereon and any additional fees, expenses (including any reasonable attorneys', accountants', appraisers', and financial advisors' fees and expenses that are chargeable or reimbursable under the Prepetition First Lien Loan Documents), and other amounts now or hereafter due under the Prepetition First Lien Loan Documents.

E. **The Prepetition Second Lien Facility**. The Prepetition Second Lien Secured Parties (as defined below) have asserted, and the Debtors, pending the conclusion of the Independent Investigation and notwithstanding anything in the Interim Order to the contrary, believe as of the date hereof, as follows:

(i) Prepetition Second Lien Facility. Pursuant to that certain Second Lien Senior Secured PIK Toggle Notes Indenture, dated as of March 7, 2025 (as amended, restated or otherwise modified from time to time, the "Prepetition Second Lien Indenture," and collectively with any other agreements and documents executed or delivered in connection therewith, including the "Loan Documents" as defined therein, each as may be amended, restated, supplemented, or otherwise modified from time to time, the "Prepetition Second Lien Loan Documents" together with the Prepetition First Lien Loan Documents, the "Prepetition Loan Documents"), among (a) ModivCare Inc., as issuer, and the other Debtors that are guarantors, (b) the Holders of Notes (as defined in the Prepetition Second Lien Indenture) issued in connection therewith (collectively, the "Prepetition Second Lien Noteholders"), and (c) Ankura Trust Company, LLC, as notes collateral

agent (in such capacity, the "Prepetition Second Lien Trustee" and, together with the Prepetition Second Lien Noteholders and any other party to which Prepetition Second Lien Obligations are owed, the "Prepetition Second Lien Secured Parties"), the Prepetition Second Lien Secured Parties agreed to extend financial accommodations to the Borrower pursuant to the Prepetition Second Lien Loan Documents. All obligations of the Debtors arising under the Prepetition Second Lien Indenture (including the "Obligations" as defined therein, whether or not arising under the Prepetition Second Lien Loan Documents) or the other Prepetition Second Lien Loan Documents shall collectively be referred to herein as the "Prepetition Second Lien Obligations."

(ii) Prepetition Second Liens and Prepetition Second Lien Collateral. Pursuant to the Security Documents (as defined in the Prepetition Second Lien Indenture) (as such documents were amended, restated, supplemented, or otherwise modified from time to time, the "Prepetition Second Lien Collateral Documents"), by and among each of the Grantors and the Prepetition Second Lien Trustee, each Grantor granted to the Prepetition Second Lien Trustee, for the benefit of itself and the other Prepetition Second Lien Secured Parties, to secure the Prepetition Second Lien Obligations, a second priority security interest in and continuing Lien (the "Prepetition Second Liens") on substantially all of such Grantor's assets and properties (which, for the avoidance of doubt, includes Cash Collateral) and all proceeds, products, accessions, rents, and profits thereof, in each case whether then owned or existing or thereafter acquired or arising. All "Collateral" as defined in the Prepetition Second Lien Indenture granted or pledged by such Grantors pursuant to any Prepetition Second Lien Collateral Document or any other Prepetition Second Lien Loan Document shall collectively be referred to herein as the "Prepetition Second Lien Collateral." As of the Petition Date, (I) the Prepetition Second Liens (a) are legal, valid, binding, enforceable, and perfected Liens, (b) were granted to, or for the benefit of, the Prepetition

Second Lien Secured Parties for fair consideration and reasonably equivalent value, (c) are not subject to avoidance, recharacterization, or subordination pursuant to the Bankruptcy Code or applicable non-bankruptcy law (except for the priming contemplated herein), and (d) are subject and subordinate only to (A) the DIP Liens (as defined below), (B) the Prepetition First Liens, (C) the Carve-Out (as defined below), and (D) the Prepetition Prior Liens, and (II) (w) the Prepetition Second Lien Obligations constitute legal, valid, and binding obligations of the applicable Debtors, enforceable in accordance with the terms of the applicable Prepetition Second Lien Loan Documents (other than in respect of the stay of enforcement arising from section 362 of the Bankruptcy Code), (x) no setoffs, recoupments, offsets, defenses, or counterclaims to any of the Prepetition Second Lien Obligations exist, (y) no portion of the Prepetition Second Lien Obligations or any payments made to any or all of the Prepetition Second Lien Secured Parties are subject to avoidance, disallowance, disgorgement, recharacterization, recovery, subordination, attack, offset, counterclaim, defense, or "claim" (as defined in section 101(5) of the Bankruptcy Code) of any kind pursuant to the Bankruptcy Code or applicable non-bankruptcy law, and (z) each of the Subsidiary Guarantees (as defined in the Prepetition Second Lien Indenture) shall continue in full force and effect to unconditionally guaranty the Prepetition Second Lien Obligations notwithstanding any use of Cash Collateral permitted hereunder or any financing and financial accommodations extended by the DIP Secured Parties to the Debtors pursuant to the terms of this Final Order or the DIP Loan Documents.

(iii) Amounts Owed under Prepetition Second Lien Loan Documents. As of the Petition Date, the applicable Debtors owed the Prepetition Second Lien Secured Parties, pursuant to the Prepetition Second Lien Loan Documents, without defense, counterclaim, reduction or offset of any kind, in respect of loans made, letters of credit issued and other financial accommodations

made by the Prepetition Second Lien Secured Parties, an aggregate principal amount of not less than $316,233,250 with respect to the Notes Obligations (as defined in the Prepetition Second Lien Indenture), *plus* all accrued and hereafter accruing and unpaid interest thereon and any additional fees, expenses (including any reasonable attorneys', accountants', appraisers', and financial advisors' fees and expenses that are chargeable or reimbursable under the Prepetition Second Lien Loan Documents), and other amounts now or hereafter due under the Prepetition Second Lien Loan Documents.

F. Cash Collateral. The Prepetition First Lien Secured Parties and Prepetition Second Lien Secured Parties have asserted, and the Debtors, pending the conclusion of the Independent Investigation and notwithstanding anything in the Interim Order to the contrary, believe as of the date hereof that all of the Debtors' cash, including any cash in deposit accounts of the Debtors, wherever located, constitutes Cash Collateral of the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties.

G. Intercreditor Agreement. The Intercreditor Agreement, dated as of March 7, 2025 (as amended, restated, supplemented, or otherwise modified in accordance with its terms, the "Intercreditor Agreement"), sets forth subordination and other provisions governing the relative priorities and rights of the Prepetition First Lien Secured Parties and their respective Prepetition First Lien Obligations and Prepetition First Liens, on the one hand, and the Prepetition Second Lien Secured Parties and their respective Prepetition Second Lien Obligations and Prepetition Second Liens, on the other hand. Pursuant to section 510 of the Bankruptcy Code, such Intercreditor Agreement and any other intercreditor agreement or subordination agreement between and/or among the Prepetition First Lien Agent, the Prepetition Second Lien Trustee, any Prepetition First Lien Lender, any Prepetition Second Lien Noteholder, any Debtor or affiliate

thereof, and any other applicable intercreditor or subordination provisions contained in any credit agreement, security agreement, indenture or related document, (i) shall remain in full force and effect, (ii) shall continue to govern the relative priorities, rights and remedies of the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties (including the relative priorities, rights and remedies of such parties with respect to the replacement liens and administrative expense claims and superpriority administrative expense claims granted, or amounts payable, by the Debtors under this Final Order or otherwise and the modification of the automatic stay), and (iii) shall not be amended, altered or modified by the terms of this Final Order or the DIP Loan Documents, and for avoidance of doubt, any acts or omissions by any Prepetition Second Lien Secured Party in connection with any chapter 11 plan of reorganization or liquidation in these Chapter 11 Cases (whether confirmed under section 1129(a) or (b) of the Bankruptcy Code), and any distributions on account of, or other treatment of, any Prepetition Second Lien Obligations pursuant to any such plan, shall remain subject to the Intercreditor Agreement (including its turnover provisions) or any other applicable intercreditor or subordination provisions.

H. **Findings Regarding the DIP Facility**.

(i) Need for Postpetition Financing. The Debtors have an immediate need to obtain the DIP Facility and use Cash Collateral to, among other things, permit the orderly continuation of the operation of their businesses, to maintain business relationships with vendors, suppliers, and customers, to make payroll, to make capital expenditures, to satisfy other working capital and operational needs, and to otherwise preserve the value of the Debtors' estates. The Debtors' access to sufficient working capital and liquidity through the use of Cash Collateral and borrowing under the DIP Facility is vital to a successful reorganization and/or to otherwise

preserve the enterprise value of the Debtors' estates.

(ii) No Credit Available on More Favorable Terms. The Debtors have been and continue to be unable to obtain financing on more favorable terms from sources other than the DIP Secured Parties under the DIP Loan Documents and this Final Order. The Debtors are unable to obtain unsecured credit allowable under section 503(b)(1) of the Bankruptcy Code as an administrative expense or secured credit allowable only under sections 364(c)(1), 364(c)(2), or 364(c)(3) of the Bankruptcy Code. The Debtors are unable to obtain secured credit under section 364(d)(1) of the Bankruptcy Code without (a) granting to the DIP Secured Parties the rights, remedies, privileges, benefits, and protections provided herein and in the DIP Loan Documents, including the DIP Liens and the DIP Superpriority Claims (as defined below), (b) allowing the DIP Secured Parties to provide the loans, letters of credit, and other financial accommodations under the DIP Facility on the terms set forth herein and in the DIP Loan Documents, (c) granting to the Prepetition First Lien Secured Parties the rights, remedies, privileges, benefits, and protections provided herein and in the DIP Loan Documents, including the Prepetition First Lien Adequate Protection, and (d) granting to the Prepetition Second Lien Secured Parties the rights, remedies, privileges, benefits, and protections provided herein and in the DIP Loan Documents, including the Prepetition Second Lien Adequate Protection (all of the foregoing described in clauses (a), (b), (c) and (d) above, collectively, the "DIP Protections").

I. **Reserved**.

J. **Adequate Protection for Prepetition Secured Parties**. The Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties have agreed to permit the Debtors to use the Prepetition First Lien Collateral and Prepetition Second Lien Collateral, respectively, including the Cash Collateral, subject to the terms and conditions set forth herein,

including the protections afforded a party acting in "good faith" under section 364(e) of the Bankruptcy Code. In addition, the DIP Facility contemplated hereby provides for a priming of the Prepetition First Liens and the Prepetition Second Liens pursuant to section 364(d) of the Bankruptcy Code. The Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties are entitled to the adequate protection as set forth herein pursuant to sections 361, 362, 363, and 364 of the Bankruptcy Code. Based on the DIP Motion and on the record presented to this Court at the Final Hearing, the terms of the proposed adequate protection arrangements, use of the Cash Collateral, and the DIP Facility contemplated hereby are fair and reasonable, reflect the Debtors' prudent exercise of business judgment consistent with their fiduciary duties, and constitute reasonably equivalent value and fair consideration for the consent of the Prepetition First Lien Secured Parties. Prepetition First Lien Lenders holding more than 50% of the aggregate principal balance of the Loans (as defined in the Prepetition First Lien Credit Agreement) (which Prepetition First Lien Lenders constitute "Required Lenders," as defined in the Prepetition First Lien Credit Agreement, the "Required Prepetition First Lien Lenders") have expressly consented to the entry of this Final Order and the relief provided herein and pursuant to the terms of the Prepetition First Lien Credit Agreement, the consents of such Prepetition First Lien Lenders are binding on all Prepetition First Lien Secured Parties. None of the remaining Prepetition First Lien Secured Parties has filed an objection to the entry of this Final Order or the relief provided herein, and in any event, the prepetition Liens and security interests of such parties are adequately protected pursuant to the terms of this Final Order. Notwithstanding anything to the contrary herein, the Prepetition First Lien Secured Parties' consent to the DIP Facility and to the priming of the Prepetition First Liens by the DIP Liens is expressly limited to the present DIP Facility and the DIP Liens securing same and shall not be applicable to any other debtor-in-possession credit

facility, even if it contains substantially the same economic terms as this DIP Facility. Pursuant to the terms of the Intercreditor Agreement, the Prepetition Second Lien Noteholders are deemed to have consented to the entry of this Final Order and the relief provided herein.

K. **Section 552**. In light of the subordination of their Liens and superpriority administrative claims to the Carve-Out and the DIP Liens, each of the Prepetition First Lien Secured Parties is entitled to all of the rights and benefits of section 552(b) of the Bankruptcy Code and the "equities of the case" exception shall not apply.

L. **Business Judgment and Good Faith Pursuant to Section 364(e)**.

(i) The DIP Secured Parties have indicated a willingness to provide postpetition secured financing via the DIP Facility to the Debtors in accordance with the DIP Loan Documents and this Final Order.

(ii) The terms and conditions of the DIP Facility and the DIP Backstop Commitment Letters (as defined in the Restructuring Support Agreement and as previously approved on a final basis in the Interim Order) as set forth in the DIP Loan Documents, and the DIP Backstop Commitment Letters and this Final Order, and the fees, expenses and other charges paid and to be paid thereunder or in connection therewith (including, without limitation, the Backstop Premium (as defined in the DIP Backstop Commitment Letters and as previously approved on a final basis in the Interim Order)), are fair, reasonable, and the best available under the circumstances, and the Debtors' agreement to the terms and conditions of the DIP Loan Documents and to the payment of such fees reflect the Debtors' exercise of prudent business judgment consistent with their fiduciary duties. Such terms and conditions are supported by reasonably equivalent value and fair consideration.

(iii) The DIP Secured Parties, the Prepetition First Lien Secured Parties

and the Debtors, with the assistance and counsel of their respective advisors, have acted in good faith and at arms' length in, as applicable, negotiating, consenting to, and/or agreeing to, the DIP Facility, the Debtors' use of the DIP Collateral and the Prepetition First Lien Collateral (including Cash Collateral), the DIP Loan Documents and the DIP Protections (including the Prepetition First Lien Adequate Protection and the Prepetition Second Lien Adequate Protection). The DIP Obligations (including all advances that are made at any time to the Debtors under the DIP Loan Documents) and the Debtors' use of the DIP Collateral, the Prepetition First Lien Collateral and the Prepetition Second Lien Collateral (including Cash Collateral) shall be deemed to have been extended and/or consented to by the DIP Secured Parties, the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties for valid business purposes and uses and in good faith, as that term is used in section 364(e) of the Bankruptcy Code, and in express and good faith reliance upon the protections offered by section 364(e) of the Bankruptcy Code and this Final Order, and, accordingly, the DIP Liens, the DIP Superpriority Claims, the Prepetition First Lien Adequate Protection, the Prepetition Second Lien Adequate Protection and the other DIP Protections shall be entitled to the full protection of section 364(e) of the Bankruptcy Code and this Final Order in the event this Final Order or any other order or any provision hereof or thereof is vacated, reversed, amended, or modified, on appeal or otherwise.

M. **Relief Essential; Best Interest**. For the reasons stated above, the Debtors have requested immediate entry of this Final Order pursuant to Bankruptcy Rules 4001(b)(2) and 4001(c)(2), and the Bankruptcy Local Rules. Absent granting the relief set forth in this Final Order, the Debtors' estates, their businesses and properties and their ability to successfully reorganize or otherwise preserve the enterprise value of the Debtors' estates will be immediately and irreparably harmed. Consummation of the DIP Facility and authorization of the use of Cash

Collateral in accordance with this Final Order and the DIP Loan Documents is therefore in the best interests of the Debtors' estates and consistent with their fiduciary duties. Based on all of the foregoing, sufficient cause exists for immediate entry of this Final Order pursuant to Bankruptcy Rules 4001(b)(2) and 4001(c)(2) and the applicable Local Rules.

NOW, THEREFORE, based on the DIP Motion and the record before this Court with respect to the DIP Motion, and with the consent of the Debtors, the Prepetition First Lien Agent and the requisite Prepetition First Lien Secured Parties (on behalf of all of the Prepetition First Lien Secured Parties), the Prepetition Second Lien Trustee (on behalf of all of the Prepetition Second Lien Secured Parties) and the DIP Agent (on behalf of all of the DIP Secured Parties) to the form and entry of this Final Order, and good and sufficient cause appearing therefor,

IT IS ORDERED that:

1. **Motion Granted**. The DIP Motion is hereby granted in accordance with the terms and conditions set forth in this Final Order and the DIP Loan Documents. Any objections to the DIP Motion with respect to the entry of this Final Order that have not been withdrawn, waived, or settled, and all reservations of rights included therein, are hereby denied and overruled.

2. **DIP Loan Documents and DIP Protections**.

(a) Approval of DIP Loan Documents. The Debtors are expressly and immediately authorized to establish the DIP Facility, to execute, deliver, and perform under the DIP Loan Documents and this Final Order, to incur the DIP Obligations (as defined below), in accordance with, and subject to, the terms of this Final Order and the DIP Loan Documents, and to execute, deliver, and perform under all other instruments, certificates, agreements, and documents that may be required or necessary for the performance by the applicable Debtors under the DIP Loan Documents and the creation and perfection of the DIP Liens described in, and provided for, by

this Final Order and the DIP Loan Documents. The Debtors are hereby authorized and empowered to do and perform all acts and pay the principal, interest, fees, expenses, and other amounts described in the DIP Loan Documents as such become due pursuant to the DIP Loan Documents and this Final Order, including all closing fees, administrative fees, commitment fees, and reasonable attorneys', financial advisors', and accountants' fees, and disbursements arising under the DIP Loan Documents and this Final Order, which amounts shall not be subject to further approval of this Court and shall be non-refundable and not subject to challenge in any respect; provided, however, that the payment of the fees and expenses of the Lender Professionals (as defined below) shall be subject to the provisions of Paragraph 20(b). Upon their execution and delivery, the DIP Loan Documents shall represent the legal, valid and binding obligations of the applicable Debtors enforceable against such Debtors in accordance with their terms. Each officer of a Debtor (including the Chief Transformation Officer) acting singly is hereby authorized to execute and deliver each of the DIP Loan Documents, such execution and delivery to be conclusive evidence of such officer's respective authority to act in the name of and on behalf of the Debtors.

(b) DIP Obligations. For purposes of this Final Order, the term "DIP Obligations" shall mean all amounts and other obligations and liabilities owing by the respective Debtors under the DIP Credit Agreement and other DIP Loan Documents (including all "Obligations" as defined in the DIP Credit Agreement) and shall include the principal of, interest on, and fees, costs, expenses, and other charges owing in respect of, such amounts (including any reasonable attorneys', accountants', financial advisors', and other fees, costs, and expenses that are chargeable or reimbursable under the DIP Loan Documents and/or this Final Order), and any obligations in respect of indemnity claims, whether contingent or otherwise.

(c) Authorization to Incur DIP Obligations and Use Cash Collateral. To enable the Debtors to continue to operate their businesses and preserve and maximize the value of their estates, during the period from the entry of this Final Order through and including the delivery of the Termination Declaration (as defined below), in each case unless extended by written agreement of the Required DIP Lenders and Required Prepetition First Lien Lenders, (I) the Borrower is hereby authorized to (a) incur DIP Obligations in an aggregate principal amount not to exceed $100 million in the aggregate ($37.5 million incremental from the amount approved in the Interim Order) under the DIP Facility and (b) use Cash Collateral and (II) any proposed use of the proceeds of DIP Loans or use of Cash Collateral shall be consistent with the terms and conditions of this Final Order and the DIP Loan Documents, including the Approved Budget and the Budget Covenants as defined and contained in Paragraph 2(e) and (f) below. All DIP Obligations shall be unconditionally guaranteed, on a joint and several basis, by the DIP Guarantors, as further provided in the DIP Loan Documents.

(d) DIP Account. The Debtors shall, immediately upon receipt of any proceeds of the DIP Facility, deposit such amounts into a segregated account (the "DIP Account") of the Borrower, which amounts may only be drawn in accordance with the Approved Budget (subject to Budget Covenants), the terms and conditions of this Final Order, and the DIP Credit Agreement, and with all funds held in the DIP Account deemed to be DIP Collateral. Once withdrawn from the DIP Account, the funds shall continue to be DIP Collateral until such funds are first used by the Debtors, and at all times the Debtors shall, notwithstanding any potential commingling, establish commercially reasonable internal cash management procedures to allow for the continued tracing of such funds. Funds in the DIP Account will become available to be drawn by and/or shall be

disbursed to the Debtors in accordance with the Approved Budget (subject to Budget Covenants), this Final Order, and the DIP Credit Agreement.

(e) Budget. Attached as Schedule 1 to the Interim Order is a rolling 13-week cash flow budget (the "Initial Approved Budget") that reflects on a line-item basis the Debtors' (i) weekly projected cash receipts (including from non-ordinary course assets sales), (ii) weekly projected disbursements (including ordinary course operating expenses, bankruptcy-related expenses under the Chapter 11 Cases, capital expenditures, and estimated fees and expenses of the DIP Agent (including counsel and financial advisors therefor) and any other fees and expenses relating to the DIP Facility), and (iii) the sum of weekly unrestricted cash on hand and cash in the segregated account (collectively, "Liquidity"). The Debtors shall prepare and deliver to the DIP Agent (for distribution to the DIP Lenders) and counsel to the Committee an updated "rolling" 13-week budget in accordance with Schedule 5.01(f) to the DIP Credit Agreement (or, at the option of the Borrower, more frequently) (the "Updated Budget"), which shall become the then "Approved Budget" upon approval by Required DIP Lenders in their sole discretion (and to the extent any Updated Budget is not approved by the Required DIP Lenders, the Approved Budget that is then in effect shall continue to constitute the Approved Budget for purposes of the DIP Facility); provided, however, that (i) the Updated Budget will be deemed approved unless the Required DIP Lenders provide written notice of their objection thereto (email being sufficient) within three (3) Business Days of the delivery of such Updated Budget, and during such period, the Initial Approved Budget or most recent Approved Budget, as applicable, shall remain in effect (the "Interim Approval Period"), (ii) following the Interim Approval Period, if no objection is received from the Required DIP Lenders pursuant to clause (i), the Updated Budget shall be deemed the "Approved Budget" (it being understood that the Approved Budget shall be the initial Approved

Budget until superseded by an approved Updated Budget), and (iii) the Required DIP Lenders shall not have any obligation to approve any Updated Budget. The Debtors shall file a copy of any Approved Budget in these Chapter 11 Cases within one (1) business day of approval. The Borrower shall provide to counsel to the DIP Agent and counsel to the Committee, on or prior to the Friday of each week, Approved Budget variance reports on a line-item basis and Liquidity reports, in each case, for the cumulative Reporting Period pursuant to Schedule 5.01(f) to the DIP Credit Agreement and a computation of Liquidity as of the preceding calendar week-end. Notwithstanding anything to the contrary in this Final Order, the professional fees, costs and expenses of the DIP Agent's advisors and the Prepetition First Lien Agent's advisors, respectively, shall be due, payable and paid in accordance with the terms of this Final Order notwithstanding any budgeted amounts for such fees, costs and expenses set forth in the Approved Budget, and the Debtors shall not be deemed to have breached the terms of the Approved Budget or the Budget Covenants (as defined in 2(f)) to the extent the actual amount of such fees, costs and expenses exceed the applicable budgeted amounts as set forth in the Approved Budget. For the avoidance of doubt, the foregoing shall not limit the timely payment of Allowed Professional Fees that benefit from the Carve-Out as set forth in Paragraph 7.

(f) Budget Covenants. The Debtors shall only incur DIP Obligations in accordance with the DIP Loan Documents and this Final Order. It shall be an Event of Default under the DIP Loan Documents if the Debtors expend Cash Collateral and other DIP Collateral proceeds other than in accordance with the Approved Budget (and in the case of the fees, costs and expenses of the Required DIP Lenders, the Required Prepetition First Lien Lenders, in accordance with the DIP Loan Documents and this Final Order without being limited by the Approved Budget), subject to the following Permitted Variances (as defined below). As of the last date of each Test

Period, (1) the unfavorable variance (as compared to the Approved Budget) of the cumulative operating cash receipts of the Debtors shall not exceed 15% and (2) the unfavorable variance (as compared to the Approved Budget) of the cumulative operating disbursements (other than professional fees and expenses incurred by the Debtors, the DIP Agent, and the advisors to the Backstop Parties (as defined in the DIP Backstop Commitment Letters)) shall not exceed 15%, in each case, (collectively, the "Permitted Variances"). "Test Period" shall mean (i) initially, the period commencing on the Monday immediately prior to the Petition Date and ending on September 28, 2025, and (ii) thereafter, the four- or five-week period ending on the last Sunday of the month. For the avoidance of doubt, see Schedule 5.01(f) to the DIP Credit Agreement for Variance and Liquidity reporting. The foregoing budget-related covenants are collectively referred to herein as the "Budget Covenants." The foregoing shall not limit the timely payment of Allowed Professional Fees (regardless of whether such amounts are set forth in the Approved Budget) prior to the delivery of a Carve-Out Trigger Notice.

(g) Interest, Fees, Costs, Indemnities and Expenses. The DIP Obligations shall bear interest at the rates, and be due and payable (and paid), as set forth in, and in accordance with the terms and conditions of, this Final Order and the DIP Loan Documents, in each case without further notice, motion, or application to, order of, or hearing before, this Court. The Debtors shall pay on demand all fees, costs, indemnities, expenses (including, subject to Paragraph 20(b), reasonable out-of-pocket legal and other professional fees and expenses of the DIP Agent) and other charges payable under the terms of the DIP Loan Documents. All such fees, costs, indemnities, expenses and disbursements, whether incurred, paid or required to be paid prepetition or post-petition and whether or not budgeted in the Approved Budget, are hereby affirmed, ratified, authorized and payable (and any funds held by the DIP Agent and/or its

professionals as of the Petition Date for payment of such fees, costs, indemnities, expenses and disbursements may be applied for payment) as contemplated in this Final Order and the DIP Loan Documents, and, subject to the provisions of Paragraph 20(b) with respect to the fees and expenses of the Lender Professionals, shall be non-refundable and not subject to challenge in any respect.

(h) Use of DIP Facility and Proceeds of DIP Collateral. The Borrower shall use the proceeds of all DIP Collateral solely in accordance with this Final Order and the DIP Loan Documents; provided, that the foregoing shall not limit the timely payment of Allowed Professional Fees that benefit from the Carve-Out as set forth in Paragraph 7. Without limiting the foregoing, the Debtors shall not be permitted to make any payments from the DIP Collateral, the proceeds of DIP Loans or otherwise on account of any prepetition debt or obligation prior to the effective date of a confirmed chapter 11 plan or plans with respect to any of the Debtors, except (a) with respect to the Prepetition First Lien Obligations as set forth in the Interim Order and this Final Order; (b) as provided in the "first day" orders, which "first day" orders shall be in form and substance reasonably acceptable to the Required DIP Lenders and the Required Prepetition First Lien Lenders; (c) as expressly provided in other orders of this Court in form and substance reasonably acceptable to the Required DIP Lenders and the Required Prepetition First Lien Lenders; or (d) as otherwise expressly provided in the DIP Credit Agreement.

(i) Conditions Precedent. The DIP Secured Parties, the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties each have no obligation to extend credit under the DIP Facility or permit use of any DIP Collateral, Prepetition First Lien Collateral or Prepetition Second Lien Collateral or any proceeds thereof, including Cash Collateral, as applicable, unless and until all conditions precedent to the extension of credit and/or use of DIP

Collateral, Prepetition First Lien Collateral, Prepetition Second Lien Collateral or proceeds thereof under the DIP Loan Documents and this Final Order have been satisfied in full or waived by the Required DIP Lenders and the Required Prepetition First Lien Lenders in accordance with the DIP Loan Documents or Prepetition First Lien Credit Agreement or Intercreditor Agreement, as applicable, and this Final Order.

(j) DIP Liens. As security for the DIP Obligations, effective as of the Petition Date, the following security interests and Liens, which shall immediately and without any further action by any Person be valid, binding, permanent, perfected, continuing, enforceable, and non-avoidable upon the entry of this Final Order, are hereby granted by the Debtors to the DIP Agent, for itself and the other DIP Secured Parties (all such security interests and Liens granted to the DIP Agent for the benefit of all the DIP Secured Parties pursuant to this Final Order and the DIP Loan Documents, the "DIP Liens"), on all property of the Debtors, now existing or hereinafter acquired, including all cash and cash equivalents (whether maintained with the DIP Agent or otherwise), and any investment in such cash or cash equivalents, money, inventory, goods, accounts receivable, other rights to payment, intercompany loans and other investments, securities and other investment property, contracts, contract rights, properties, plants, equipment, machinery, general intangibles, payment intangibles, accounts, deposit accounts, documents, instruments, chattel paper, documents of title, letters of credit, letter of credit rights, supporting obligations, leases and other interests in leaseholds, real property, fixtures, patents, copyrights, trademarks, trade names, other intellectual property, intellectual property licenses, permits, franchise rights, capital stock and other equity interests of subsidiaries and in other entities, tax and other refunds, insurance proceeds, commercial tort claims, the proceeds of Avoidance Actions, and other causes of action, and proceeds relating thereto, proceeds arising under section 549 of the Bankruptcy Code (whether

received by judgment, settlement or otherwise), all other Collateral (as defined in the DIP Loan Documents), and all other "property of the estate" (as defined in section 541 of the Bankruptcy Code) of any kind or nature, real or personal, tangible, intangible, or mixed, now existing or hereafter acquired or created, and all rents, products, substitutions, accessions, profits, replacements, and cash and non-cash proceeds of all of the foregoing, in each case wherever located; provided, however, that the DIP Liens shall not include any "Excluded Assets" (as defined in the DIP Loan Documents) (all of the foregoing collateral collectively referred to as the "DIP Collateral"):

(I) pursuant to section 364(c)(2) of the Bankruptcy Code, a perfected, binding, continuing, enforceable, and non-avoidable first priority Lien (junior only to the Carve-Out) on all unencumbered DIP Collateral, including proceeds of the Debtors' claims and causes of action under sections 502(d), 544, 545, 547, 548, 550 and 553 of the Bankruptcy Code and any other avoidance or similar action under the Bankruptcy Code or similar state or municipal law and the proceeds of each of the foregoing (collectively, the "Avoidance Actions", which for avoidance of doubt, excludes proceeds arising from the Debtors' claims and causes of action under section 549 of the Bankruptcy Code or similar state or municipal law), whether received by judgment, settlement, or otherwise;

(II) pursuant to section 364(c)(3) of the Bankruptcy Code, a perfected, binding, continuing, enforceable, and non-avoidable Lien upon all DIP Collateral that is subject to the Prepetition Prior Liens, which DIP Lien shall be junior only to such Prepetition Prior Liens and the Carve-Out; and

(III) pursuant to section 364(d)(1) of the Bankruptcy Code, a perfected, binding, continuing, enforceable and non-avoidable first priority, senior priming Lien on all other DIP Collateral (including Cash Collateral), which DIP Lien (x) shall be senior to the First Lien Adequate Protection Liens and the Second Lien Adequate Protection Liens and senior and priming to (A) the Prepetition First Liens, (B) the Prepetition Second Liens and (C) any other Liens that are junior to the Prepetition First Liens or the First Lien Adequate Protection Liens, after giving effect to any intercreditor or subordination agreements (the Liens referenced in clauses (A) and (B), collectively, the "Primed Liens") and shall be junior only to the Prepetition Prior Liens and the Carve-Out.

(k) DIP Lien Priority. Notwithstanding anything to the contrary contained in this Final Order or the DIP Loan Documents, for the avoidance of doubt, the DIP Liens granted to the DIP

Agent for the benefit of the DIP Secured Parties shall in each and every case be first priority senior Liens that (i) are subject only to the Prepetition Prior Liens and the Carve-Out, and (ii) except as provided in the immediately preceding sub-clause (i), are senior to all prepetition and postpetition Liens or other interests of any kind of any other person or entity (including the Primed Liens, the First Lien Adequate Protection Liens and the Second Lien Adequate Protection Liens), whether created voluntarily or involuntarily (including by order of a court).

(l) Enforceable Obligations. The DIP Loan Documents shall constitute and evidence the valid and binding DIP Obligations of the Debtors, which DIP Obligations shall be enforceable against the Debtors, their estates and any successors thereto (including any trustee or other estate representative in any Successor Case (as defined below)), and their creditors and other parties-in-interest, in accordance with their terms. No obligation, payment, transfer, or grant of security under the DIP Credit Agreement, the other DIP Loan Documents, or this Final Order shall be stayed, restrained, voidable, avoidable, disallowable or recoverable under the Bankruptcy Code or under any applicable law (including under sections 502(d), 544, 547, 548, or 549 of the Bankruptcy Code or under any applicable state Uniform Fraudulent Transfer Act, Uniform Fraudulent Conveyance Act, or similar statute or common law), or subject to any avoidance, reduction, setoff, surcharge, recoupment, offset, recharacterization, subordination (whether equitable, contractual, or otherwise), counterclaim, cross-claim, defense, or any other challenge under the Bankruptcy Code or any applicable law or regulation by any person or entity.

(m) Superpriority Administrative Claim Status. In addition to the DIP Liens granted herein, effective immediately upon entry of this Final Order, all of the DIP Obligations shall constitute allowed superpriority administrative claims pursuant to section 364(c)(1) of the Bankruptcy Code, which shall have priority, subject only to the payment of the Carve-Out in full

in cash in accordance with this Final Order, over all administrative expense claims, adequate protection and other diminution claims (including the First Lien Adequate Protection Superpriority Claims and the Second Lien Adequate Protection Superpriority Claims (each as defined below)), priority and other unsecured claims, and all other claims against the Debtors or their estates, now existing or hereafter arising, of any kind or nature whatsoever, including administrative expenses or other claims of the kinds specified in, or ordered pursuant to, sections 105, 326, 328, 330, 331, 503(a), 503(b), 506(c), 507(a), 507(b), 546, 726, 1113, and 1114 or any other provision of the Bankruptcy Code or otherwise, whether or not such expenses or claims may become secured by a judgment Lien or other non-consensual Lien, levy, or attachment (the "DIP Superpriority Claims"). The DIP Superpriority Claims shall, for purposes of section 1129(a)(9)(A) of the Bankruptcy Code, be considered administrative expenses allowed under section 503(b) of the Bankruptcy Code, shall be against each Debtor on a joint and several basis, and shall be payable from and have recourse to all prepetition and postpetition property of the Debtors and all proceeds thereof, excluding any Avoidance Actions but including proceeds of any Avoidance Actions. Other than as expressly provided in the DIP Credit Agreement and/or this Final Order with respect to the Carve-Out, no costs or expenses of administration, including professional fees allowed and payable under sections 328, 330, or 331 of the Bankruptcy Code, or otherwise, that have been or may be incurred in these proceedings, or in any Successor Cases, and no priority claims are, or will be, senior to, prior to, or on a parity with the DIP Superpriority Claims or the DIP Obligations, or with any other claims of the DIP Secured Parties arising under the DIP Loan Documents and/or this Final Order.

(n) Priority of DIP Liens and DIP Superpriority Claims. Without affecting, modifying or limiting the scope or priority of the Carve-Out, the DIP Liens and the DIP Superpriority Claims:

(A) shall not be subject to sections 506, 510, 549, 550, or 551 of the Bankruptcy Code, (B) shall not be subordinate to, or *pari passu* with, (x) any Lien that is avoided and preserved for the benefit of the Debtors and their estates under section 551 of the Bankruptcy Code or otherwise or (y) any Liens or claims of any Debtor or any direct or indirect subsidiary thereof against any Debtor or any of such Debtor's property, (C) shall be valid and enforceable against any trustee or any other estate representative elected or appointed in the Chapter 11 Cases, upon the conversion of any of the Chapter 11 Cases to a case under chapter 7 of the Bankruptcy Code or in any other proceedings related to any of the foregoing (each, a "Successor Case"), and/or upon the dismissal of any of the Chapter 11 Cases, and (D) notwithstanding anything to the contrary in any "first day" orders of this Court in any of the Chapter 11 Cases, shall be senior to any administrative claims arising under any such "first day" orders.

3. **Adequate Protection for Prepetition First Lien Secured Parties**. In consideration for the use of the Prepetition First Lien Collateral (including Cash Collateral) and the priming of the Prepetition First Liens, the Prepetition First Lien Agent, for the benefit of the Prepetition First Lien Secured Parties, shall receive the following adequate protection (collectively referred to as the "Prepetition First Lien Adequate Protection"):

(i) First Lien Adequate Protection Liens. To the extent there is a diminution in value of the interests of the Prepetition First Lien Secured Parties in the Prepetition First Lien Collateral (including Cash Collateral) from and after the Petition Date, whether or not resulting from the use, sale, or lease by the Debtors of the applicable Prepetition First Lien Collateral (including Cash Collateral), the granting of the DIP Superpriority Claims, the granting of the DIP Liens, the subordination of the Prepetition First Liens thereto and to the Carve-Out, the imposition or enforcement of the automatic stay of section 362(a) of the Bankruptcy Code

("Diminution in Prepetition First Lien Collateral Value"), the Prepetition First Lien Agent, for the benefit of all the Prepetition First Lien Secured Parties, is hereby granted, subject to the terms and conditions set forth below, pursuant to sections 361 and 363(e) of the Bankruptcy Code, replacement Liens upon all of the DIP Collateral, including the proceeds of Avoidance Actions (such adequate protection replacement Liens, the "First Lien Adequate Protection Liens"), which First Lien Adequate Protection Liens on such DIP Collateral shall be subject and subordinate only to the DIP Liens, the Prepetition Prior Liens, and the Carve-Out.

(ii) First Lien Adequate Protection Superpriority Claims. To the extent of Diminution in Prepetition First Lien Collateral Value, the Prepetition First Lien Secured Parties are hereby further granted allowed superpriority administrative claims (such adequate protection superpriority claims, the "First Lien Adequate Protection Superpriority Claims"), pursuant to section 507(b) of the Bankruptcy Code, with priority over all administrative expense claims and priority and other unsecured claims against the Debtors or their estates, now existing or hereafter arising, of any kind or nature whatsoever, including administrative expenses of the kind specified in or ordered pursuant to sections 105, 326, 328, 330, 331, 503(a), 503(b), 506(c), 507(a), 507(b), 546(c), 546(d), 726, 1113, 1114 or any other provision of the Bankruptcy Code or otherwise, junior only to the DIP Superpriority Claims and the Carve-Out, and payable from and having recourse to all prepetition and postpetition property of the Debtors and all proceeds thereof (excluding any Avoidance Actions but including all proceeds of any Avoidance Actions); provided, however, that the Prepetition First Lien Secured Parties shall not receive or retain any payments, property, or other amounts in respect of the First Lien Adequate Protection Superpriority Claims unless and until all DIP Obligations have been Paid in Full (as defined below). Subject to the relative priorities set forth above, the First Lien Adequate Protection Superpriority Claims against each

Debtor shall be allowed and enforceable against each Debtor and its estate on a joint and several basis. For purposes of this Final Order, the terms "Paid in Full," "Repaid in Full," "Repay in Full," and "Payment in Full" shall mean, with respect to any referenced DIP Obligations, Prepetition First Lien Obligations and/or Prepetition Second Lien Obligations, (i) the indefeasible payment in full in cash of such obligations, (ii) the termination or cash collateralization, in accordance with the DIP Loan Documents, Prepetition First Lien Loan Documents or Prepetition Second Lien Loan Documents, as applicable, of all undrawn letters of credit outstanding thereunder, and (iii) the termination of all credit commitments under the DIP Loan Documents, Prepetition First Lien Loan Documents and/or Prepetition Second Lien Loan Documents, as applicable; provided, however, that the First Lien Adequate Protection Superpriority Claims granted to the Prepetition First Lien Secured Parties may be impaired pursuant to any chapter 11 plan of reorganization in the Chapter 11 Cases with the vote of the applicable class of the holders of such claims that satisfies the requirements of section 1126 of the Bankruptcy Code, in which case, Paid in Full (or any of the other variants of this phrase referenced above) would occur upon consummation of such plan.

(iii) Priority of First Lien Adequate Protection Liens and First Lien Adequate Protection Superpriority Claims. Without affecting, modifying or limiting the scope or priority of the Carve-Out, the First Lien Adequate Protection Liens and the First Lien Adequate Protection Superpriority Claim (as defined below) (A) shall not be subject to sections 506(c), 510, 549, 550, or 551 of the Bankruptcy Code or the "equities of the case" exception of section 552 of the Bankruptcy Code, (B) shall not be subordinate to, or *pari passu* with, (x) any Lien that is avoided and preserved for the benefit of the Debtors and their estates under section 551 of the Bankruptcy Code or otherwise or (y) any Liens or claims of any Debtor or any direct or indirect subsidiary thereof against any Debtor or any of such Debtor's property, (C) shall be valid, binding,

perfected and enforceable against any trustee or any other estate representative elected or appointed in the Chapter 11 Cases or any Successor Cases, and/or upon the dismissal of any of the Chapter 11 Cases, and (D) notwithstanding anything to the contrary in any "first day" orders of this Court in any of the Chapter 11 Cases, shall be senior to any administrative claims arising under any such "first day" orders.

(iv) Professional Fees and Interest. Without limiting any rights of the Prepetition First Lien Agent and the other Prepetition First Lien Secured Parties under section 506(b) of the Bankruptcy Code, which rights are hereby preserved, and in consideration, and as a requirement, for obtaining the consent of the Prepetition First Lien Secured Parties to the entry of this Final Order and the Debtors' consensual use of Cash Collateral as provided herein, the Debtors shall (i) pay or reimburse in cash the Prepetition First Lien Agent for any and all fees, costs, expenses, and charges (including, subject to Paragraph 20(b) below, the reasonable fees, costs, and expenses of counsel and financial advisors for the Prepetition First Lien Agent) to the extent, and at the times, payable under the Prepetition First Lien Loan Documents, including any unpaid fees, costs and expenses accrued prior to the Petition Date and (ii) to the extent the Prepetition First Lien Secured Parties are oversecured under section 506(b) of the Bankruptcy Code, pay to the applicable Prepetition First Lien Secured Parties interest on the Prepetition First Lien Obligations under the Prepetition First Lien Credit Agreement accruing at the applicable rate set forth in Section 2.13(d) of the Prepetition First Lien Credit Agreement, to be capitalized to the outstanding principal of the Loans on the last Business Day of each calendar month after the Petition Date whether or not budgeted in the Approved Budget, and without further notice (except as provided in Paragraph 20(b) below with respect to postpetition professional fees, costs, and expenses), motion, or application to, order of, or hearing before, this Court; *provided*, that, to the extent the

Prepetition First Lien Secured Parties are undersecured, no postpetition interest shall accrue or be payable to the Prepetition First Lien Secured Parties and any previously accrued or capitalized postpetition interest amounts shall be waived.

(v) First Lien Reporting. The Debtors shall deliver to the Prepetition First Lien Secured Parties all information, reports, documents and other material that the Debtors provide to the DIP Secured Parties pursuant to the DIP Loan Documents.

(vi) Unless otherwise expressly set forth herein, any consent or approval rights or similar rights granted or referenced in this Final Order in favor of any or all of the DIP Agent, the other DIP Secured Parties, the Prepetition First Lien Agent and the other Prepetition First Lien Secured Parties may be exercised (or not exercised) in the sole discretion of such party.

(vii) Consent to Priming and Adequate Protection. The Prepetition First Lien Agent, on behalf of the Prepetition First Lien Secured Parties, consents to the Prepetition First Lien Adequate Protection and the priming provided for herein; provided, however, that such consent of the Prepetition First Lien Agent to the priming of the Prepetition First Liens and the use of Cash Collateral is expressly conditioned upon the entry of this Final Order, and such consent shall not be deemed to extend to any other Cash Collateral usage or other replacement financing or debtor-in-possession financing other than the DIP Facility provided under the DIP Loan Documents; and provided, further, that such consent shall be of no force and effect in the event this Final Order is not entered or is entered and subsequently reversed, modified, stayed, or amended (unless such reversal, modification, stay, or amendment is acceptable to the Prepetition First Lien Agent) or the DIP Loan Documents and DIP Facility as set forth herein are not approved.

(viii) Right to Seek Additional Adequate Protection. Under the circumstances and given that the above-described adequate protection is consistent with the

Bankruptcy Code, including section 506(b) thereof, this Court finds that the adequate protection provided herein is reasonable to protect the interests of the Prepetition First Lien Secured Parties. However, the Prepetition First Lien Agent, on behalf of the Prepetition First Lien Secured Parties, may request Court approval for additional or alternative adequate protection, without prejudice to any objection of the Debtors or any other party in interest to the grant of any additional or alternative adequate protection (except as provided in the Intercreditor Agreement); provided that any such additional or alternative adequate protection shall at all times be subordinate and junior to (i) the Carve-Out and (ii) the claims and Liens of the DIP Secured Parties granted under this Final Order and the DIP Loan Documents. The consent of the Prepetition First Lien Secured Parties to the priming of the Prepetition First Liens by the DIP Liens and the Debtors' use of Cash Collateral on the terms set forth herein does not constitute, and shall not be construed as constituting, an acknowledgment or stipulation by the Prepetition First Lien Secured Parties that their respective interests in the Prepetition First Lien Collateral are adequately protected pursuant to this Final Order or otherwise.

4. **Adequate Protection for Prepetition Second Lien Secured Parties**. In consideration for the use of the Prepetition Second Lien Collateral (including Cash Collateral) and the priming of the Prepetition Second Liens, the Prepetition Second Lien Trustee, for the benefit of the Prepetition Second Lien Secured Parties, shall receive the following adequate protection (collectively referred to as the "Prepetition Second Lien Adequate Protection"):

(i) Second Lien Adequate Protection Liens. To the extent there is a diminution in value of the interests of the Prepetition Second Lien Secured Parties in the Prepetition Second Lien Collateral (including Cash Collateral) from and after the Petition Date, whether or not resulting from the use, sale, or lease by the Debtors of the applicable Prepetition

Second Lien Collateral (including Cash Collateral), the granting of the DIP Superpriority Claims, the granting of the DIP Liens, the subordination of the Prepetition Second Liens thereto and to the Carve-Out, the imposition or enforcement of the automatic stay of section 362(a) of the Bankruptcy Code ("Diminution in Prepetition Second Lien Collateral Value"), the Prepetition Second Lien Trustee, for the benefit of all the Prepetition Second Lien Secured Parties, is hereby granted, subject to the terms and conditions set forth below, pursuant to sections 361 and 363(e) of the Bankruptcy Code, replacement Liens upon all of the DIP Collateral, including the proceeds of Avoidance Actions (such adequate protection replacement Liens, the "Second Lien Adequate Protection Liens"), which Second Lien Adequate Protection Liens on such DIP Collateral shall be subject and subordinate only to the DIP Liens, the Prepetition Prior Liens, the Prepetition First Liens, the First Lien Adequate Protection Liens and the Carve-Out.

(ii) Second Lien Adequate Protection Superpriority Claims. To the extent of Diminution in Prepetition Second Lien Collateral Value, the Prepetition Second Lien Secured Parties are hereby further granted allowed superpriority administrative claims (such adequate protection superpriority claims, the "Second Lien Adequate Protection Superpriority Claims"), pursuant to section 507(b) of the Bankruptcy Code, with priority over all administrative expense claims and priority and other unsecured claims against the Debtors or their estates, now existing or hereafter arising, of any kind or nature whatsoever, including administrative expenses of the kind specified in or ordered pursuant to sections 105, 326, 328, 330, 331, 503(a), 503(b), 506(c), 507(a), 507(b), 546(c), 546(d), 726, 1113, 1114 or any other provision of the Bankruptcy Code or otherwise, junior only to the DIP Superpriority Claims, the First Lien Adequate Protection Superpriority Claims and the Carve-Out, and payable from and having recourse to all prepetition and postpetition property of the Debtors and all proceeds thereof (excluding any Avoidance

Actions but including all the proceeds of Avoidance Actions); provided, however, that the Prepetition Second Lien Secured Parties shall not receive or retain any payments, property, or other amounts in respect of the Second Lien Adequate Protection Superpriority Claims unless and until all DIP Obligations and Prepetition First Lien Obligations have been Paid in Full; provided, further, that the Second Lien Adequate Protection Superpriority Claims granted to the Prepetition Second Lien Secured Parties may be impaired pursuant to any chapter 11 plan of reorganization in the Chapter 11 Cases with the vote of the applicable class of the holders of such claims that satisfies the requirements of section 1126 of the Bankruptcy Code, in which case, Paid in Full (or any of the other variants of this phrase referenced above) would occur upon consummation of such plan. Subject to the relative priorities set forth above, the Second Lien Adequate Protection Superpriority Claims against each Debtor shall be allowed and enforceable against each Debtor and its estate on a joint and several basis.

(iii) Priority of Second Lien Adequate Protection Liens and Second Lien Adequate Protection Superpriority Claims. Without affecting, modifying or limiting the scope or priority of the Carve-Out, the Second Lien Adequate Protection Liens and the Second Lien Adequate Protection Superpriority Claim (as defined below) (A) shall not be subject to sections 506(c), 510, 549, 550, or 551 of the Bankruptcy Code or the "equities of the case" exception of section 552 of the Bankruptcy Code, (B) shall not be subordinate to, or *pari passu* with, (x) any Lien that is avoided and preserved for the benefit of the Debtors and their estates under section 551 of the Bankruptcy Code or otherwise or (y) any Liens or claims of any Debtor or any direct or indirect subsidiary thereof against any Debtor or any of such Debtor's property, (C) shall be valid, binding, perfected and enforceable against any trustee or any other estate representative elected or appointed in the Chapter 11 Cases or any Successor Cases, and/or upon the dismissal of any of the

Chapter 11 Cases, and (D) notwithstanding anything to the contrary in any "first day" orders of this Court in any of the Chapter 11 Cases, shall be senior to any administrative claims arising under any such "first day" orders.

(iv) Second Lien Reporting. The Debtors shall deliver to the Prepetition Second Lien Secured Parties all information, reports, documents and other material that the Debtors provide to the DIP Secured Parties pursuant to the DIP Loan Documents.

(v) Consent to Priming and Adequate Protection. The Prepetition Second Lien Trustee, on behalf of the Prepetition Second Lien Secured Parties, consents to the Prepetition Second Lien Adequate Protection and the priming provided for herein; provided, however, that such consent of the Prepetition Second Lien Trustee to the priming of the Prepetition Second Liens and the use of Cash Collateral is expressly conditioned upon the entry of this Final Order, and such consent shall not be deemed to extend to any other Cash Collateral usage or other replacement financing or debtor-in-possession financing other than the DIP Facility provided under the DIP Loan Documents; and provided, further, that such consent shall be of no force and effect in the event this Final Order is not entered or is entered and subsequently reversed, modified, stayed, or amended (unless such reversal, modification, stay, or amendment is acceptable to the Prepetition Second Lien Trustee) or the DIP Loan Documents and DIP Facility as set forth herein are not approved.

5. **Automatic Postpetition Lien Perfection.** This Final Order shall be sufficient and conclusive evidence of the validity, enforceability, perfection, and priority of the DIP Liens, the First Lien Adequate Protection Liens and the Second Lien Adequate Protection Liens without the necessity of (a) filing or recording any financing statement, deed of trust, mortgage, or other instrument or document that may otherwise be required under the law of any jurisdiction, (b)

obtaining "control" (as defined in any applicable Uniform Commercial Code or other law) over any DIP Collateral (and the DIP Agent and, after Payment in Full of the DIP Facility, the Prepetition First Lien Agent and, after Payment in Full of the Prepetition First Lien Credit Agreement, the Prepetition Second Lien Trustee shall be deemed, without any further action, to have control over all the Debtors' deposit accounts, securities accounts and commodities accounts within the meaning of such Uniform Commercial Code and other law) or (c) taking any other action to validate or perfect the DIP Liens, the First Lien Adequate Protection Liens and the Second Lien Adequate Protection Liens or to entitle the DIP Liens, the First Lien Adequate Protection Liens and the Second Lien Adequate Protection Liens to the priorities granted herein. Notwithstanding the foregoing, each of the DIP Agent, the Prepetition First Lien Agent (in the latter case, solely with respect to the First Lien Adequate Protection Liens) and the Prepetition Second Lien Trustee (in the latter case, solely with respect to the Second Lien Adequate Protection Liens) may, each in their sole discretion, enter into and file, as applicable, financing statements, mortgages, security agreements, notices of Liens, and other similar documents, and is hereby granted relief from the automatic stay of section 362 of the Bankruptcy Code in order to do so, and all such financing statements, mortgages, security agreements, notices, and other agreements or documents shall be deemed to have been entered into, filed or recorded as of the Petition Date. The applicable Debtors shall execute and deliver to the DIP Agent, the Prepetition First Lien Agent and/or the Prepetition Second Lien Trustee, as applicable, all such financing statements, mortgages, notices, and other documents as such parties may reasonably request to evidence and confirm the contemplated validity, perfection and priority of the DIP Liens, the First Lien Adequate Protection Liens and the Second Lien Adequate Protection Liens, as applicable, granted pursuant hereto. Without limiting the foregoing, each of the DIP Agent, the Prepetition First Lien

Agent and the Prepetition Second Lien Trustee may, in its discretion, file a photocopy of this Final Order as a financing statement with any recording officer designated to file financing statements or with any registry of deeds or similar office in any jurisdiction in which any Debtor has real or personal property, and in such event, the subject filing or recording officer shall be authorized to file or record such copy of this Final Order. Any provision of any lease, loan document, easement, use agreement, proffer, covenant, license, contract, organizational document, or other instrument or agreement that requires the payment of any fees or other monetary obligations to any governmental entity or non-governmental entity in order for the Debtors to pledge, grant, mortgage, sell, assign, or otherwise transfer any fee or leasehold interest or the proceeds thereof or other DIP Collateral is and shall be deemed to be inconsistent with the provisions of the Bankruptcy Code, and shall have no force or effect with respect to the Liens on such leasehold interests or other applicable DIP Collateral or the proceeds of any assignment and/or sale thereof by any Debtor, in favor of the DIP Secured Parties in accordance with the terms of the DIP Loan Documents and this Final Order or in favor of the Prepetition First Lien Secured Parties or the Prepetition Second Lien Secured Parties in accordance with this Final Order. To the extent that the Prepetition First Lien Agent is the secured party under any security agreement, mortgage, leasehold mortgage, landlord waiver, financing statement, or account control agreements, listed as loss payee or additional insured under any of the Debtors' insurance policies, or is the secured party under any of the Prepetition First Lien Loan Documents, the DIP Agent shall also be deemed to be the secured party under such account control agreements, loss payee or additional insured under the Debtors' insurance policies, and the secured party under each such Prepetition First Lien Loan Document, shall have all rights and powers attendant to that position (including rights of enforcement), and shall act in that capacity and distribute any proceeds recovered or received first,

for the benefit of the DIP Secured Parties in accordance with the DIP Loan Documents and second, subsequent to Payment in Full of all DIP Obligations, for the benefit of the Prepetition First Lien Secured Parties and third, subsequent to the Payment in Full of all Prepetition First Lien Obligations, for the benefit of the Prepetition Second Lien Secured Parties. The Prepetition First Lien Agent shall serve as agent for the DIP Agent for purposes of perfecting the DIP Agent's Liens on all DIP Collateral that, without giving effect to the Bankruptcy Code and this Final Order, is of a type such that perfection of a Lien therein may be accomplished only by possession or control by a secured party.

6. **Committee Challenge Rights**. Notwithstanding anything herein to the contrary, the Committee shall have the right to seek standing to assert claims and causes of action against any of the Prepetition First Lien Secured Parties and any of the Prepetition Second Lien Secured Parties (including derivative claims), including with respect to the stipulations set forth in Paragraphs D, E and F hereof; *provided*, that the Debtors and all other parties in interest expressly reserve all rights to object to, oppose, and contest any such request for standing.

7. **Carve-Out**.

(i) As used in this Final Order, the term "Carve-Out" means the sum of the following: (a) all fees required to be paid to the Clerk of the Court and to the U.S. Trustee under 28 U.S.C. § 1930(a) plus interest at the statutory rate (without regard to the notice set forth in sub-paragraph (ii) below); (b) all reasonable fees, costs, and expenses up to $75,000 incurred by a trustee under section 726(b) of the Bankruptcy Code (without regard to the notice set forth in sub-paragraph (ii) below); (c) to the extent allowed by the Court at any time, whether by interim or final compensation order, procedural order, or otherwise, all unpaid fees, costs, and expenses (collectively, the "Allowed Debtor Professional Fees") earned, accrued or incurred by persons or

firms retained by the Debtors pursuant to section 327, 328, or 363 of the Bankruptcy Code (collectively, the "Debtor Professionals") at any time before or on the first Business Day following delivery by the DIP Agent of a Carve-Out Trigger Notice (as defined below), whether allowed by the Court prior to or after delivery of a Carve-Out Trigger Notice and without regard to whether such Allowed Debtor Professional Fees are provided for in the Approved Budget or when invoiced; (d) to the extent allowed by the Court at any time, whether by interim or final compensation order, procedural order, or otherwise, all unpaid fees, costs, and expenses (collectively, the "Allowed Committee Professional Fees" and, together with the Allowed Debtor Professional Fees, the "Allowed Professional Fees") earned, accrued or incurred by persons or firms retained by the Creditors Committee pursuant to section 328 or 1103 of the Bankruptcy Code (collectively, the "Committee Professionals" and, together with the Debtor Professionals, the "Professional Persons") at any time before or on the first Business Day following delivery by the DIP Agent of a Carve-Out Trigger Notice and without regard to whether such Allowed Committee Professional Fees are provided for in the Approved Budget or when invoiced and subject to the investigation budget set forth in Paragraph 16 below (the aggregate amounts set forth in clauses (a) through (d) above, the "Pre-Carve-Out Trigger Notice Amount"); and (e) Allowed Debtor Professional Fees in an aggregate amount not to exceed $2,500,000 and Allowed Committee Professional Fees in an aggregate amount not to exceed $250,000, in each case earned, accrued or incurred after the first Business Day following the date of delivery by the DIP Agent of the Carve-Out Trigger Notice in accordance with sub-paragraph (ii) below (such date, the "Trigger Date"), to the extent allowed by the Court at any time, whether by interim or final compensation order, procedural order, or otherwise (the amounts set forth in this clause (e) being the "Post-Carve-Out

Trigger Notice Amount" and, together with the Pre-Carve-Out Trigger Notice Amount, the "Carve-Out Amount").

(ii) For purposes of the foregoing, "Carve-Out Trigger Notice" shall mean a written notice delivered by email (or other electronic means) by the DIP Agent (at the direction of the Required DIP Lenders) to the Borrower, counsel to the Borrower (Latham & Watkins), the U.S. Trustee, and counsel to the Committee (White & Case), which notice (A) shall expressly state that the Post-Carve-Out Trigger Notice Amount has been invoked and (B) may be delivered only following the occurrence and during the continuation of Termination Event (as defined herein), the acceleration of the DIP Obligations under the DIP Loan Documents, and the termination of the Debtors' consensual use of Cash Collateral under this Final Order.

(iii) From and after the Petition Date, the Debtors shall utilize cash on hand, the proceeds from the DIP Facility, amounts held in the DIP Account, and/or any other available cash thereafter held by any Debtor to fund, on a weekly basis, the Pre-Carve-Out Trigger Notice Amount into the Escrow Account (as defined below) in an amount equal to the greatest of (A) the aggregate unpaid amount of estimated fees, costs, and expenses of Professional Persons included in all weekly estimates timely received by the Debtors in respect of the preceding week, (B) the aggregate unpaid amount of actual fees, costs, and expenses of Professional Persons earned, accrued or incurred at the applicable time, and (C) the aggregate amount of fees, costs, and expenses of Professional Persons provided for in the Approved Budget at the applicable time. As used herein, the term "Escrow Account" means a segregated account of the Borrower not subject to the control of any DIP Secured Party, Prepetition First Lien Secured Party, and/or Prepetition Second Lien Secured Party (collectively, the "Funded Debt Secured Parties").

(iv) Upon delivery of a Carve-Out Trigger Notice in accordance with sub-paragraph (ii) above, such Carve-Out Trigger Notice shall constitute a demand to, and approval for, the Debtors to utilize all cash on hand as of such date (including in the DIP Account) and any available cash thereafter generated by the Debtors to fund the Escrow Account in an amount equal to the Carve-Out Amount and to hold such amount in trust to pay the obligations benefitting from the Carve-Out.

(v) Upon delivery of a Carve-Out Trigger Notice in accordance with sub-paragraph (ii) above, and prior to the payment to any Funded Debt Secured Party on account of any claim or administrative expense held by such person or entity (whether postpetition, super priority, adequate protection, prepetition, or otherwise), the Debtors shall deposit into the Escrow Account cash available on the Trigger Date (or available thereafter) in an aggregate amount equal to the Carve-Out Amount. The funds in the Escrow Account shall be available only to satisfy the obligations benefitting from the Carve-Out in Paragraph 7(i) above, and the Funded Debt Secured Parties (A) shall not sweep or foreclose on cash (including cash received as a result of the sale or other disposition of assets) of the Debtors unless and until the Escrow Account is funded in full in cash as provided above and (B) shall have a valid and perfected security interest upon any residual amount in the Escrow Account available following payment in full in cash of all obligations benefiting from the Carve-Out, subject to the lien and claim priorities set forth in this Final Order.

(vi) Notwithstanding anything to the contrary in this Final Order, the DIP Loan Documents, the Prepetition First Lien Loan Documents, and/or the Prepetition Second Lien Loan Documents (collectively, including this Final Order, the "Funded Debt Documents"), all claims and administrative expenses arising under, with respect to, or in connection with any Funded Debt Document (including the DIP Obligations, the DIP Superpriority Claims, the Prepetition First Lien

Obligations, the First Lien Adequate Protection Superpriority Claims, the Prepetition Second Lien Obligations, and the Second Lien Adequate Protection Superpriority Claims) and all security interests and liens securing such claims and administrative expenses (including the DIP Liens, the Prepetition First Liens, the First Lien Adequate Protection Liens, the Prepetition Second Liens and the Second Lien Adequate Protection Liens) shall, in each case, be subject and subordinate to the payment in full in cash of the Carve-Out.

(vii) Notwithstanding anything to the contrary in any Funded Debt Document, (a) the failure of the Escrow Account to satisfy in full the Allowed Professional Fees of the Professional Persons shall not affect, limit, or otherwise modify the scope or priority of the Carve-Out, (b) in no way shall any Approved Budget, the Carve-Out, the Carve-Out Amount, the Escrow Account, or any other budget or financial projection delivered in connection with any Funded Debt Document be construed as a cap or limitation on the amount of Allowed Professional Fees due and payable by the Debtors or that may be allowed by the Court at any time (including on an interim basis), and (c) the Debtors' authority to use proceeds from the DIP Facility, the DIP Collateral, and/or Cash Collateral on account of, and to timely pay, the Allowed Professional Fees and the other obligations benefitting from the Carve-Out shall in no way be limited or deemed limited by any Approved Budget (other than as expressly set forth above as to the Allowed Professional Fees for the Committee Professionals).

(viii) Prior to the occurrence of the Termination Declaration Date (as defined below), the Debtors shall be permitted to pay Allowed Professional Fees (including on an interim basis), and such payments shall not reduce or be deemed to reduce the Carve-Out. Moreover, for the avoidance of doubt, any amounts paid prior to the Carve-Out Trigger Notice shall not reduce or be deemed to reduce the Post-Carve-Out Trigger Notice Amount.

(ix) Reserved.

(x) Without affecting, limiting, or otherwise modifying the scope or priority of the Carve-Out, neither the DIP Secured Parties nor the Prepetition First Lien Secured Parties shall be responsible for the direct payment or reimbursement of any fees or disbursements of any of the Debtor Professionals, Committee Professionals or Committee members incurred in connection with the Chapter 11 Cases or any Successor Cases under any chapter of the Bankruptcy Code. Without affecting, limiting, or otherwise modifying the scope or priority of the Carve-Out, nothing in this Final Order or otherwise shall be construed (i) to obligate any DIP Secured Party or any Prepetition First Lien Secured Party in any way to pay compensation to, or to reimburse expenses of, any of the Debtor Professionals, the Committee Professionals or Committee members, or to guarantee that the Debtors or their estates have sufficient funds to pay such compensation or reimbursement or (ii) to increase the Carve-Out if actual allowed fees and expenses of any of the Debtor Professionals, Committee Professionals or Committee members are higher in fact than the Carve-Out Amount. Notwithstanding any provision in this Paragraph 7 to the contrary, no portion of the Carve-Out, Cash Collateral, Prepetition First Lien Collateral, DIP Collateral or proceeds of the DIP Facility shall be utilized for the payment of professional fees and disbursements to the extent restricted under Paragraph 16 hereof; provided that the foregoing shall not be construed as a cap or limitation on the amount of Allowed Professional Fees due and payable by the Debtors or that may be allowed by the Court at any time (including on an interim basis). Nothing herein shall be construed as consent to the allowance of any professional fees or expenses of any of the Debtors, any Committee, any other official or unofficial committee in these Chapter 11 Cases or any Successor Cases, or of any other person or entity, or shall affect the right of any DIP Secured Party

or any Prepetition First Lien Secured Party to object to the allowance and payment of any such fees and expenses.

8. **Waiver of 506(c) Claims**. In the case of the DIP Secured Parties (and their DIP Liens and their other rights in respect of the DIP Collateral, the Prepetition First Lien Collateral and Cash Collateral), the Prepetition First Lien Secured Parties (and their Prepetition First Liens and their other rights in respect of the DIP Collateral, the Prepetition First Lien Collateral and Cash Collateral) and the Prepetition Second Lien Secured Parties (and their Prepetition Second Liens and their other rights in respect of the DIP Collateral, the Prepetition Second Lien Collateral and Cash Collateral), and as a further condition of (i) the DIP Facility and any obligation of the DIP Secured Parties to make credit extensions pursuant to the DIP Loan Documents (and the consent of the DIP Secured Parties, the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties to the payment of the Carve-Out to the extent provided herein) and (ii) the Debtors' use of Cash Collateral pursuant to this Final Order, (a) no costs or expenses of administration of the Chapter 11 Cases or any Successor Cases shall be charged against or recovered from or against any or all of the DIP Secured Parties and/or the Prepetition First Lien Secured Parties, the Prepetition Second Lien Secured Parties, the Prepetition First Lien Collateral, the Prepetition Second Lien Collateral, the DIP Collateral and the Cash Collateral, in each case pursuant to section 506(c) of the Bankruptcy Code or otherwise, without the prior written consent of the DIP Agent, the Prepetition First Lien Agent and the Prepetition Second Lien Trustee, and (b) no such consent shall be implied from any other action, inaction, or acquiescence of any or all of the DIP Secured Parties, the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties, and (c) the exercise of any rights under section 506(c) of the Bankruptcy Code or otherwise to charge any costs or expense of administration of the Chapter 11 Cases or any

Successor Cases from or against the Prepetition First Lien Secured Parties or their Prepetition First Liens or the Prepetition Second Lien Secured Parties or their Prepetition Second Liens on or other interests in any or all of the DIP Collateral, the Prepetition First Lien Collateral, the Prepetition Second Lien Collateral and the Cash Collateral shall not impair and shall be subject to, and junior to, the DIP Liens on and the DIP Secured Parties' other interests in the DIP Collateral, the Prepetition First Lien Collateral, the Prepetition Second Lien Collateral and the Cash Collateral and the other DIP Protections accorded the DIP Secured Parties.

9. **After-Acquired Property**. Upon entry of this Final Order (but retroactive to the Petition Date), pursuant to section 552(a) of the Bankruptcy Code, all property acquired by the Debtors on or after the Petition Date is not, and shall not be, subject to any Lien of any person or entity resulting from any security agreement entered into by the Debtors prior to the Petition Date, except to the extent that such property constitutes proceeds of property of the Debtors that is subject to a valid, enforceable, perfected, and unavoidable Lien as of the Petition Date (or a valid, enforceable and unavoidable Lien that is perfected subsequent to the Petition Date solely to the extent permitted by section 546(b) of the Bankruptcy Code) that is not subject to subordination or avoidance under the Bankruptcy Code or other provisions or principles of applicable law.

10. **Protection of DIP Secured Parties' and Prepetition First Lien Secured Parties' Rights**.

(a) Unless the DIP Agent and the Prepetition First Lien Agent shall have provided their prior written consent or all DIP Obligations and First Lien Adequate Protection Superpriority Claims have been Paid in Full, there shall not be entered in any of these Chapter 11 Cases or any Successor Cases any order (including any order confirming any plan of reorganization or liquidation) that authorizes any of the following: (i) the obtaining of credit or the

incurring of indebtedness that is secured by a security, mortgage, or collateral interest or other Lien on all or any portion of the DIP Collateral or Prepetition First Lien Collateral and/or that is entitled to administrative priority status, in each case that is superior to or *pari passu* with the DIP Liens, the DIP Superpriority Claims, the Prepetition First Liens, the First Lien Adequate Protection Liens, the First Lien Adequate Protection Superpriority Claims, the Prepetition Second Liens, the Second Lien Adequate Protection Liens, the Second Lien Adequate Protection Superpriority Claims and/or the other DIP Protections; (ii) the use of Cash Collateral for any purpose other than Payment in Full of the DIP Obligations and the First Lien Adequate Protection Superpriority Claims or as otherwise permitted in the DIP Loan Documents and/or this Final Order; provided that the foregoing shall not affect, modify or limit the scope or priority of the Carve-Out, (iii) the return of goods pursuant to section 546(h) of the Bankruptcy Code (or other return of goods on account of any prepetition indebtedness) to any creditor of any Debtor or any creditor's taking any setoff against any of its prepetition indebtedness based upon any such return of goods pursuant to section 553 of the Bankruptcy Code or otherwise, or (iv) any modification of any of the DIP Secured Parties' or the Prepetition First Lien Secured Parties' rights under this Final Order, the DIP Loan Documents or the Prepetition First Lien Loan Documents with respect to any DIP Obligations.

(b) The Debtors shall, until all DIP Obligations, Prepetition First Lien Obligations and First Lien Adequate Protection Superpriority Claims have been Paid in Full, (i) maintain books, records, and accounts to the extent and as required by the DIP Loan Documents, (ii) reasonably cooperate with, consult with during normal business hours, and provide to the DIP Secured Parties and the Prepetition First Lien Secured Parties all such information and documents that any or all of the Debtors are obligated (including upon reasonable written request by any of

the DIP Secured Parties or the Prepetition First Lien Secured Parties) to provide under the DIP Loan Documents, the Prepetition Loan Documents (in the absence of the pendency of these Chapter 11 Cases) or the provisions of this Final Order, (iii) during normal business hours and upon reasonable written request, permit consultants, advisors and other representatives (including third party representatives) of each of the DIP Agent and the Prepetition First Lien Agent to visit and inspect any of the Debtors' respective properties, to examine and make abstracts or copies from any of their respective books and records, to tour the Debtors' business premises and other properties, and to discuss, and provide advice with respect to, their respective affairs, finances, properties, business operations, and accounts with their respective officers, employees, independent public accountants and other professional advisors (other than legal counsel) as and to the extent required by the DIP Loan Documents and/or the Prepetition First Lien Loan Documents, (iv) during normal business hours and upon reasonable written request, permit the DIP Agent and the Prepetition First Lien Agent and their respective consultants, advisors and other representatives to consult with the Debtors' management and advisors on matters concerning the Debtors' businesses, financial condition, operations and assets, and (v) during normal business hours and upon reasonable written request, permit the DIP Agent and the Prepetition First Lien Agent to conduct, at their discretion and at the Debtors' cost and expense, field audits, collateral examinations and inventory appraisals at reasonable times in respect of any or all of the DIP Collateral and the Prepetition First Lien Collateral. Notwithstanding anything to the contrary contained herein, the Debtors do not waive any right to attorney-client, work product, or similar privilege, and the Debtors shall not be required to provide the DIP Agent, the Prepetition First Lien Agent, or their respective counsel and financial advisors with any information subject to attorney-client privilege or consisting of attorney work product. For avoidance of doubt, the Prepetition

First Lien Agent shall have the same access and cooperation rights as the DIP Agent for purposes of this subparagraph (b).

11. **Proceeds of Subsequent Financing**. Without limiting the provisions and protections of Paragraph 10 above, if at any time prior to the Payment in Full of all the DIP Obligations (including subsequent to the confirmation of any chapter 11 plan or plans with respect to any of the Debtors), the Debtors' estates, any trustee, any examiner with enlarged powers, or any responsible officer subsequently appointed shall obtain credit or incur debt pursuant to sections 364(b), 364(c), 364(d), or any other provision of the Bankruptcy Code in violation of this Final Order or the DIP Loan Documents, then, after payment or reservation in full in cash of the Carve-Out, all of the cash proceeds derived from such credit or debt and all Cash Collateral shall immediately be turned over to the DIP Agent for application to the DIP Obligations until Paid in Full.

12. **Cash Collection**. From and after the date of the entry of this Final Order, all collections and proceeds of any DIP Collateral or Prepetition First Lien Collateral or services provided by any Debtor and all Cash Collateral that shall at any time come into the possession, custody, or control of any Debtor, or to which any Debtor is now or shall become entitled at any time, shall be promptly deposited in the same lock-box and/or deposit accounts into which the collections and proceeds of the Prepetition First Lien Collateral were deposited under the Prepetition First Lien Loan Documents (or in such other accounts as are designated by the DIP Agent from time to time) (collectively, the "Cash Collection Accounts"), which accounts shall be subject to the liens of the DIP Agent and the Prepetition First Lien Agent (and the funds in such accounts may be used by the Debtors to the extent provided in this Final Order and the DIP Loan Documents), subject to the ability of Bankruptcy Court to determine that any such cash is

unencumbered. Upon the direction of the DIP Agent or, following Payment in Full of the DIP Obligations, the Prepetition First Lien Agent, at any time after the occurrence of a Termination Event and subject to the provisions of Paragraph 7 and Paragraph 15, all proceeds in the Cash Collection Accounts shall be remitted to the DIP Agent for application to the DIP Obligations until Payment in Full and then to the Prepetition First Lien Agent for application to the Prepetition First Lien Obligations until Payment in Full, and the DIP Agent and the Prepetition First Lien Agent shall be entitled to take all action that is necessary or appropriate to effectuate the foregoing. Unless otherwise agreed to in writing by the DIP Agent and the Prepetition First Lien Agent, the Debtors shall maintain no accounts except those identified in the *Interim 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* (the "Interim Cash Management Order") and the *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* (the "Final Cash Management Order" together with the Interim Cash Management Order, the "Cash Management Orders").

13. **Disposition of DIP Collateral; Credit Bid**.

(a) Unless the DIP Obligations and the Prepetition First Lien Obligations are Paid in Full upon the closing of a sale or other disposition of the DIP Collateral or Prepetition First Lien Collateral, the Debtors shall not sell, transfer, lease, encumber, or otherwise dispose of any portion of the DIP Collateral or any Prepetition First Lien Collateral (or enter into any binding agreement to do so) without the prior written consent of the DIP Agent and the Prepetition First Lien Agent (and no such consent shall be implied from any other action, inaction, or acquiescence by any DIP Secured Party or Prepetition First Lien Secured Party or any order of this Court), except in the

ordinary course of business or as otherwise permitted in the DIP Loan Documents and/or the Prepetition First Lien Loan Documents, as applicable, and this Final Order. Except to the extent otherwise expressly provided in the DIP Loan Documents and subject to Paragraph 7 of this Final Order, all proceeds from the sale, transfer, lease, encumbrance or other disposition of any DIP Collateral outside the ordinary course of business shall be remitted to the DIP Agent for application to the DIP Obligations, in each case, in accordance with the terms of this Final Order and the DIP Loan Documents or the Prepetition First Lien Loan Documents, as the case may be. In addition, the Debtors are authorized and empowered to enter into such blocked account agreements (with cash dominion, if the DIP Agent so elects) with the DIP Agent and such financial institutions as the DIP Agent may require, and, if it so elects, the DIP Agent shall be entitled to enjoy the benefit of all control agreements to which the Prepetition First Lien Agent is a party without the need to enter into new blocked account agreements.

(b) The DIP Agent (or one or more of its designees, affiliates or assignees) shall have the unqualified right to credit bid any or all of the DIP Obligations under or pursuant to (i) section 363 of the Bankruptcy Code, (ii) any plan of reorganization or plan of liquidation under section 1129 of the Bankruptcy Code, or (iii) section 725 of the Bankruptcy Code. If the DIP Agent or its respective designees, affiliates or assignees makes a credit bid in connection with any auction or other sale process relating to the sale or other disposition of any DIP Collateral, then for purposes of such auction or sale process or any applicable order of this Court, the DIP Agent shall be automatically deemed to be a qualified bidder and its bid shall be automatically deemed to constitute a qualified bid, regardless of whether the qualified bidder or qualified bid requirements are satisfied.

14. **Termination Events**. The following shall constitute a termination event under this Final Order and the DIP Loan Documents unless waived in writing by each of the DIP Agent and the Prepetition First Lien Agent (each, a "Termination Event"):

(a) The occurrence and continuation of an "Event of Default" under the DIP Credit Agreement, as set forth therein (a "DIP Default Termination Event"), including, for avoidance of doubt, the Debtors' failure to timely and strictly comply with any of the obligations and deadlines set forth on **Exhibit A** hereto thereto (the "Chapter 11 Milestones").

(b) Any material breach by the Debtors of their obligations under the Restructuring Support Agreement (subject to any applicable cure periods), and any termination of the Restructuring Support Agreement by the Debtors or the Required Consenting First Lien Lenders (as defined in the Restructuring Support Agreement).

(c) Any other material breach, default or other violation by any of the Debtors of the terms and provisions of this Final Order (subject to any applicable cure periods).

15. **Rights and Remedies Upon Termination Event**.

(a) Upon the occurrence and during the continuation of a Termination Event, that has not been waived at the direction of the Required DIP Lenders, following delivery by the DIP Agent (at the direction of the Required DIP Lenders) of written notice (a "Remedies Notice"), of not less than five (5) Business Days' (the "Remedies Notice Period"), to the Debtors and Debtors' counsel, the United States Trustee, and counsel to the Committee (the "Remedies Notice Parties"), unless prior to such time the Court orders otherwise, the DIP Agent is hereby granted relief from the automatic stay, without further notice, hearing, motion, order or other action of any kind, to the extent necessary to permit the DIP Secured Parties to exercise (i) immediately upon the occurrence and during the continuance of any Termination Event, all rights and remedies under

this Final Order, the DIP Loan Documents and/or applicable non-bankruptcy law (other than those rights and remedies against the DIP Collateral as provided in subparagraph 15(b) below), including the right to (1) declare all DIP Obligations to be immediately due and payable, (2) declare the termination, reduction or restriction of any further commitment to extend credit to the Debtors, to the extent any such commitment remains, and/or (3) terminate the DIP Facility and any other DIP Loan Documents as to any future liability or obligation of the DIP Agent and the other DIP Secured Parties, but without affecting any of the DIP Obligations or the DIP Liens securing the DIP Obligations; and/or (ii) declare a termination, reduction or restriction on the ability of the Debtors to use any Cash Collateral (any such declaration under any of clauses 15(a)(i)(1), (2) or (3) or (ii) shall be made to the respective lead counsel to the Debtors, the Committee and the U.S. Trustee, and shall be referred to herein as a "Termination Declaration" and the date that is the earliest to occur of any such Termination Declaration being herein referred to as the "Termination Declaration Date").

(b) During the continuation of a Termination Event, that has not been waived at the direction of the Required Lenders, and following the delivery of a Remedies Notice, but prior to exercising the remedies set forth in this paragraph, the DIP Agent, on behalf of the DIP Secured Parties shall be required to file a motion with the Court seeking emergency relief (a "Stay Relief Motion") on not less than five (5) business days' notice to the Remedies Notice Parties (which may run concurrently with the Remedies Notice Period) for a further order of the Court modifying the automatic stay to permit the DIP Agent, on behalf of the DIP Secured Parties, to foreclose on, or otherwise enforce and realize on, its DIP Liens on all or any portion of the DIP Collateral, including by collecting accounts receivable and applying the proceeds thereof to the DIP Obligations, subject to the payment or reservation in full in cash of the Carve-Out as set forth in

Paragraph 7. Prior to the expiration of the Remedies Notice Period, the Remedies Notice Parties shall be entitled to request an emergency hearing with the Court. If a request for such hearing is made prior to the end of the Remedies Notice Period, then the Remedies Notice Period shall be continued until the Court hears and rules with respect thereto. During such Remedies Notice Period, (i) the Debtors may use Cash Collateral or any amounts previously or thereafter advanced under the DIP Credit Facility (a) to fund operations in accordance with the DIP Facility and the Approved Budget and (b) the Carve-Out; and (ii) the Debtors and the DIP Lenders consent to a hearing on an expedited basis to consider whether a Termination Event has occurred, and if a hearing to consider the foregoing is requested to be heard before the end of the Remedies Notice Period but is scheduled for a later date by the Bankruptcy Court, the Remedies Notice Period shall be automatically extended to the date of such hearing.

(c) Reserved.

(d) All proceeds realized in connection with the exercise of the rights and remedies of the DIP Secured Parties or the Prepetition First Lien Secured Parties shall be turned over first to the Debtors to fund the Carve-Out in full in cash, then to the DIP Agent for application to the DIP Obligations under, and in accordance with the provisions of, the DIP Loan Documents and this Final Order until Payment in Full of all of the DIP Obligations and then shall be held in escrow by the Debtors pending further order of this Court.

(e) Notwithstanding anything contained herein to the contrary and without limiting any other rights or remedies of the DIP Agent or the other DIP Secured Parties contained in this Final Order or the DIP Loan Documents, or otherwise available at law or in equity, and subject to the terms of the DIP Loan Documents, upon five (5) Business Days' written notice to the Debtors, the Committee, and any landlord, lienholder, licensor, or other third party owner of

any leased or licensed premises or intellectual property that a Termination Event has occurred and is continuing, and, in the case of subparagraph (i), subject to entry of an order of the Bankruptcy Court, on notice to the Debtors, the Committee, and the applicable landlord or licensor, authorizing such entry and the exercise of remedies, the DIP Agent (i) may, unless otherwise provided in any separate agreement by and between the applicable landlord or licensor and the DIP Agent (the terms of which shall be reasonably acceptable to the parties thereto), enter upon any leased or licensed premises of the Debtors for the purpose of exercising any remedy with respect to any DIP Collateral located thereon and (ii) shall be entitled to all of the Debtors' rights and privileges as lessee or licensee under the applicable license and to use any and all trademarks, trade names, copyrights, licenses, patents, or any other similar assets of the Debtors that are owned by or subject to a Lien of any third party and that are used by Debtors in their businesses, in the case of either subparagraph (i) or (ii) of this Paragraph 15(e) without interference from lienholders or licensors thereunder, subject to such lienholders' or licensors' rights under applicable law; provided, however, that the DIP Agent, on behalf of the DIP Secured Parties, shall pay only rent and additional rent, fees, royalties, or other monetary obligations of the Debtors that first arise after the written notice referenced above from the DIP Agent and that accrue during the period of such occupancy or use by such DIP Agent calculated on a *per diem* basis. Nothing herein shall require the Debtors, the DIP Agent, or the other DIP Secured Parties to assume any lease, license or other contract under Bankruptcy Code section 365(a) as a precondition to the rights afforded to the DIP Agent and the other DIP Secured Parties in this Paragraph 15(e).

(f) Subject to Payment in Full of the DIP Obligations, notwithstanding anything contained herein to the contrary, and without limiting any other rights or remedies of the Prepetition First Lien Agent or the other Prepetition First Lien Secured Parties contained in this

Final Order or the Prepetition First Lien Loan Documents, or otherwise available at law or in equity, the Prepetition First Lien Agent shall succeed to, and be entitled to, all of the rights, remedies, benefits and protections accorded to the DIP Agent pursuant to Paragraph 15(e), as if all references therein to the "DIP Agent" and the " DIP Parties" are references to the "Prepetition First Lien Agent" and the "Prepetition First Lien Secured Parties."

(g) The automatic stay imposed under section 362(a) of the Bankruptcy Code is hereby modified pursuant to the terms of this Final Order and the DIP Loan Documents as necessary to (i) permit the Debtors to grant the First Lien Adequate Protection Liens, the Second Lien Adequate Protection Liens and the DIP Liens and to incur all liabilities and obligations to the DIP Secured Parties and the Prepetition First Lien Secured Parties under the DIP Loan Documents, the DIP Facility, and this Final Order, (ii) subject to Paragraph 7, authorize the DIP Secured Parties and the Prepetition First Lien Secured Parties to retain and apply payments made in accordance with the DIP Loan Documents, the Prepetition First Lien Loan Documents and/or this Final Order, (iii) to permit each of the DIP Agent, the other DIP Secured Parties, the Prepetition First Lien Agent and the other Prepetition First Lien Secured Parties to perform any act authorized under this Final Order and the DIP Loan Documents, and (iv) otherwise to the extent necessary to implement and effectuate the provisions of this Final Order and the DIP Loan Documents.

16. **Restriction on Use of Proceeds**. Notwithstanding anything herein to the contrary, but subject to the last sentence of this Paragraph 16, no loans and/or proceeds from the DIP Facility (including the DIP Account), DIP Collateral, Cash Collateral (including any retainer held by any professionals for the below-referenced parties), Prepetition First Lien Collateral, Prepetition Second Lien Collateral or any portion of the Carve-Out may be used by (a) any Debtor, Committee or trustee or other estate representative appointed in the Chapter 11 Cases or any Successor Cases,

or any other person, party, or entity (including any of the Debtors' Professionals, the Committee's Professionals or the Committee members) to assert, join, commence, support, or prosecute any action for any claim, counter-claim, action, proceeding, application, motion, objection, defense, or other contested matter seeking any order, judgment, determination, or similar relief against the DIP Secured Parties (or to pay any professional fees and disbursements incurred in connection therewith) at any time; or (b) any Debtor, any Committee, or any trustee or other estate representative appointed in the Chapter 11 Cases or any Successor Cases, or any other person, party, or entity (including any of the Debtors' Professionals, the Committee's Professionals or the Committee members) to (or to pay any professional fees and disbursements incurred in connection therewith): (i) request authorization to obtain postpetition loans or other financial accommodations pursuant to section 364(c) or (d) of the Bankruptcy Code, or otherwise, other than from the DIP Secured Parties, or to seek any modification to this Final Order not approved by the DIP Agent and, to the extent such modification would affect the rights of any of the Prepetition First Lien Secured Parties, the Prepetition First Lien Agent and, to the extent such modification would affect the rights of any of the Prepetition Second Lien Secured Parties, the Prepetition Second Lien Trustee; (ii) assert, join, commence, support, or prosecute any action for any claim, counter-claim, action, proceeding, application, motion, objection, defense, or other contested matter seeking any order, judgment, determination, or similar relief against, any or all of the Prepetition First Lien Secured Parties, the Prepetition Second Lien Secured Parties, their respective affiliates, assigns or successors and the respective officers, directors, employees, agents, attorneys, representatives and other advisors of the foregoing, with respect to any transaction, occurrence, omission, action, or other matter (including formal or informal discovery proceedings in anticipation thereof), including (A) any Avoidance Actions or other actions arising under chapter 5 of the Bankruptcy

Code; (B) any action with respect to the validity, enforceability, priority, and extent of the DIP Obligations, the Prepetition First Lien Obligations, and/or the Prepetition Second Lien Obligations or the validity, extent, and priority of the DIP Liens, the Prepetition First Liens, the Prepetition Second Liens, the First Lien Adequate Protection Liens or the Second Lien Adequate Protection Liens; (C) any action seeking to invalidate, set aside, avoid, or subordinate, in whole or in part, the DIP Liens, the other DIP Protections, the Prepetition First Liens, the First Lien Adequate Protection Liens, the other Prepetition First Lien Adequate Protection, the Prepetition Second Liens, the Second Lien Adequate Protection Liens, or the other Prepetition Second Lien Adequate Protection; (D) any action preventing, hindering, or otherwise delaying any or all of the DIP Secured Parties', and, after the Payment in Full of the DIP Obligations, the Prepetition First Lien Secured Parties' and/or the Prepetition Second Lien Secured Parties', assertion, enforcement, or realization on the Cash Collateral, the DIP Collateral, the Prepetition First Lien Collateral or the Prepetition Second Lien Collateral in accordance with the DIP Loan Documents, the Prepetition First Lien Loan Documents or the Prepetition Second Lien Loan Documents, as applicable, or this Final Order; and/or (E) any action seeking to modify any of the rights, remedies, priorities, privileges, protections, and benefits granted to any or all of the DIP Secured Parties, the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties hereunder or under the DIP Loan Documents, the Prepetition First Lien Loan Documents or the Prepetition Second Lien Loan Documents, as applicable, or any payments made thereunder or in respect thereof; provided, however, the foregoing shall not apply to limit the investigation undertaken by the Debtors in connection with the Independent Investigation and, further, with respect to any investigation by the Committee up to $250,000 in the aggregate of the Carve-Out, any DIP Collateral, any Prepetition First Lien Collateral, any Prepetition Second Lien Collateral, any Cash Collateral and

proceeds of the DIP Facility may be used by the Committee (to the extent such Committee is appointed) to investigate (but not to prosecute) the claims and/or Liens of the Prepetition First Lien Agent and the other Prepetition First Lien Secured Parties under the Prepetition First Lien Loan Documents and/or the Liens of the Prepetition Second Lien Trustee and the other Prepetition Second Lien Secured Parties under the Prepetition Second Lien Loan Documents (but in any case not the claims and/or Liens of the DIP Agent and the other DIP Secured Parties); or (iii) use or seek to use Cash Collateral or sell or otherwise dispose of DIP Collateral or Prepetition First Lien Collateral, unless otherwise permitted hereby, without the prior written consent of the DIP Agent and the Prepetition First Lien Agent. For the avoidance of doubt, the foregoing limitations shall not (i) prevent or otherwise limit the Debtors and their professionals from being heard on whether a Termination Event has occurred and is continuing, (ii) be construed as a cap or limitation on the amount of Allowed Professional Fees due and payable by the Debtors or that may be allowed by the Court at any time (including on an interim basis), or (iii) prohibit the Debtors' use of the DIP Collateral, Prepetition First Lien Collateral, DIP Loans, Cash Collateral, proceeds of any of the foregoing, any portion of the Carve-Out or any other funds to respond to investigations by the Committee.

17. **Proofs of Claim**. The Prepetition First Lien Secured Parties, and the Prepetition Second Lien Secured Parties will not be required to file proofs of claim in any of the Chapter 11 Cases or Successor Cases for any claim allowed herein. Paragraphs D and E shall be deemed to constitute a timely filed proof of claim for the Prepetition First Lien Secured Parties and the Prepetition Second Lien Secured Parties in respect of all Prepetition First Lien Obligations and Prepetition Second Lien Obligations, respectively. In addition, the Prepetition First Lien Secured Parties, the Prepetition Second Lien Secured Parties, and the DIP Secured Parties will not be

required to file any request for allowance and/or payment of any administrative expenses, and this Final Order shall be deemed to constitute a timely filed request for allowance and/or payment of any Prepetition First Lien Obligations or Prepetition Second Lien Obligations constituting administrative expenses or any DIP Obligations, as applicable. Notwithstanding any order entered by this Court in relation to the establishment of a bar date in any of the Chapter 11 Cases or Successor Cases to the contrary, each of the Prepetition First Lien Agent, for the benefit of itself and the other Prepetition First Lien Secured Parties, the Prepetition Second Lien Trustee, for the benefit of itself and the other Prepetition Second Lien Secured Parties, and the DIP Agent, for the benefit of itself and the other DIP Secured Parties, is hereby authorized and entitled, in its sole discretion, but not required, to file (and amend and/or supplement, in its discretion) in each of the Chapter 11 Cases or Successor Cases (i) in the case of Prepetition First Lien Agent, a proof of claim and/or aggregate proofs of claim in respect of any Prepetition First Lien Obligations, (ii) in the case of the Prepetition Second Lien Trustee, a proof of claim and/or aggregate proofs of claim in respect of any Prepetition Second Lien Obligations, and (ii) in the case of each of the Prepetition First Lien Agent, Prepetition Second Lien Trustee, and the DIP Agent, a request or aggregate requests for allowance and/or payment of any portion of the Prepetition First Lien Obligations constituting administrative expenses or any DIP Obligations, as applicable.

18. **Preservation of Rights Granted Under the Final Order**.

(a) No Non-Consensual Modification or Extension of Final Order. The Debtors shall not seek any amendment, modification, or extension of this Final Order (including through any chapter 11 plan of reorganization) without the prior written consent of the DIP Agent and the Prepetition First Lien Agent, and no such consent shall be implied by any other action, inaction, or acquiescence of the DIP Secured Parties or any of the Prepetition First Lien Secured

Parties. In the event any or all of the provisions of this Final Order are hereafter modified, amended, or vacated by a subsequent order of this Court or any other court, such modification, amendment, or vacatur shall not affect the validity, perfection, priority, allowability, enforceability, or non-avoidability of any advances, payments, or use of cash authorized or made hereby or pursuant to the DIP Loan Documents, or Lien, claim, priority or other DIP Protections authorized or created hereby or pursuant to the DIP Loan Documents, in each case incurred or arising prior to the actual receipt of written notice by the DIP Agent or the Prepetition First Lien Agent, as applicable, and in either case counsel thereto, of the effective date of such reversal, modification, vacatur, or stay. Based on the findings set forth in this Final Order and in accordance with section 364(e) of the Bankruptcy Code, which is applicable to the DIP Facility, in the event any or all of the provisions of this Final Order are hereafter reversed, modified, vacated, or stayed by a subsequent order of this Court or any other court, the DIP Secured Parties and the Prepetition First Lien Secured Parties shall be entitled to the protections provided in section 364(e) of the Bankruptcy Code, and notwithstanding any such reversal, modification, vacatur, or stay, any use of Cash Collateral or any DIP Obligations or any DIP Protections (including the Prepetition First Lien Adequate Protection) incurred or granted by the Debtors prior to the actual receipt of written notice by the DIP Agent or the Prepetition First Lien Agent, as applicable, of the effective date of such reversal, modification, vacatur, or stay shall remain in full force and effect and be binding on all parties in interest and be governed in all respects by the original provisions of this Final Order (and shall maintain their respective priorities as provided by this Final Order), and the DIP Secured Parties and the Prepetition First Lien Secured Parties shall be entitled to all of the DIP Protections (including the Prepetition First Lien Adequate Protection) and all other rights, remedies, Liens,

priorities, privileges, protections, and benefits granted pursuant to section 364(e) of the Bankruptcy Code, this Final Order, or the DIP Loan Documents.

(b) Dismissal. If any order dismissing any of the Chapter 11 Cases under section 1112 of the Bankruptcy Code or otherwise is at any time entered, then notwithstanding any such dismissal, (i) the DIP Protections (including the Prepetition First Lien Adequate Protection) and all other rights, remedies, Liens, priorities, privileges, protections, and benefits granted to any or all of the DIP Secured Parties and the Prepetition First Lien Secured Parties, respectively, shall remain in full force and effect and be binding on all parties in interest and be governed in all respects by the provisions of this Final Order (and shall maintain their respective priorities as provided by this Final Order) until all DIP Obligations and all Prepetition First Lien Obligations have been Paid in Full, and such order of dismissal shall so provide (in accordance with sections 105 and 349 of the Bankruptcy Code), and (ii) this Court shall retain jurisdiction, notwithstanding such dismissal, for the purposes of enforcing such DIP Protections (including the Prepetition First Lien Adequate Protection) and all other rights, remedies, Liens, priorities, privileges, protections, and benefits granted to any or all of the DIP Secured Parties and the Prepetition First Lien Secured Parties, respectively.

(d) Survival of Final Order. The provisions of this Final Order and the DIP Loan Documents, any actions taken pursuant hereto or thereto, and all of the DIP Protections (including the Prepetition First Lien Adequate Protection), and all other rights, remedies, Liens, priorities, privileges, protections, and benefits granted to any or all of the DIP Secured Parties and the Prepetition First Lien Secured Parties, respectively, pursuant to this Final Order and the DIP Loan Documents shall survive, and shall not be modified, impaired, or discharged by, the entry of any order confirming any plan of reorganization in any Chapter 11 Case or Successor Case,

converting any Chapter 11 Case to a case under chapter 7, dismissing any of the Chapter 11 Cases, withdrawing of the reference of any of the Chapter 11 Cases or any Successor Cases or providing for abstention from handling or retaining of jurisdiction of any of the Chapter 11 Cases or any Successor Case in this Court, or terminating the joint administration of these Chapter 11 Cases or any Successor Case or by any other act or omission. The terms and provisions of this Final Order, including all of the DIP Protections (including the Prepetition First Lien Adequate Protection) and all other rights, remedies, Liens, priorities, privileges, protections, and benefits granted to any or all of the DIP Secured Parties and the Prepetition First Lien Secured Parties, respectively, pursuant to this Final Order and the DIP Loan Documents shall continue in full force and effect and be binding on all parties in interest notwithstanding the entry of any such order, and such DIP Protections (including the Prepetition First Lien Adequate Protection), and such other rights, remedies, Liens priorities, privileges, protections and benefits pursuant to this Final Order and the DIP Loan Documents, shall continue in full force and effect in these proceedings and in any Successor Cases and after dismissal of any thereof, and shall maintain their respective priorities as provided by this Final Order. Without the express written consent of the DIP Lenders, the DIP Obligations shall not be discharged by the entry of an order confirming any such chapter 11 plan, the Debtors having waived such discharge pursuant to section 1141(d)(4) of the Bankruptcy Code.

19. **Insurance Policies**. Upon entry of this Final Order, the DIP Agent, the other DIP Secured Parties, the Prepetition First Lien Agent (with respect to the Prepetition First Lien Adequate Protection) and the other Prepetition First Lien Secured Parties (with respect to the Prepetition First Lien Adequate Protection) shall be, and shall be deemed to be, without any further action or notice, named as additional insureds and loss payees, as applicable, on each insurance policy maintained by the Debtors that in any way relates to the DIP Collateral, and the Debtors

shall take such actions as are reasonably requested by the DIP Agent or the Prepetition First Lien Agent from time to time to evidence or effectuate the foregoing.

20. **Other Rights and Obligations**.

(a) Expenses. To the extent provided in the DIP Loan Documents (and without limiting the Debtors' respective obligations thereunder), the applicable Debtors shall pay all reasonable expenses incurred by the DIP Agent (including the reasonable fees and disbursements of all counsel for the DIP Agent and any internal or third-party appraisers, consultants, advisors and auditors engaged by or for the benefit of the DIP Agent and/or its counsel) in connection with the preparation, execution, delivery, and administration of the DIP Loan Documents, the Interim Order, this Final Order, and any other agreements, instruments, pleadings, or other documents prepared or reviewed in connection with any of the foregoing, whether or not any or all of the transactions contemplated hereby or by the DIP Loan Documents are consummated.

(b) Notice of Professional Fees. Professionals for the DIP Agent and the Prepetition First Lien Agent (including professionals engaged by counsel to the DIP Agent or Prepetition First Lien Agent, as applicable) (collectively, the "Lender Professionals") shall not be required to comply with the United States Trustee fee guidelines or submit invoices to this Court, United States Trustee, any Committee or any other party in interest. Copies of summary invoices submitted to the Debtors by such Lender Professionals shall be forwarded by the Debtors to the United States Trustee, counsel for any Committee, and such other parties as this Court may direct. If no objection to payment of the requested fees and expenses is made in writing (email being sufficient) by any of the Debtors, any Committee, or the United States Trustee within ten calendar days after delivery of such invoices, such invoices shall be promptly paid by the Debtors and, in any event, no later than three Business Days after expiration of such ten day period. The summary

invoices shall be sufficiently detailed to enable a determination as to the reasonableness of such fees and expenses; provided, however, that such summary invoices may be redacted to the extent necessary to delete any information subject to the attorney-client privilege, any information constituting attorney work product, or any other confidential information, and the provision of such summary invoices shall not constitute any waiver of the attorney-client privilege or of any benefits of the attorney work product doctrine or other applicable privilege. If the Debtors, United States Trustee or any Committee object to the reasonableness of the fees and expenses of any of the Lender Professionals and cannot resolve such objection within ten days of receipt of such invoices, then the Debtors, United States Trustee, or the Committee, as the case may be, shall file with this Court and serve on such Lender Professionals an objection (the "Fee Objection") limited to the issue of the reasonableness of such fees and expenses, and any failure by any such party to file a Fee Objection within such ten day period shall constitute a waiver of any right of such party to object to the applicable invoice. Notwithstanding any provision herein to the contrary, any objection to, and any hearing on an objection to, payment of any fees, costs, and expenses set forth in a professional fee invoice in respect of Lender Professionals shall be limited to the reasonableness of the particular items or categories of the fees, costs, and expenses that are the subject of such objection. The Debtors shall timely pay in accordance with the terms and conditions of this Final Order (a) the undisputed fees, costs, and expenses reflected on any invoice to which a Fee Objection has been timely filed and (b) all fees, costs and expenses on any invoice to which no Fee Objection has been timely filed. All such unpaid fees, costs, expenses, and charges of the DIP Agent that have not been disallowed by this Court on the basis of an objection filed by the Debtor, the United States Trustee or the Committee (or any subsequent trustee of the Debtors'

estates) in accordance with the terms hereof shall constitute DIP Obligations and shall be secured by the DIP Collateral as specified in this Final Order.

(c) Binding Effect. The provisions of this Final Order, including all findings herein, and the DIP Loan Documents shall be binding upon all parties in interest in these Chapter 11 Cases and any Successor Cases, including the DIP Secured Parties, the Prepetition First Lien Secured Parties, any Committee, and the Debtors and their respective estates, successors and assigns (including any chapter 7 or chapter 11 trustee hereinafter appointed or elected for the estate of any of the Debtors, an examiner appointed pursuant to section 1104 of the Bankruptcy Code, or any other fiduciary or responsible person appointed as a legal representative of any of the Debtors or with respect to the property of the estate of any of the Debtors), whether in any of the Chapter 11 Cases, in any Successor Cases, or upon dismissal of any such Case or Successor Case; provided, however, that except to the extent expressly provided in Paragraph 7, the DIP Secured Parties and the Prepetition First Lien Secured Parties shall have no obligation to permit the use of Cash Collateral or to extend any financing to any chapter 7 or chapter 11 trustee or other responsible person appointed for the estates of the Debtors in any Chapter 11 Case or Successor Case.

(d) No Waiver. The failure of the Prepetition First Lien Secured Parties or the DIP Secured Parties to seek relief or otherwise exercise their rights and remedies under this Final Order, the Prepetition First Lien Loan Documents, the DIP Loan Documents or otherwise (or any delay in seeking or exercising same) shall not constitute a waiver of any of such parties' rights hereunder, thereunder, or otherwise. Nothing contained in this Final Order (including the authorization of the use of any Cash Collateral) shall impair or modify any rights, claims, or defenses available in law or equity to any Prepetition First Lien Secured Party or any DIP Secured Party, including rights of a party to a swap agreement, securities contract, commodity contract,

forward contract, or repurchase agreement with a Debtor to assert rights of setoff or other rights with respect thereto as permitted by law (or the right of the Debtors to contest or object to such assertion). Except as provided by this Final Order, the entry of this Final Order is without prejudice to, and does not constitute a waiver of, expressly or implicitly, or otherwise impair, any right or ability of the Prepetition First Lien Secured Parties or the DIP Secured Parties under the Bankruptcy Code or under non-bankruptcy law to (i) request conversion of the Chapter 11 Cases or any Successor Cases to cases under chapter 7, dismissal of the Chapter 11 Cases or any Successor Cases, or the appointment of a trustee or examiner in the Chapter 11 Cases or any Successor Cases, or to oppose the use of Cash Collateral in any Successor Case, (ii) propose, subject to the provisions of section 1121 of the Bankruptcy Code, any chapter 11 plan or plans with respect to any of the Debtors or seek early termination of the Debtors' exclusive rights to propose a plan under the Bankruptcy Code, or (iii) exercise any of the rights, claims, or privileges (whether legal, equitable, or otherwise) of the DIP Secured Parties or the Prepetition First Lien Secured Parties, respectively, under the DIP Loan Documents or the Prepetition First Lien Loan Documents, the Bankruptcy Code or otherwise, in each case with the rights of the Debtors to contest or object thereto reserved. Except to the extent otherwise expressly provided in this Final Order or by law, neither the commencement of the Chapter 11 Cases nor the entry of this Final Order shall limit or otherwise modify the rights and remedies of the Prepetition First Lien Secured Parties under the Prepetition First Lien Loan Documents or with respect to any non-Debtor entities or their respective assets, whether such rights and remedies arise under the Prepetition First Lien Loan Documents, applicable law, or equity.

(e) No Third Party Rights. Except as explicitly provided for herein or in any DIP Loan Document, this Final Order does not create any rights for the benefit of any third party,

creditor, equity holder, or direct, indirect, or incidental beneficiary. In determining to make any loan (whether under the DIP Credit Agreement or otherwise) or to permit the use of Cash Collateral or in exercising any rights or remedies as and when permitted pursuant to this Final Order or the DIP Loan Documents, the DIP Secured Parties and the Prepetition First Lien Secured Parties shall not (i) be deemed to be in control of the operations of the Debtors or to be acting as a "responsible person" or "owner or operator" with respect to the operation or management of the Debtors (as such terms, or any similar terms, are used in the United States Comprehensive Environmental Response, Compensation and Liability Act, as amended, or any similar federal, state or local statute or regulation) or (ii) owe any fiduciary duty to the Debtors, their respective creditors, shareholders, or estates.

(f) No Marshaling. Neither the DIP Secured Parties nor the Prepetition First Lien Secured Parties shall be subject to the equitable doctrine of "marshaling" or any other similar doctrine with respect to any of the DIP Collateral or the Prepetition First Lien Collateral, as applicable; *provided*, that the proceeds of (i) Avoidance Actions and (ii) any other assets that do not constitute Prepetition First Lien Collateral may only be applied in satisfaction of the DIP Obligations or First Lien Adequate Protection Superpriority Claims after the DIP Secured Parties and Prepetition First Lien Secured Parties have used commercially reasonable efforts to seek payment from all other DIP Collateral and Prepetition First Lien Collateral.

(g) Amendments. The Debtors are authorized and empowered, without further notice and hearing or approval of this Court, to amend, modify, supplement, or waive any provision of the DIP Loan Documents in accordance with the provisions thereof, in each case unless such amendment, modification, supplement, or waiver is material; *provided*, that the Committee shall be given at least two (2) business days' prior written notice of any such amendment with an

opportunity to object and seek resolution by the Court of any such objection (which shall toll the effectiveness of such proposed amendment until resolved). No waiver, modification, or amendment of any of the provisions of the DIP Loan Documents shall be effective unless set forth in writing, signed by or on behalf of the Borrower and the DIP Agent (after having obtained the approval of the requisite DIP Secured Parties under the DIP Credit Agreement) and, except as provided herein, approved by this Court. Notwithstanding the foregoing, no waiver, modification or amendment of any of the provisions of this Final Order or the DIP Loan Documents that would directly and adversely affect the rights or interests of the Prepetition First Lien Secured Parties, as applicable, shall be effective unless also consented to in writing by the Prepetition First Lien Agent on behalf of the Prepetition First Lien Secured Parties (after obtaining the approval of the requisite Prepetition First Lien Secured Parties under the Prepetition First Lien Credit Agreement).

(h) Committee Reporting Obligations. The Debtors shall deliver to the Committee all information, reports, documents and other material that the Debtors provide to the DIP Secured Parties pursuant to the DIP Loan Documents.

(i) Inconsistency. In the event of any inconsistency between the terms and conditions of the DIP Loan Documents and of this Final Order, the provisions of this Final Order shall govern and control. In the event of any inconsistency between the terms or conditions of this Final Order and the terms or conditions of any other order entered by this Court in the nature of a "first day order", the provisions of this Final Order shall govern and control.

(j) Enforceability. This Final Order shall constitute findings of fact and conclusions of law pursuant to the Bankruptcy Rule 7052 and shall take effect and be fully enforceable *nunc pro tunc* to the Petition Date immediately upon execution hereof. Notwithstanding Bankruptcy Rules 4001(a)(3), 6004(h), 6006(d), 7062 or 9024 or any other

Bankruptcy Rule, or Rule 62(a) of the Federal Rules of Civil Procedure, this Final Order shall be immediately effective and enforceable upon its entry, and there shall be no stay of execution or effectiveness of this Final Order.

(k) Reservation of Rights. Nothing in this Final Order shall be deemed to constitute the consent of the DIP Secured Parties or the Prepetition First Lien Secured Parties, and except as expressly provided in the DIP Loan Documents, each of the foregoing expressly reserve the right to object, to entry of any Order of the Bankruptcy Court that provides for the sale or other disposition of all or substantially all of the assets of the Debtors (or any other sale or other disposition of assets of any of the Debtors outside the ordinary course of business) to any party unless, in connection and concurrently with any such event, the proceeds of such sale are or will be sufficient to satisfy Payment in Full of the DIP Obligations and the Prepetition First Lien Obligations on the closing date of such sale.

(l) Headings. Paragraph headings used herein are for convenience only and are not to affect the construction of, or to be taken into consideration in, interpreting this Final Order.

21. **Necessary Action**. The Debtors are authorized to take any and all such actions as are necessary, required or appropriate to implement and effectuate the terms of this Final Order, the DIP Loan Documents and the transactions contemplated hereunder and thereunder.

22. **Retention of Jurisdiction**. This Court has and will retain jurisdiction to enforce this Final Order according to its terms.

23. **Specific Provisions.**

(a) Chubb Reservation of Rights. For the avoidance of doubt, (i) the Debtors shall not grant liens and/or security interests in any property held by ACE American Insurance Company

and Federal Insurance Company and each of their U.S.-based affiliates and predecessors (collectively, and solely in their roles as insurers, "Chubb") or any insurance policy issued by Chubb; (ii) this Final Order does not grant the Debtors any right to use any property (or the proceeds thereof) held by Chubb as collateral to secure obligations under any insurance policies and related agreements; (iii) the proceeds of any insurance policy issued by Chubb shall only be considered to be DIP Collateral to the extent such proceeds are paid to the Debtors pursuant to the terms of any such applicable insurance policy; and (iv) nothing in the Interim Order, this Final Order, or the DIP Loan Documents or any document related thereto (collectively, the "DIP Documents") alters or modifies the terms and conditions of any insurance policies or related agreements.

(b) Statement Regarding Applied Surety Underwriters. Nothing in the DIP Documents shall waive, alter, limit, modify, and/or release any rights, claims, liens, and/or interest of Applied Surety Underwriters and/or any of the companies for which Applied Surety Underwriters underwrites surety bonds, including, without limitation, SiriusPoint America Insurance Company, Intact Insurance Group, and Atlantic Specialty Insurance Company (collectively, "Applied") with respect to any bonds issued by Applied on behalf of the Debtors (the "Applied Bonds"), any of Applied's indemnity agreements relating to the Applied Bonds (each an "Applied Indemnity Agreement" and collectively, the "Applied Indemnity Agreements"), and any and all collateral of Applied, or the proceeds thereof (the "Applied Collateral"). Nothing in the DIP Documents shall alter, limit, waive, and/or release any rights, liens, claims, and/or interests of the Debtors in respect of the Applied Bonds, the Applied Indemnity Agreements, and/or the Applied Collateral. For the avoidance of doubt, to the extent Applied has a Prepetition Prior Lien, Applied's rights and interests in the Applied Collateral shall not be a Primed Lien.

(c) Westchester Fire Insurance Company. Nothing in the DIP Documents, shall in any way prime, or negatively affect the rights of Westchester Fire Insurance Company and Federal Insurance Company or their past, present, or future parents, subsidiaries, and surety affiliates (individually and collectively referred to as the "Surety" (and in their capacities as such)) as to: (a) any funds it is holding and/or being held for it presently or in the future, whether in trust, as security, or otherwise, including, but not limited to, by any of the Debtors in relation to contracts or obligations bonded by the Surety; (b) any substitutions or replacements of said funds, including accretions to and interest earned on said funds; or (c) any letter of credit or cash collateral, related to any indemnity, collateral trust, bond, or agreements, provided it/they are between, among, or involve the Surety and any of the Debtors (including both the Cash Collateral Agreement dated June 16, 2025 between the Surety and ModivCare, Inc. fka Providence Service Corporation, and the Cash Collateral Agreement dated September 4, 2025 between the Surety and ModivCare, Inc., whereby the Surety is holding approximately $7.3 million), (collectively (a) through (c), the "Surety Assets"). Nothing in the DIP Documents shall negatively affect the rights of the Surety under any current or future indemnity, collateral trust, or related agreements between or involving the Surety and any of the Debtors as to the Surety Assets, including but not limited to, the two Agreements of Indemnity executed by (a) non-debtor Charter LCI Corporation and LogisticCare, Inc. (now Debtor ModivCare Solutions, LLC), on or about February 6, 2009, in favor of the Surety, and (b) Providence Services Corporation (now Debtor ModivCare Inc.), on or about February 21, 2008 in favor of the Surety, as well as an agreement of indemnity executed by ModivCare Solutions, LLC and ModivCare Inc. in favor of the Surety, on September 2, 2025. In addition, nothing in the DIP Documents shall prime or affect: (x) current or future setoff and/or recoupment rights and/or the lien rights of the Surety or of any party to whose rights the Surety

has or may become subrogated; and/or (y) any existing or future subrogation or other common law rights of the Surety.

(d) Nothing herein is an admission by the Surety or the Debtors, or a determination by the Bankruptcy Court, regarding any claims against any bonds, and the rights, remedies, and defenses of the Surety and the Debtors (or any successors in interest to any of the Debtors), and any creditors in connection therewith, are expressly reserved and preserved. Notwithstanding anything in the DIP Documents to the contrary, and subject to the terms herein, the Debtors hereby agree that, during the pendency of these proceedings, the Debtors shall, in accordance with and subject to applicable law and any current or future indemnity, collateral trust, or related agreements, reimburse the Surety for reasonable and documented attorneys' fees and costs incurred and to be incurred by the Surety, without the Surety having to file a fee application, proof of claim and/or request for payment. The Surety's right to object to any proposed assignment of any bonds issued by the Surety or any indemnity agreement signed by the Surety and any of the Debtors is hereby fully preserved.

Signed: October 06, 2025

Alfredo R Pérez
United States Bankruptcy Judge

SCHEDULE 1

LIEN/CLAIM PRIORITIES

Priority	DIP Collateral	Priority Claims
First	Carve-Out	Carve-Out
Second	Permitted Prior Liens	DIP Superpriority Claims
Third	DIP Liens	First Lien Adequate Protection Superpriority Claims (subject to payment in full of the DIP Obligations)
Fourth	First Lien Adequate Protection Liens	Second Lien Adequate Protection Superpriority Claims (subject to payment in full of the DIP Obligations and the Prepetition First Lien Obligations)
Fifth	Prepetition First Liens	-
Sixth	Second Lien Adequate Protection Liens	-
Seventh	Prepetition Second Liens	-

EXHIBIT A

CHAPTER 11 MILESTONES

1. As of 11:59 p.m. prevailing Eastern Time on October 6, 2025, the Court shall have entered an order approving a disclosure statement with respect to solicitation of the Plan (as defined in the Restructuring Support Agreement);

2. As of the 11:59 p.m. prevailing Eastern Time on November 18, 2025, the Court shall have entered a confirmation order providing for confirmation of the Plan; and

3. As of the 11:59 p.m. prevailing Eastern Time on December 8, 2025, the effective date of the Plan shall have occurred.

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

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

APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The Official Committee of Unsecured Creditors (the "**Committee**") of the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") in the above-captioned chapter 11 cases hereby submits this application (the "**Application**"), pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "**Bankruptcy Code**"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and rules 2014-1, 2016-1 and 9013-1

[1] A complete list of each of the Debtors in the 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.

of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Southern District of Texas (the "**Local Rules**"), for the entry of an order (the "**Order**"), substantially in the form attached hereto as **Exhibit A**, authorizing the Committee to employ and retain White & Case LLP ("**White & Case**"), effective as September 9, 2025, as counsel to the Committee. In support of this Application, the Committee relies upon and incorporates by reference the *Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (the "**Pesce Declaration**"), attached hereto as **Exhibit B**, and the *Declaration of David Rowe in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (the "**Committee Declaration**" and, together with the Pesce Declaration, the "**Declarations**"), attached hereto as **Exhibit C**. In further support of the Application, the Committee respectfully states as follows:

RELIEF REQUESTED

1. By this Application, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rules 2014-1, 2016-1, and 9013-1, the Committee seeks authority to retain and employ White & Case as its bankruptcy counsel in connection with these Chapter 11 Cases and all related matters, effective as of September 9, 2025.

JURISDICTION, VENUE AND PREDICATES FOR RELIEF

2. The United States Bankruptcy Court for the Southern District of Texas (the "**Court**") has jurisdiction to consider this Application under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue of these Chapter 11 Cases is proper in this district under 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested by this Application are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rules 2014-1, 2016-1, and 9013-1.

BACKGROUND

4. On August 20, 2025 (the "**Petition Date**"), the Debtors filed with the Court a voluntary petition for relief under the Bankruptcy Code. The Debtors continue to operate their business and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases.

5. On September 5, 2025, the Office of the United States Trustee for Region 7 (the "**U.S. Trustee**") appointed the Committee, pursuant to section 1102(a) of the Bankruptcy Code, to represent the interests of all creditors holding unsecured claims in these Chapter 11 Cases. [Docket No. 124]. As of the date hereof, the members of the Committee are: (i) Wilmington Savings Fund Society, FSB, as indenture trustee for the Unsecured Notes;[2] (ii) Madison Avenue International LP; (iii) Jupiter Asset Management; (iv) Uber Health, LLC; (v) MedEx Medical Transport Service, Inc.; (vi) Randstad North America; and (vii) Marquis Hines.

6. On September 9, 2025, the Committee voted to retain White & Case as its counsel, subject to Bankruptcy Court approval.

QUALIFICATIONS OF WHITE & CASE

7. White & Case is proposed to serve as counsel to the Committee to perform all of the services that are necessary and appropriate to discharge the Committee's responsibilities and

[2] On August 24, 2021, Debtor ModivCare Escrow Issuer, Inc. issued $500 million aggregate principal amount of 5.00% senior unsecured notes due October 1, 2029 (the "**Unsecured Notes**").

further the interests of the Committee's constituents in these Chapter 11 Cases, subject to approval by the Court.

8. Since being selected, White & Case has worked closely with the Committee and its other professionals with respect to these Chapter 11 Cases. The Committee selected White & Case to serve as its counsel based in part upon the firm's extensive knowledge, experience, and expertise in representing stakeholders in chapter 11 cases, including in healthcare cases. White & Case also has extensive expertise in other fields of law that are implicated by these Chapter 11 Cases, including, among others, corporate law, commercial litigation, banking and finance law, capital markets, and tax law. Given the firm's experience and knowledge in these fields, White & Case is well qualified and uniquely able to act on the Committee's behalf in connection with these Chapter 11 Cases.

SERVICES TO BE RENDERED

9. The Committee has selected White & Case to serve as counsel to the Committee to perform all of the services that are necessary and appropriate to discharge the Committee's responsibilities and further the interests of the Committee's constituents in these Chapter 11 Cases.

10. Subject to further order of this Bankruptcy Court, White & Case will provide the following services:

(a) advise the Committee regarding its rights, powers, and duties under the Bankruptcy Code and in connection with these Chapter 11 Cases;

(b) assist and advise the Committee in its consultations and negotiations with the Debtors concerning the administration of these Chapter 11 Cases;

(c) assist and advise the Committee in its examination, investigation, and analysis of the acts, conduct, assets, liabilities, and financial condition of the Debtors, including (without limitation) reviewing and investigating prepetition transactions, the operation of the Debtors' business, and the value of such business;

(d) assist the Committee in the review, analysis, and negotiation of any chapter 11 plan(s) that have been or may be filed and assist the Committee in the review, analysis, and negotiation of the disclosure statement accompanying any chapter 11 plan(s);

(e) take all necessary action to protect and preserve the interests of the Committee and creditors holding general unsecured claims against the Debtors' estates, including (i) the investigation and possible prosecution of actions enhancing the Debtors' estates including any potential challenges to the scopes of the prepetition security interests of the Company's first lien lenders, and (ii) review and analysis of claims filed against the Debtors' estates;

(f) review and analyze motions, applications, orders, statements of operations, and schedules filed with the Bankruptcy Court and advise the Committee as to their propriety;

(g) prepare on behalf of the Committee all necessary pleadings, applications, memoranda, orders, reports, and other papers, in support of positions taken by the Committee;

(h) represent the Committee at all court hearings, statutory meetings of creditors, and other proceedings before this Court;

(i) assist the Committee in the review, analysis, and negotiation of any financing agreements;

(j) assist and advise the Committee as to its communications with its constituents regarding significant matters in these Chapter 11 Cases, including but not limited to, communications required under section 1102(b)(3) of the Bankruptcy Code; and

(k) perform such other legal services as required or otherwise deemed to be in the interests of the Committee in connection with these Chapter 11 Cases.

PROFESSIONAL COMPENSATION

11. White & Case has agreed to serve as counsel to the Committee and receive compensation and reimbursement in accordance with its standard billing practices for services rendered and expenses incurred on behalf of the Committee, in accordance with sections 328, 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and as otherwise ordered by the Bankruptcy Court.

12. White & Case will charge its then current standard rate for the professional services that it has provided to date and will provide in the future. Currently, the hourly rates charged by White & Case in its U.S. offices range from $1,690 to $2,500 for partners, $1,630 for counsel, $870 to $1,580 for associates, and $355 to $700 for paraprofessionals. White & Case has advised the Committee that the hourly rates set forth above are subject to periodic review and adjustment in the normal course of the Firm's business, typically on January 1st of each year, and often due to the increased experience of a particular professional. Such adjustments were last made in January 2025. In the event that its billing rates increase, White & Case will provide notice of any rate increases in the fee statements in which such increased rates are in effect.

13. These hourly rates set forth above are White & Case's current standard rates and (as noted above) are subject to periodic adjustment in the ordinary course of business. These rates are set at a level designed to fairly compensate White & Case for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses. White & Case also charges its clients in all areas of practice for expenses incurred in connection with each client's case. The expenses charged to clients include, among other things, printing and photocopying, postage and package delivery charges, e-discovery expenses, court fees, transcript costs, travel expenses, expenses for overtime meals, and computer-aided research. White & Case will seek reimbursement, subject to the Court's approval, for all such expenses incurred by White & Case on the Committee's behalf. All requests for reimbursement of expenses will be consistent with any guidelines established by the Bankruptcy Court.

14. White & Case shall apply to this Court for allowance of compensation for professional services rendered and reimbursement of expenses in accordance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local

Rules, any other applicable procedures and orders of the Court, for all professional services performed and expenses incurred in these Chapter 11 Cases.

15. Pursuant to Bankruptcy Rule 2016(b), White & Case has no agreement with any other entity to share any compensation received by White & Case, except as permitted under section 504(b)(1) of the Bankruptcy Code. White & Case has not received any promises as to payment or compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code and as disclosed herein.

16. White & Case did not receive any payments from the Debtors within the ninety (90) day period prior to the Petition Date.

BASIS FOR RELIEF

17. The Committee seeks to retain White & Case as counsel pursuant to sections 1103 and 328(a) of the Bankruptcy Code, the latter of which provides that:

> [the C]ommittee . . . with the court's approval, may employ or authorize the employment of a professional person under section 327 or 1103 of this title, as the case may be, on any reasonable terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis.

18. It is necessary and essential that the Committee, as a fiduciary for all creditors holding unsecured claims, employs counsel to render the aforementioned professional services. The Committee selected White & Case to serve as its counsel because it believes that White & Case is well positioned to provide the legal services that the Committee will require during these Chapter 11 Cases. White & Case is one of the world's leading law firms, with extensive knowledge, experience, and expertise in representing stakeholders in chapter 11 cases, as set forth in the Pesce Declaration. White & Case also has extensive expertise in other fields of law that are implicated by these Chapter 11 Cases including, among others, corporate law, commercial litigation, banking and finance law, capital markets, and tax law.

19. White & Case is expected to render such legal services as the Committee may consider necessary to discharge the Committee's responsibilities and further the interests of its constituents in these Chapter 11 Cases. Based upon the foregoing, the Committee submits that the retention of White & Case is necessary, appropriate, and in the best interests of its constituents.

WHITE & CASE'S DISINTERESTEDNESS

20. Section 1103(b) of the Bankruptcy Code provides that an "attorney . . . employed to represent a committee appointed under section 1102 of this title may not, while employed by such committee, represent any other entity having an adverse interest in connection with the case." As set forth in the Pesce Declaration, White & Case does not hold or represent any interest in these Chapter 11 Cases that is adverse to the Debtors. Moreover, section 328(c) of the Bankruptcy Code may apply by incorporation the "disinterested person" standard to the Committee's advisors. To the best of the Committee's knowledge, (i) White & Case is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code; (ii) neither White & Case nor its professionals have any connection with the Debtors, the creditors, or any other party in interest except at stated in the Pesce Declaration; and (iii) White & Case does not hold or represent any interest adverse to the Committee in the matters for which it is to be retained.

21. Accordingly, the Committee believes that White & Case is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and utilized in section 328(c) of the Bankruptcy Code.[3]

22. Additionally, ordering the Committee's retention of White & Case effective as of September 9, 2025 is appropriate. White & Case has been representing the Committee in

[3] White & Case notes that section 1103 of the Bankruptcy Code does not contain an express requirement that a professional retained by a committee be disinterested.

connection with these Chapter 11 Cases since the date the Committee voted to retain White & Case to act as its counsel. The Debtors believe that no party in interest will be prejudiced by the granting of the employment effective as of September 9, 2025, as provided in this Application, because White & Case has provided and continues to provide valuable services to the Committee and the Debtors' estates. *See also* Local Rule 2014-1(b)(1).

NOTICE

23. Notice of this Application has been provided to: (a) the Debtors; (b) the U.S. Trustee; (c) the holders of the thirty (30) largest unsecured claims against the Debtors (on a consolidated basis); (d) the United States Attorney's Office for the Southern District of Texas; (e) the Internal Revenue Service; (f) the United States Securities and Exchange Commission; (g) the state attorneys general for states in which the Debtors conduct business; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Local Rule 9013-1(d). The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given.

NO PRIOR REQUEST

24. No previous application for the relief sought herein has been made by the Debtors to this Court or any other court.

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CONCLUSION

WHEREFORE, for the reasons set forth herein, the Committee respectfully requests that the Court grant the relief requested in this Application, the Order, and such other and further relief as is just and proper.

Dated: October 8, 2025

Respectfully submitted,

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF MODIVCARE INC. *et. al.*

By: Jupiter Asset Management
Title: Chairperson

/*s/ David Rowe*
Name: David Rowe
Title: Authorized Signatory

EXHIBIT A

Proposed Order

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

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

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

[Relates to Docket No. ___]

Upon the application (the "**Application**")[2] of the Committee for entry of an order (this "**Order**") pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "**Bankruptcy Code**"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and rules 2014-1, 2016 and 9013-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Southern District of Texas (the "**Local Rules**"), authorizing the employment and retention of White & Case LLP ("**White & Case**") effective as of September 9, 2025 as the Committee's counsel; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Application and the relief requested therein

[1] A complete list of each of the Debtors in the 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.

[2] Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Application having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in the Application (the "**Hearing**"); and upon consideration of the Declarations attached to the Application, and the record of the Hearing, if any, and all of the proceedings had before the Court; and the Court having found and determined that White & Case does not represent or hold any interest adverse to the Debtors' estates, and is a "disinterested person" as that term is defined under section 101(14) of the Bankruptcy Code and, as required by section 328 of the Bankruptcy Code, that the relief sought in the Application is necessary and in the best interests of the Committee, the Debtors, their estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. Pursuant to sections 328 and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014, the Committee is authorized to employ and retain White & Case as its counsel in these Chapter 11 Cases in accordance with the terms and conditions set forth in the Application, as modified by this Order, effective as of September 9, 2025.

2. In connection with these Chapter 11 Cases, White & Case shall be compensated and reimbursed for expenses in accordance with, and will file, interim and final fee applications for allowance of its compensation and expenses incurred in connection with these Chapter 11 Cases and shall be subject to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules,

the Local Rules, any applicable orders of the Court, and pursuant to any additional procedures this Court deems appropriate. For billing purposes, White & Case shall keep its time in one tenth (1/10) hour increments.

3. To the extent that White & Case uses contract attorneys who are hired by White & Case to provide services to the Committee, White & Case shall (i) pass-through the cost of such attorneys to the Debtors at the same rate that White & Case pays such attorneys, (ii) seek reimbursement for actual out-of-pocket expenses only, and (iii) ensure that such attorneys are subject to the same conflict checks and disclosures as required of White & Case by Bankruptcy Rule 2014.

4. White & Case shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

5. White & Case will review its files periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

6. The Debtors and the Committee are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. To the extent that the Application and the Declarations attached thereto are inconsistent with this Order, the terms of this Order shall govern.

9. Notice of the Application as provided therein shall be deemed good and sufficient notice of the Application.

10. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025
Houston, Texas

_____
THE HONORABLE ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Pesce Declaration

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

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

DECLARATION OF GREGORY F. PESCE IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

I, Gregory F. Pesce, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the firm of White & Case LLP ("**White & Case**" or the "**Firm**"), an international law firm, which maintains offices for the practice of law at, among other locations, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606-4302, and 609 Main Street, Suite 2900, Houston, TX 77002. Among other admissions, I am a member in good standing of the Bar of the State of Illinois, and I have been admitted to practice *pro hac vice* in these Chapter 11 Cases [Docket No. 158]. There are no disciplinary proceedings pending against me in any jurisdiction.

[1] A complete list of each of the Debtors in the 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.

2. I submit this declaration (the "**Declaration**") pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the "**Bankruptcy Code**"), rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and rules 2014-1, 2016-1 and 9013-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the "**Local Rules**") in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (the "**Application**"), filed contemporaneously herewith by the Committee.[2] To the extent that any information disclosed herein requires amendment or modification upon White & Case's completion of further analysis or as additional information becomes available to it, a supplemental declaration will be submitted to the Court reflecting the same. Except as otherwise noted, I have personal knowledge of the matters set forth herein.[3]

QUALIFICATIONS OF WHITE & CASE

3. On September 9, 2025, the Committee selected White & Case to serve as counsel to the Committee to perform all of the services that are necessary and appropriate to discharge the Committee's responsibilities and further the interests of the Committee's constituents in these Chapter 11 Cases, subject to approval by the Court.

4. Since that time, White & Case has worked closely with the Committee with respect to these Chapter 11 Cases. White & Case understands that the Committee selected White & Case to serve as its counsel based in part upon the Firm's extensive knowledge, experience, and

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

[3] Certain of the disclosures herein relate to matters within the knowledge of attorneys or employees of White & Case and are based on information provided by them.

expertise in representing stakeholders in these Chapter 11 Cases, including in healthcare cases. White & Case also has extensive expertise in other fields of law that are implicated by these Chapter 11 Cases, including, among others, corporate law, commercial litigation, banking and finance law, capital markets, and tax law.

5. White & Case has advised the Committee through a highly qualified team of professionals. The White & Case team has extensive experience in restructuring, corporate law, commercial litigation, banking and finance law, capital markets, tax law, and other areas of expertise that the Committee will require in these Chapter 11 Cases.

6. Given the Firm's experience and knowledge in the fields of debtors', creditors', and equity security holders' rights, and business reorganizations under chapter 11 of the Bankruptcy Code, White & Case is well qualified and uniquely able to act on the Committee's behalf in connection with these Chapter 11 Cases.

SERVICES TO BE PROVIDED

7. The Committee has requested that White & Case render various services, including the following:

(a) advise the Committee regarding its rights, powers, and duties under the Bankruptcy Code and in connection with these Chapter 11 Cases;

(b) assist and advise the Committee in its consultations and negotiations with the Debtors concerning the administration of these Chapter 11 Cases;

(c) assist and advise the Committee in its examination, investigation, and analysis of the acts, conduct, assets, liabilities, and financial condition of the Debtors, including (without limitation) reviewing and investigating prepetition transactions, the operation of the Debtors' business, and the value of such business;

(d) assist the Committee in the review, analysis, and negotiation of any chapter 11 plan(s) that have been or may be filed and assist the Committee in the review, analysis, and negotiation of the disclosure statement accompanying any chapter 11 plan(s);

(e) take all necessary action to protect and preserve the interests of the Committee and creditors holding general unsecured claims against the Debtors' estates, including (i) the investigation and possible prosecution of actions enhancing the Debtors' estates including any potential challenges to the scopes of the prepetition security interests of the Company's first lien lenders, and (ii) review and analysis of claims filed against the Debtors' estates;

(f) review and analyze motions, applications, orders, statements of operations, and schedules filed with the Bankruptcy Court and advise the Committee as to their propriety;

(g) prepare on behalf of the Committee all necessary pleadings, applications, memoranda, orders, reports, and other papers in support of positions taken by the Committee;

(h) represent the Committee at all court hearings, statutory meetings of creditors, and other proceedings before this Court;

(i) assist the Committee in the review, analysis, and negotiation of financing agreements;

(j) assist and advise the Committee as to its communications with its constituents regarding significant matters in these Chapter 11 Cases, including but not limited to, communications required under section 1102(b)(3) of the Bankruptcy Code; and

(k) perform such other legal services as required or otherwise deemed to be in the interests of the Committee in connection with these Chapter 11 Cases.

8. Subject to the Court's approval of the Application, White & Case is willing to serve as the Committee's counsel in these Chapter 11 Cases and to perform the services described above.

COMPLIANCE OF WHITE & CASE WITH
SECTIONS 1103(b) AND 328(c) OF THE BANKRUPTCY CODE

9. I am not, nor is White & Case, an insider of the Debtors. To the best of my knowledge, White & Case (i) does not hold or represent any interest in these Chapter 11 Cases that is adverse to the Committee or the Debtors that would preclude the Firm from acting as counsel to the Committee on the matters for which it is to be engaged as required by section 1103(b) of the

Bankruptcy Code, and (ii) is a "disinterested person," as that term is defined in section 101(14) of the Bankruptcy Code and as may be incorporated by section 328(c) of the Bankruptcy Code.

I. Connections Search and Disclosure Process

10. In accordance with Bankruptcy Rule 2014(a), prior to filing the Application, White & Case conducted a disclosure review with respect to the Firm's connections to the Debtors and the most significant parties in interest in these Chapter 11 Cases based upon a list of interested parties supplied by counsel to the Debtors, a copy of which is annexed hereto as **Schedule 1** (the "**Potential Parties in Interest**").

11. To conduct this review, we caused the names of the Potential Parties in Interest to be run through White & Case's conflicts department to assist in determining whether White & Case has a connection to such parties and, if so, whether such connections relate in any way to the proposed representation of the Committee in these Chapter 11 Cases. Based on reports generated by White & Case's conflicts department, **Schedule 2** annexed hereto identifies those Potential Parties in Interest that White & Case either (i) currently represents, (ii) does not currently represent but has represented within the last two (2) years, or (iii) reasonably anticipates that it will represent in the near future, as a client in matters unrelated to the Debtors, these Chapter 11 Cases, or such entities' claims against and interests in the Debtors, except as may otherwise be disclosed in this Declaration.[4] Of the entities listed on Schedule 2, none represented more than 1% of White &

[4] The term "client" means an entity listed as a client or affiliate of a client in an active or closed matter in White & Case's conflicts search system. To the extent that a Potential Party in Interest falls under more than one category, such Potential Party in Interest may be disclosed below in only one category. Furthermore, the inclusion of a Potential Party in Interest within one or more categories in the Application, this Declaration, or otherwise is for convenience only and is not, and shall not be construed as, an acknowledgement or admission regarding any Potential Party in Interest, including with respect to any claims or relationships that such Potential Party in Interest may have with the Debtors. Finally, White & Case notes that the process has a limited capability to identify affiliates.

Case's revenue for the twelve-month period through August 31, 2025, except for Deutsche Bank AG New York Branch.

12. To the best of my knowledge and information, White & Case does not hold or represent any interest adverse to the Committee, the Debtors, or their estates and, except as disclosed herein or on Schedule 2, does not have any "connections" to the Debtors' creditors, affiliates, other parties in interest and potential parties in interest, the Office of the U.S. Trustee, or the United States Bankruptcy Judge assigned to these Chapter 11 Cases. I do not believe that any of the representations described on Schedule 2 or listed herein are materially adverse to the interests of the Committee, the Debtors, or their estates. In light of the possibility that certain creditors or other parties in interest may not have been identified on Schedule 1, White & Case may have represented, may currently represent, or may in the future represent such entities in matters wholly unrelated to these Chapter 11 Cases. The information listed on the attached schedules may have changed without our knowledge and may change during the pendency of these Chapter 11 Cases. To the extent that White & Case becomes aware of any such changes, White & Case will promptly conduct a disclosure review with respect to such changes and file a supplemental declaration, if necessary.

13. White & Case is a large global law firm. The Firm and its lawyers provide an extremely broad range of services to numerous clients throughout the world. Because of the Firm's extensive worldwide legal practice, including numerous representations and involvements in bankruptcy cases as counsel to debtor and others, White & Case represents or has in the past represented, in matters unrelated to the Debtors or these Chapter 11 Cases, clients that are adverse, or could be considered potentially adverse, to creditors of the Debtors and other parties in interest in these Chapter 11 Cases, in matters unrelated to these Chapter 11 Cases. However, I do not

believe that such representations would preclude the Firm's representation of the Committee on the matters for which it is to be engaged.

II. Disclosures as to Specific Parties in Interest

14. Beginning on August 14, 2025 and through approximately August 21, 2025, White & Case advised Coliseum Capital Management, LLC ("**Coliseum**") in its capacity as a second lien and unsecured noteholder and equityholder in connection with a potential restructuring of ModivCare. On or about August 21, 2025, Coliseum requested that White & Case cease all work on its representation. Prior to White & Case interviewing with the Committee for its role as Committee counsel, White & Case obtained Coliseum's consent to end this representation, and in turn, represent the Committee in connection with all matters in connection with the Debtors and these Chapter 11 Cases. White & Case internally closed the matter with Coliseum, waived all fees and expenses incurred, and did not collect any payment from Coliseum or appear on Coliseum's behalf in these Chapter 11 Cases in connection with this engagement. White & Case will not represent any other party, including Coliseum, in these Chapter 11 Cases. Accordingly, White & Case's prior representation of Coliseum does not preclude White & Case from satisfying the standard for retention of counsel under section 1103(b) of the Bankruptcy Code.

15. Based upon the information available to me, after following the procedures described herein, and as otherwise described on Schedule 2 hereto or herein, we believe White & Case holds no interest adverse to the Debtors with respect to the matters for which it is to be employed.

PROFESSIONAL COMPENSATION

16. White & Case has agreed to serve as counsel to the Committee and receive compensation and reimbursement in accordance with its standard billing practices for services

rendered and expenses incurred on behalf of the Committee, in accordance with sections 328, 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, or as otherwise ordered by the Bankruptcy Court.

17. White & Case will charge its then current standard rate for the professional services that the White & Case has provided to date and will provide in the future. Currently, the hourly rates charged by White & Case in its U.S. offices range from $1,690 to $2,500 for partners, $1,630 for counsel, $870 to $1,580 for associates, and $355 to $700 for paraprofessionals. White & Case has advised the Committee that the hourly rates set forth above are subject to periodic review and adjustment in the normal course of the Firm's business, typically on January 1st of each year, and often due to the increased experience of a particular professional. Such adjustments were last made in January 2025. In the event that its billing rates increase, White & Case will provide notice of any rate increases in the fee statements in which such increased rates are in effect.

18. These hourly rates set forth above are White & Case's current standard rates and (as noted above) are subject to periodic adjustment in the ordinary course of business. These rates are set at a level designed to fairly compensate White & Case for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses.

19. White & Case also charges its clients in all areas of practice for expenses incurred in connection with each client's case. The expenses charged to clients include, among other things, printing and photocopying, postage and package delivery charges, e-discovery expenses, court fees, transcript costs, travel expenses, expenses for overtime meals, and computer-aided research. White & Case will seek reimbursement, subject to the Court's approval, for all such expenses incurred by White & Case on the Committee's behalf. All requests for reimbursement of expenses will be consistent with any guidelines established by the Bankruptcy Court.

20. White & Case shall apply to this Court for allowance of compensation for professional services rendered and reimbursement of expenses in accordance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Rules, any other applicable procedures and orders of the Court, for all professional services performed and expenses incurred in these Chapter 11 Cases.

21. Pursuant to Bankruptcy Rule 2016(b), White & Case has no agreement with any other entity to share any compensation received by White & Case, except as permitted under section 504(b)(1) of the Bankruptcy Code. White & Case has not received any promises as to payment or compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code and as disclosed herein.

22. White & Case did not receive any payments from the Debtors within the ninety (90) day period prior to the Petition Date.

23. Based upon the foregoing, I respectfully submit that the requirements for White & Case's retention as attorneys for the Committee have been met.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 8, 2025
Chicago, Illinois

/s/ Gregory F. Pesce
Gregory F. Pesce
Partner, White & Case LLP

SCHEDULE 1

Potential Parties in Interest List Provided by Debtors[1]

DEBTORS

MODIVCARE INC. (F/K/A THE PROVIDENCE CORPORATION)
A & B HOMECARE SOLUTIONS, L.L.C
A.E. MEDICAL ALERT, INC.
ABC HOMECARE LLC
ALL METRO AIDS, INC.
ALL METRO ASSOCIATE PAYROLL SERVICES CORPORATION
ALL METRO CGA PAYROLL SERVICES CORPORATION
ALL METRO FIELD SERVICE WORKERS PAYROLL SERVICES CORPORATION
ALL METRO HEALTH CARE SERVICES, INC.
ALL METRO HOME CARE SERVICES OF FLORIDA, INC.
ALL METRO HOME CARE SERVICES OF NEW JERSEY, INC.
ALL METRO HOME CARE SERVICES OF NEW YORK, INC.
ALL METRO HOME CARE SERVICES, INC.
ALL METRO MANAGEMENT AND PAYROLL SERVICES CORPORATION
ALL METRO PAYROLL SERVICES CORPORATION
AM HOLDCO, INC.
AM INTERMEDIATE HOLDCO, INC.
ARSENS HOME CARE, INC.
ARU HOSPICE, INC.
ASSOCIATED HOME SERVICES, INC.
AT-HOME QUALITY CARE, LLC (F/K/A AT-HOME QUALITY CARE, INC.)
AUDITORY RESPONSE SYSTEMS, INC.
BARNEY'S MEDICAL ALERT-ERS, INC.
CALIFORNIA MEDTRANS NETWORK IPA LLC
CALIFORNIA MEDTRANS NETWORK MSO LLC
CARE FINDERS TOTAL CARE LLC
CAREGIVERS ALLIANCE, LLC
CAREGIVERS AMERICA HOME HEALTH SERVICES, LLC
CAREGIVERS AMERICA MEDICAL STAFFING, LLC
CAREGIVERS AMERICA MEDICAL SUPPLY, LLC
CAREGIVERS AMERICA REGISTRY, LLC
CAREGIVERS AMERICA, LLC.
CAREGIVERS ON CALL, INC.
CGA HOLDCO, INC.
CGA STAFFING SERVICES, LLC
CIRCULATION, INC.
FLORIDA MEDTRANS NETWORK LLC
FLORIDA MEDTRANS NETWORK MSO LLC
GUARDIAN MEDICAL MONITORING, LLC
HEALTH TRANS, INC.
HEALTHCOM, INC.
HEALTHCOM HOLDINGS LLC
HELPING HAND HOME HEALTH CARE AGENCY INC
HELPING HAND HOSPICE INC.
HIGI CARE HOLDINGS, LLC
HIGI CARE, LLC
HIGI SH HOLDINGS INC.
HIGI SH LLC
INDEPENDENCE HEALTHCARE CORPORATION
METROPOLITAN MEDICAL TRANSPORTATION IPA, LLC
MLA SALES, LLC
MODIVCARE SOLUTIONS, LLC
MULTICULTURAL HOME CARE INC.
NATIONAL MEDTRANS, LLC
NEW ENGLAND EMERGENCY RESPONSE SYSTEMS, INC.
OEP AM, INC.
PANHANDLE SUPPORT SERVICES, INC.
PERSONAL IN-HOME SERVICES, INC.
PHILADELPHIA HOME CARE AGENCY, INC.
PROVADO TECHNOLOGIES, LLC
RED TOP TRANSPORTATION, INC.
RIDE PLUS, LLC
SAFE LIVING TECHNOLOGIES, LLC

[1] This list (and the categories contained herein) are for purposes of a conflicts check only and should not be relied upon by any party as a list of creditors or for any other purpose. Latham has attempted to remove duplicate entries where possible. Accordingly, a party that otherwise would fall under multiple categories is likely to be listed under only one category. Additionally, certain of the Debtors' debt obligations or equity interests may be held by more than one affiliated entity within the same financial institution. Where the affiliation of such entities is obvious based on their names, only one entity is included herein.

SECURA HOME HEALTH HOLDINGS, INC. (F/K/A HEARTS AY HOME HOLDINGS, INC.)
SECURA HOME HEALTH, LLC (F/K/A HEARTS AT HOME, LLC)
SOCRATES HEALTH HOLDINGS, LLC
TRIMED, LLC
UNION HOME CARE LLC
VALUED RELATIONSHIPS, INC.
VICTORY HEALTH HOLDINGS, LLC
VRI INTERMEDIATE HOLDINGS, LLC

NON-DEBTOR AFFILIATES

PROMETHEUS HOLDCO, LLC
ARUBU, INC.
HIGI SH CANADA ULC
INGEUS INVESTMENTS LIMITED
INGEUS, LLC
MERCURY PARENT, LLC
MODIVCARE LABS PRIVATE LIMITED
NEMT INSURANCE DE LLC, SERIES 1
MEDTRANS NETWORK IPA, LLC

DEBTORS' PREVIOUS NAMES, PREDECESSORS, AND RELATED ENTITIES

MODIVCARE INC. (F/K/A THE PROVIDENCE CORPORATION)
AT-HOME QUALITY CARE, LLC (F/K/A AT-HOME QUALITY CARE, INC.)
SECURA HOME HEALTH HOLDINGS, INC. (F/K/A HEARTS AY HOME HOLDINGS, INC.)
SECURA HOME HEALTH, LLC (F/K/A HEARTS AT HOME, LLC)

DEBTORS' RESTRUCTURING AND OTHER SIGNIFICANT PROFESSIONALS

FTI CONSULTING, INC.
HUNTON ANDREWS KURTH LLP
LATHAM & WATKINS LLP
MOELIS & COMPANY
KURTZMAN CARSON CONSULTANTS, LLC (D/B/A VERITA GLOBAL)
QUINN EMMANUEL URQUHART & SULLIVAN LLP

DEBTORS' ORDINARY COURSE PROFESSIONALS

ANYBILL
BRADLEY ARANT BOULT CUMMINGS LLP
CAPITAL IMPACT GROUP LLC
ERNST & YOUNG US LLP
GIBSON, DUNN & CRUTCHER LLP
KELLEY CONSULTING
KPMG LLP
LITTLER MENDELSON PC
M J SIMON & COMPANY LLC
NIXON PEABODY LLP
POLSINELLI PC
PRICEWATERHOUSE COOPERS LLP
RODEFER MOSS & CO PLLC
STATE EMPLOYEES' CREDIT UNION
STEVENS & LEE P.C.
WILLCOX SAVAGE CONSULTING LLC
WILLOUGHBY HUMPHREY & D'ANTONI PA

PROFESSIONALS FOR OTHER MAJOR STAKEHOLDERS

PAUL HASTINGS LLP
CHILMARK PARTNERS, LLC
LAZARD FRERES & CO. LLC

MAJOR EQUITY HOLDERS[11]

AI CATALYST FUND, LP
ARISTOTLE CAPITAL BOSTON, LLC
COLISEUM CAPITAL MANAGEMENT, LLC
D.E. SHAW & CO
SCEPTER HOLDINGS, INC.
SSGA ACTIVE TRUST
THE VANGUARD GROUP, INC.
BARROW, HANLEY, MEWHINNEY & STRAUSS LLC

CURRENT AND FORMER OFFICERS AND DIRECTORS (UP TO 3 YEARS)

ANNE BAILEY
BARBARA GUTIERREZ
CAROLYN MCCARTHY
CHELSEY BERSTLER
CHRIS ECHOLS
CHRIS HEINE
CHRIS SHACKELTON
CRAIG BARBAROSH
DAMON GREEN
DAVID COULTER
FAISAL KHAN
FRANCIS JACKSON WRIGHT
GARTH GRAHAM
ILIAS SIMPSON
JAMES WATSON
JARON ROSS
JEFF BENNETT
JENNIFER JASKOLKA
JODY KEPLER
JONATHAN BUSH
L. HEATH SAMPSON
LESLIE V. NORWALK
MIA HANEY
NEAL GOLDMAN
RAHUL DIGAMBER SAMANT
RICHARD A. KERLEY
SHANE RAGLAND
TODD CARTER
ALEC CUNNINGHAM
DAVID MOUNTS GONZALES
ERIN RUSSELL
DANIEL. B SILVERS

TRUSTEES, AGENTS, SECURED LENDERS (INCLUDING CERTAIN BOND HOLDERS), AND OTHER POTENTIAL LIENHOLDERS

ALLIANCEBERNSTEIN HOLDING LP
ALLSPRINGS GLOBAL INVESTMENTS
ANKURA TRUST COMPANY, LLC
BANK OF AMERICA, N.A.
BARCLAYS BANK PLC
BEACH POINT CAPITAL MANAGEMENT
BIRCH GROVE CAPITAL
BNP PARIBAS S.A.
BRIGADE CAPITAL MANAGEENT
CHILMARK PARTNERS, LLC
CIBC BANK USA
COMERICA BANK
D.E. SHAW & CO
DEUTSCHE BANK AG NEW YORK BRANCH
ENSIGN PEAK ADVISORS
FIAM LLC AN AFFILIATE OF FIDELITY INVESTMENTS
HALSEYPOINT ASSET MANAGEMENT, LLC
HEWLETT-PACKARD FINANCIAL SERVICES COMPANY
HG VORA CAPITAL MANAGEMENT
HSBC BANK PLC
JEFFERIES FINANCE LLC
JP MORGAN CHASE BANK, N.A.
JUPITER ASSET MANAGEMENT
KEYBANK, NATIONAL ASSOCIATION
MADISON AVENUE INTERNATIONAL LP
METROPOLITAN WEST ASSET MANAGEMENT
NEUBERGER BERMAN GROUP
POLAR ASSET MANAGEMENT PARTNERS INC.
PRIVATEBANK AND TRUST COMPANY
Q5-R5 TRADING, LTD.
REDWOOD CAPITAL MANAGEMENT
REGIONS BANK
ROARING FORK TRADING
SILVER ROCK FINANCIAL LP

[11] For purposes of this list, major equity holders are considered to be persons or entities who held in excess of 1% of the Debtors' equity securities as of the Petition Date.

SILVER ROCK MANAGEMENT LLC
SUMMIT HOUSE CAPITAL MANAGEMENT, LLC
SUMITOMO MITSUI BANKING CORPORATION
TCW ASSET MANAGEMENT COMPANY
TCW GROUP
TEXAS EXCHANGE BANK
TRUIST BANK
U.S. BANK EQUIPMENT FIANANCE
WELLS FARGO BANK, N.A.
WILMINGTON TRUST
WSFE BANK

OTHER NOTEHOLDERS

JUPITER FUND MANAGEMENT
BLACKROCK
STATE STREET
OLIVE STREET INVESTMENT ADVISERS
GRACE PARTNERS OF DUPAGE
CANADIAN IMPERIAL BANK
AMERIPRISE FINANCIAL
POLEN CAPITAL MANAGEMENT

TOP 30 UNSECURED CREDITORS

1800MEDIVAN INC
ACTIVE SC ONE INC
AM PM MEDICAL TRANSPORTATION COMPANY INC
AMAZON WEB SERVICES, INC.
BASIN INNOVATION GROUP LLC
BERHANU ALAZE
BEST NEIGHBOR TRANSPORTATION LLC
BROADRIDGE ICS
CDW DIRECT
CHEIIS TRANSPORT LLC
ELITE HOME CARE LLC
EMPLOYEES PROVIDENT FUND ORGANISATION
GALAXY AMBULANCE LLC
HOMECARE SOFTWARE SOLUTIONS LLC
HOSPITAL TO HOME LLC
HUMANA, INC.
IBEX GLOBAL FZ-LLC
KDK TRANSPORT COMPANY
LIFE TECH INC
LYFT HEALTHCARE INC
METRO ONE AMBULANCE INC.
MORRIS AND COMPANY
ORION CONSULTING
PNP GROUP LLC
RANDSTAD NORTH AMERICA LP
REYNO CAR SERVICE INC
RIDE SOURCE INC
SHELTERPOINT LIFE INSURANCE CO
SKORI INC
SOFTSERVE INC.
SUNSHINE STATE HEALTH PLAN INC.
TRICARE AT INSPIRA LLC
UBER HEALTH LLC
UNITED HEALTHCARE SERVICES INC
WILMINGTON SAVINGS FUND SOCIETY, FSB
WSFS BANK

MAJOR SUPPLIERS AND VENDORS

3 OMR LLC
AB EXPRESS TRANSPORT LLC
ACADIAN AMBULANCE SERVICE OF NEW ORLEANS
ADVANCED MEDICAL TRANSPORT CORP
AIRPORT EXPRESS INC
AIRPORT TAXI INC
ACE USA
ALCHEMY TECHNOLOGY GROUP LLC
ALL AIRPORT TAXI INC
ALLMED TRANSPORTATION INC
ALPHA MEDICAL TRANSPORTATION INC
AMERICAN EXPRESS
AMERICAN GROUND TRANSPORTATION
AMERICAN MEDICAL RESPONSE WEST
ARISE VIRTUAL SOLUTIONS INC
ASSIST MEDICAL SERVICE INC
ASTRA CARE LLC
BIG DOG CITY CORPORATION
BIG ISLAND LIMOUSINE INC
C & H COMPANY
CALIFORNIA ACCESS INC
CITY OF SACRAMENTO FIRE DEPARTMENT
CLX MEDICAL TRANSPORT INC
COMPASSION CARE SENIOR SERVICES
COMPLETE MEDICAL TRANSPORT CORP
DEPENDACARE TRANSPORTATION LLC
DURICARE INC
EASTWESTPROTO INC
ELITE CARE AMBULANCE INC
ETA TRANS INC
EXPRESS TRANSPORTATION AGENCY
FASTCARE MEDICAL TRANSPORTATION LLC
FREEUS, LLC
GALAXY AMBULANCE LLC
GOLD STAR EMS LLC

GOLDEN STATE MANAGEMENT GROUP INC
GOOD VIBES MEDICAL TRANSPORTATION LLC
GOODWILL TRANSPORTATION SERVICES LLC
HULIN TRANSPORTATION, INC
IBEX GLOBAL SOLUTIONS
INDEPENDENT CAB
INTEGRITY MEDICAL TRANSPORTATION CORP
INTEGRITY MEDICAL TRANSPORTATION CORP
JOHNSON MEDICAL TRANSPORT LLC
JUDI'S CARRIER SERVICE INC
KIBOIS COMMUNITY ACTION FOUNDATION, INC
KWPH ENTERPRISES
L& L TRANSPORTATION LLC
LALIBELA TRANSPORTATION LLC
LUCY TRANSPORTATION INC
LYFT INC.
M & M GROUP INC
MARE TRANSPORTATION INC
MARVEL MEDICAL TRANSPORT LLC
MEDEX TRANSPORTATION INC
MEDICAL TRANSPORT SOLUTIONS INC
MEDICAL XPRESS NON EMERGENCY TRANSPORT
MEDLINK MEDICAL TRANSPORT INC
METRO ONE AMBULANCE INC
MONTES DE OCA CORP DBA MK UNLIMITED
NEW JERSEY TRANSIT CORP
ON TIME AMBULANCE INC
P & I TRANSPORTATION INC
PATTERSON TRANSPORTATION SERVICE LLC
PAUL D RONALD
PONY CARE TRANSPORTATION INC.
PRO TRANSPORT-1, LLC
PROCARE MEDICAL TRANSPORTATION CORP
PULSE MEDICAL TRANSPORTATION
QUICK PICK TRANSPORTATION INC.
RECVUE INC
RESOURCE MANAGEMENT SYSTEMS INC
RICHMOND CITY TAXI CAB INC
RIDE PLUS LLC
ROMED INC
ROYAL CAB INC
ROYAL MEDICAL TRANSPORTATION LLC
ROYAL TRANSPORTATION LLC
SACRAMENTO METROPOLITAN FIRE DISTRICT
SAFETY 1ST PARATRANSIT INC
SAHRAWI INC
SALESFORCE.COM INC
SHIRETOWN SOLUTIONS LLC
SHUTTLE RUIDOSO LLC
SKORI INC
SKY TRANSPORTATION LLC
SOUTHEAST TRANSPORTATION SERVICES LLC
SUNSHINE MEDICAL TRANSPORT LLC
TEDLA TRANSPORTATION
TEPLIS TRAVEL SERVICE
TEXAS MEDICAL TRANSPORTATION
TOP GUN TRANSIT LLC
TRANSPORT SOLUTIONS
TRANSPORT4ELDERS LLC
TRICARE MEDICAL TRANSPORTATION
VA TRANSPORT LLC
VALLEY MEDICAL TRANSPORT LLC
VXI GLOBAL SOLUTIONS LLC
WORKBOARD INC
WORKDAY INC
YELLOW CAB MEDICAL TRANSPORT LLC

MAJOR CUSTOMERS

ALAMEDA ALLIANCE FOR HEALTH
ARKANSAS DEPARTMENT OF HUMAN SERVICES OFFICE OF PROCUREMENT
BLUE CROSS OF CALIFORNIA
BROADRIDGE ICS
COMMONWEALTH OF VIRGINA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES
COMMONWELTH OF PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES
COMMONWELTH OF VIRGINA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES
COVENTRY HEALTH CARE OF VIRGINIA
HEALTH CARE SERVICE CORPORATION
HEALTH NET OF CALIFORNIA, INC.
HEALTHFIRST HEALTH PLAN, INC.
HUMANA MEDICAL PLAN
OKLAHOMA HEALTH CARE AUTHORITY
ORANGE COUNTY HEALTH AUTHORITY
SENTARA HEALTH ADMINISTRATION
SOUTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES
STATE OF DELAWARE, DEPARTMENT OF HEALTH AND SOCIAL SERVICES
THE GEORGIA DEPARTMENT OF COMMUNITY HEALTH
THE STATE OF MAINE, DEPARTMENT OF HEALTH AND HUMAN SERVICES
THE STATE OF NEW JERSEY, DIVISON OF MEDICAL ASSISTANCE AND HEALTH SERVICES
THE WEST VIRGINIA BUREAU FOR MEDICAL SERVICES
UNITED HEALTH CARE INSURANCE COMPANY

DEBTORS' BANKS

WELLS FARGO BANK, N.A.
WEBSTER BANK, N.A.
PNC BANK, N.A.
IMPERIAL BANK OF CANADA
CITIZENS BANK, N.A.
BANC OF CALIFORNIA, INC.
HSBC HOLDINGS PLC.
VANTAGE BANK TEXAS
TRUIST FINANCIAL CORPORATION
MORGAN STANLEY
U.S. BANCORP

INSURANCE PARTIES

ACE AMERICAN INSURANCE COMPANY (CHUBB)
ACE FIRE UNDERWRITERS INSURANCE COMPANY (CHUBB)
ALLIANZ GLOBAL RISKS US INSURANCE COMPANY
ALLIANT INSURANCE SERVICES, INC.
ARCH INSURANCE COMPANY
ARCH SPECIALTY INSURANCE COMPANY
BERKELEY SPECIALTY INSURANCE
BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY
BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY
COBBS ALLEN CAPITAL HOLDINGS, LLC
CONTINENTAL CASUALTY COMPANY (CNA)
ENDURANCE AMERICAN INSURANCE COMPANY
ENDURANCE AMERICAN INSURANCE COMPANY (SOMPO)
ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY
ESIS, INC.
FAIR AMERICAN INSURANCE AND REINSURANCE COMPANY (ATRI)
FAIRMATIC (SIRIUSPOINT SPECIALTY INSURANCE COMPANY)
FEDERAL INSURANCE COMPANY (CHUBB)
FIREMAN'S FUND INSURANCE COMPANY (ALLIANZ)
FIREMAN'S FUND INSURANCE COMPANY
GREAT AMERICAN INSURANCE COMPANY
ILLINOIS UNION INSURANCE COMPANY (CHUBB)
INDEMNITY INSURANCE COMPANY OF NORTH AMERICA (CHUBB)
LANDMARK AMERICAN INSURANCE COMPANY
LANDMARK AMERICAN INSURANCE COMPANY (R-T SPECIALTY)
LIBERTY SURPLUS INSURANCE CORPORATION
MERCER INSURANCE COMPANY (R-T SPECIALTY)
MSIG SPECIALTY INSURANCE USA (PROPRAXIS)
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA. (AIG)
RSUI INDEMNITY COMPANY (R-T SPECIALTY)
SCOTTSDALE INSURANCE COMPANY (PROPRAXIS)
SIRIUSPOINT LTD.
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA
WESTFIELD SELECT INSURANCE COMPANY
W. R. BERKLEY CORPORATION
XL SPECIALTY INSURANCE COMPANY
XL SPECIALTY INSURANCE COMPANY

SURETY BOND ISSUERS & BENEFICIARIES

AMERIGROUP PARTNERSHIP PLAN, LLC
ATLANTIC SPECIALTY INSURANCE COMPANY
BLUE CROSS OF CALIFORNIA DBA ANTHEM BLUE CROSS
COMMONWEALTH OF VIRGINIA
DELAWARE FIRST HEALTH, INC
ELEVANCE HEALTH, INC.
FEDERAL INSURANCE COMPANY
MAGNOLIA HEALTH PLAN, INC.
OKLAHOMA COMPLETE HEALTH, INC. C/O CENTENE CORPORATION
PENNSYLVANIA PUBLIC UTILITY COMMISSION
SIRIUSPOINT AMERICA INSURANCE COMPANY
STATE OF ALABAMA

STATE OF CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION
STATE OF FLORIDA, AGENCY FOR HEALTH CARE ADMINISTRATION
STATE OF INDIANA, FAMILY AND SOCIAL SERVICES ADMINISTRATION, OFFICE OF MEDICAID POLICY AND PLANNING
STATE OF MAINE DEPARTMENT OF TRANSPORTATION
STATE OF NEW JERSEY
STATE OF SOUTH CAROLINA, DEPT. OF HEALTH AND HUMAN SERVICES
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA
VIRGINIA DEPARTMENT OF MOTOR VEHICLES
WELLCARE AFFILIATES
WESTCHESTER FIRE INSURANCE COMPANY

LANDLORDS

1 AVENUE C BUILDING MADISON
111 WASHINGTON STREET REALTY LLC
1590 ADAMSON LLC
174 JEFFERSON, LLC
18 SHEPARD STREET LLC
1978 THIRD AVENUE LLC
22 WEST MAIN LLC
26 JOURNAL SQUARE OWNER LLC
30 PECK ROAD LLC
307-319 W LANDIS LLC
330 SCANGAS NOMINEE TRUST
39 CROSS 79 PROSPECT REALTY TRUST
400 SOUTHBOROUGH LLC
446A BLAKE LLC C/O TOM GELMAN
6900 LAYTON SUBSIDIARY, LLC
70 EAST SUNRISE HWY LLC
7055 BRANDY HILL PLAZA ASSOCIATES LLC
75 BROAD LLC
8 PENN CENTER OWNER LP
800 BRIDGECAM LLC
8818 EXPEDITION LLC
ALBANY TOWERS LLC
AVANTI HOLDINGS LLC
BALANCE HOLDINGS, LLC
BANTA MANAGEMENT LLC
BLOOMFIELD BK, LLC
BLS ASSET MANAGEMENT CORP
BOIC PROPERTIES LLC
BRIDGE33 REAL ESTATE PARTNERS LP
BUFFINGTON PROPERTY MANAGEMENT LLC
BYRON KOTZAS & OLGA DOMOTOR ETAL PT
CGP DEVELOPMENT CO INC
CIPHER REALTY
CITATION INVESTMENTS INC
CITY OF NORTON
COLIN DUNCAN
COLONIAL CENTRE SQUARE LLC
DAVIS PROFESSIONAL PARK LLC
DEBRA SAYLES
DF ACQUISITIONS LLC
DIAMOND PROPERTY MANAGEMENT, LLC
EDGEWATER CORPORATE PARK LLC
ELM GROVE REALTY, LLC
ENGHOUSE INTERACTIVE INC
EWING EQUITIES, LLC
FORTUNATO REALTY INC
GARVEY PROPERTIES
GPI-CAL REALTY I LP
HANOVER PLAZA ASSOCIATES
HM SKY HARBOR, LLC
HURON GROUP INC
JMDJMS LIMITED LIABILITY COMPANY
KAGR2 BINGHAMTON LLC
KOAM INVESTORS GROUP, LLC
KELLAR INDUSTRIES, LLC
LAPP LIMITED PARTNERSHIP
LEE, WEST & WALSH, LP
LEGERE PROPERTIES LLC
MARK J. OTERI
MARQUEZ-ENT, LLC
MAYNARD ROAD CORP
MCCORMACK FAMILY LIMITED PARTNERSHIP
MELLIN LIMITED PARTNERSHIP
METROPLEX ASSOCIATES 1
METROPLEX ASSOCIATES 2
MIAMI LAKES CENTER LLC
MJH WACKER LLC
NICOLAS HERRERA
NORTHPARK OFFICE LLC
PALISADE PLAZA WEST LLC
PALM BEACH BUSINESS CENTER PARTNERSHIP
PAVILION UNIT ACQUISITION LP
PEAK REALTY ENTERPRISES LLC
PREMIUM ASSET MANAGEMENT, INC.
PRIMECO TOWERS INDIA
Q2U2 LLC
REGUS
RNSI CITY PLACE JV LLC
ROBERT & PATRICIA AIKEN
ROBERT L ECKLIN
ROBERT L. ALBERTSON, JR.
ROC II FAIRLEAD GRAN PARK AVENUES LLC
S&N LAWRENCE REALTY LLC
S&R LLC
SEAMLESS CENTENNIAL LTD
SEMYA I LLC

SHELBOURNE LAFAYETTE LLC
SHRESTHA P MANAGEMENT LLC
SIKYU ENTERPRISES LLC
SL TOWN CENTER REALTY, LLC
SPIEGEL & SPIEGEL PA MONEY PURCHASES PENSION PLAN AND 401 K PROFIT SHARING PLAN
SUMMIT INVESTMENTS PROPERTIES LLC
TANIOS REALTY LLC
THE WE COMPANY MANAGEMENT HOLDINGS L.P.
THOMAS A BECKER
THORNE PROPERTIES
TN BROTHER LLC
TSK MORRIS LLC
TSO ICP LP
UNIVERSITY AVENUE LLC
USA EQUITY TRUST LLC
WATER STREET REALTY TRUST
WEWORK
WEBBS PROPERTY LLC
WICK SHOPPING PLAZA ASSOCIATES LLC
WILLOWOOD PARK LLC
WOODSIDE SPECIAL OPPORTUNITY PE FUND LP

UTILITIES

11:11 SYSTEMS, INC.
3N DOCUMENT DESTRUCTION INC
4 ELOHIM CLEANING INC.
A&E LOW VOLTAGE SOLUTIONS LLC
8X8 INC
A1 DATASHRED
A&E LOW VOLTAGE SOLUTIONS LLC
ABINGTON TOWNSHIP POLICE DEPARTMENT
ACCURATE FIRE EQUIPMENT CORP
ADT US HOLDINGS INC
AFFORDABLE PEST CONTROL, INC.
AFFORDABLE SHRED AND STORAGE
ALLIED FIRE & SAFETY EQUIPMENT CO, INC.
AMERICAN ELECTRIC POWER
AT&T
AT&T MOBILITY
ATMOS ENERGY CORPORATION
BANDWIDTH INC.
BLOOM SERVICES LLC
BOARDMAN FIRE EXTINGUISHER CO INC
BOROUGH OF CLARKS SUMMIT
BOSTON FIRE EXTINGUISHER CO INC
BRISCOE PROTECTIVE LLC
BUEHLER MOVING AND STORAGE CO
CHARTER COMMUNICATIONS
CINTAS CORPORATION NO. 2
CITY OF PERTH AMBOY
CITY OF SULLIVAN (CIVIC CENTER)
CITY OF TEMPE POLICE DEPARTMENT
CITY OF VINELAND - FIRE
CLEARFIELD MUNICIPAL AUTHORITY
COGENT COMMUNICATIONS, LLC
COLOGIX
COLONIAL RECORD STORAGE
COMCAST
COMMONWEALTH EDISON COMPANY
CON EDISON CO OF NEW YORK
CORNING NATURAL GAS CORP
COX COMMUNICATIONS ARIZONA, LLC
DATA STRUCTION
DIALPAD INC.
EARTHWORKS LANDSCAPE & DESIGN INC
ELIZABETHTOWN GAS COMPANY
EMERGENT POWER SOLUTIONS LLC
ENTERGY UTILITY HOLDING COMPANY, LLC
FIRE PROTECTION PRODUCTS
FIRE PROTECTION SERVICE CORPORATION
FIRSTENERGY CORP
FLORIDA POWER AND LIGHT
FRANKLIN TOWNSHIP SUPERVISORS
FRONTIER COMMUNICATIONS
G&G PROPERTY MAINTENANCE
GROUNDSYSTEMS, INC
IMWOTH LLC
INFOSHRED LLC
INTERNATIONAL TELCOM, LLC
IRIS GROUP HOLDINGS LLC
IRON MOUNTAIN
IRON MOUNTAIN INCORPORATED
JEMPS MANAGEMENT
JOHN'S REFUSE & RECYCLING, LLC
LEVEL 3 COMMUNICATIONS LLC
LONG ISLAND LIGHTING CO
LOWITT ALARMS SECURITY SYSTEM
LS REMOLENG LLC
MARMIC FIRE AND SAFTEY CO INC
MASERGY COMMUNICATIONS, INC.
MONONGAHELA POWER CO
MOUNTAINEER GAS COMPANY
NATIONAL GRID
NEPTUNE FIRE DISTRICT #1
NEW JERSEY-AMERICAN WATER COMPANY
NIAGARA MOHAWK POWER CORPORATION
NJR HOME SERVICES COMPANY
NORTH CENTRAL SIGHT SERVICES INC
NYSEG
ON SITE CONFIDENTIAL SHREDDING JJMR LLC
PACKETFABRIC INC
PALISADE PLAZA WEST LLC

PECO ENERGY COMPANY
PENNSYLVANIA AMERICAN WATER COMPANY
PENNSYLVANIA ELECTRIC COMPANY
PJSJ ENTERPRISES INC
PPL ELECTRIC UTILITIES CORPORATION
PSE&G CO
REPUBLIC SERVICES, INC.
ROCHESTER GAS AND ELECTRIC CORP
ROMAN SENTRY SECURITY SYSTEMS, INC.
RUMPKE OF OHIO, INC.
SAFT LTD
SANGOMA US INC.
SECURITAS TECHNOLOGY CORPORATION
SECURITY RESOURCES INC
SERVICE LOGIC STRATEGIC SERVICES, LLC
SOME LIKE IT GREEN LLC
SOUTH JERSEY GAS
STERICYCLE INC
SUMMIT FIRE & SECURITY LLC
TEXAS GAS SERVICE
THE ADT SECURITY CORPORATION (INACTIVE)
THE CONNECTICUT LIGHT AND POWER CO
THE SHREDDING SOURCE
THE SOUTHERN CONNECTICUT GAS COMPANY
THE UNITED ILLUMINATING COMPANY
T-MOBILE USA INC
TITANIUM SECURITY & SURVEILLANCE LLC
TOWN OF NORTH ATTLEBOROUGH
TOWNSHIP OF PARSIPPANY
UGI UTILITIES INC
VEOLIA WATER NEW JERSEY INC
VERIZON COMMUNICATIONS INC.
VINELAND MUNICIPAL UTILITES
VITAL RECORDS HOLDINGS LLC
WHITE PALMS FIRE REQUIPMENT INC
WIGGINS SHREDDING, INC
WINDSTREAM
WM CORPORATE SERVICES, INC.
YALL RITE LLC DBA GREENLEAF RECYCLING

UNITED STATES BANKRUPTCY JUDGES FOR THE SOUTHERN DISTRICT OF TEXAS (AND KEY STAFF MEMBERS)

AARON JACKSON
AKEITA HOUSE
ANA CASTRO
JEANNIE CHAVEZ
JUDGE ALFREDO R. PEREZ
JUDGE CHRISTOPHER M. LOPEZ
JUDGE EDUARDO V. RODRIGUEZ
JUDGE JEFFREY P. NORMAN
JUDGE MARVIN ISGUR
ROSARIO SALDANA
SHANNON HOLDEN
SIERRA THOMAS-ANDERSON
TRACY CONRAD
TYLER LAWS
YESENIA LILA
NATHAN OCHSNER

UNITED STATES TRUSTEE FOR THE SOUTHERN DISTRICT OF TEXAS (AND KEY STAFF MEMBERS)

ALETHEA CALUZA
ALICIA BARCOMB
ALINA SAMKO-YU
ANDREW JIMENEZ
CHRISTOPHER R. TRAVIS
CHRISTY SIMMONS
GLENN OTTO
GWEN SMITH
HA NGUYEN
HECTOR DURAN
IVETTE GERHARD
JANA WHITWORTH
JAYSON B. RUFF
KEVIN M. EPSTEIN
LINDA MOTTON
MILLIE APONTE SALL
RAJALAKSHMI KRISHNAN
SAMANTHA CHILTON
SUSAN B. HERSH
VIANEY GARZA
YASMINE RIVERA

EMPLOYEE INSURANCE PROGRAM ADMINISTRATORS

AMERICAN SPECIALTY HEALTH INCORPORATED
AUTOMATIC DATA PROCESSING, INC.
BIND BENEFITS, INC. D/B/A SUREST
CBIZ, INC.
COMPSYCH EMPLOYEE ASSISTANCE PROGRAMS, INC.
ESIS, INC.

HEALTHSMART HOLDINGS INC.
IMAGINE HEALTH, INC.
METLIFE, INC.
OPTUM BANK, INC.
OPTUMRX, INC.
PARTNERS DIRECT HEALTH LLC
THE CIGNA GROUP
TRUDATARX, INC.
UNITEDHEALTH GROUP
VERACITY BENEFITS, LLC
VOYA FINANCIAL, INC.
WELLFLEET INSURANCE COMPANY
WEX INC.

COMPETITORS

ACCESSCARE
ALIVI HEALTH
CALL THE CALL
MEDIDRIVE
MTM, INC.
RIDE2MD

ADVERSE PARTIES IN LITIGATION, ADMINISTRATIVE PROCEEDINGS, AND OTHER LEGAL OR REGULATORY MATTERS

LAW OFFICES OF DAVID M. GASPARI, P.A.[12]
PENNSYLVANIA HUMAN RELATIONS COMMISSION
ADRIENNE REED
ALEXA MORALES
ALEXIS JONES
AMERICAN GROUND TRANSPORTATION
ANDREA HINSON DEANGELO DAVIS
ANGEL PEREZ
ARTHUR OWENS
ASANTA S. BUXTON
BRANDY CURTIS
BRENT JOHNSON
BRITTNEE HARRIS
CAMECISE METELLUS
CARLA WILLIAMS
CHEREDA IVORY
CHRISTOPHER SMITH
CLEMMIE WILLIAMS
COOLYN TURNER
CYNTHIA BREECE
DALE FITZ
DANNY EVANS
DARYL STOKES
DAVID PULSIFER
DAVID T. PATTERSON
DEBBIE MARIE HOWARD
DEBRA BURDEN
DEBRA CHABERT
DEBRA JONES
DENISE AVALOS
DENZELL CARSWELL
DEXTER SIAS
DIANA CLAUDIO
DIANNA GUINYARD
DINESH KALERA
DOMINICK VITI
DONNA MAE TOTTY
DOUGLAS SELBY
EASTER LYONS
EDWIN BARROSO-PEREZ
ELAINE BOWDOIN
ELIZABETH HERNANDEZ HERRERA
ELLEN PILLEY
ELLEN REYES
FATIMA ZHINDON
FRANCES DOUGLAS
GABRIELLA ARCENA DE LOS SANTOS
GERALDINE NIXON FORD
GERALDINE ORR
GWENDOLYN MOBLEY
HEATHER SWICK
HELEN D. WALKER
HOPE SADLER
IDA WILLIAMS
INSTANT TRANSPORTATION LLC
JACQUELINE SISTRUNK
JAMES A. BATES
JAMES OLIVER STEPHENS
JAMES PEREZ
JAYESON HENRY
JEFFREY HARRIS
JESSIE LOVE
JHOVANNA PARKER
JIMMY SMITH
JORGE FURCOY
KAREN WALTERS
KENYATTA GODWIN
LEA'CIMMONE BRIGGS
LEWIS HAGAR
LEWIS S. GLASS
LINDA GANT

[12] Law firm names appear where an adverse plaintiff's name has been anonymized in court filings.

MAE ROBERTSON
MARIA J. CAMACHO PINEDA
MARIANN SCHROEDER
MARQUIS HINES
MARTHE PAUL
MARTIN LUQUE
MARYANN ORTEGA
MICHAEL MAVROVITIS
MODEST KELTRICK
MOIRA SANDROCK
NHI NGU
NICHOLAS GARZA
NILSA TORRES
NORMAN FISHBEIN
ORLANDO CLARK
QADRIYYAH HILL
RACHEL CORBETT
RAPHAEL CRAWFORD
READING METRO, LLC
ROBERT KLEBETZ
ROBERT L. FREIDMAN
ROBERT SMITH
ROBERTA GWIN
RODRICK HACKWORTH
RONALD HINES
RONNIE HUNT
RUTH OLIVER
RYAN MARTIN
SADIE DONNELL
SADIE DONNELL CHRISTOPHER SMITH
SALLY TRIANO
SANDRA PADILLA HERNANDEZ
SANTA GUERRERO
SEINI IKA
SENIORCARE EMERGENCY MEDICAL SERVICES, INC.
SHABANA HAFIZ
SHAUNTALAY MCCLENDON
SHAWN MEADOWS
SHOOSHANIK CHARKHCHIAN
SONYA ROSS
STACIE ROGERS
SUFUNDA SAMUEL
SUZANNE BETTS
SUZIE PLUMAJ
TERENCE WHITE
TERRENCE CORA
THERESA HENRY
THERESA LYONS
TINA HAGER
TRINIDAD DE LA CRUZ
VEDA ROBERSON
VINCENT STALEY
WILLARD MCCLAM
WILLIE CROMARTIE
ZANE WHITFIELD

GOVERNMENT AUTHORITIES AND TAX COLLECTORS

ABINGTON MUNICIPAL TAX COLLECTOR
ABINGTON TOWNSHIP TAX OFFICE
ALABAMA DEPARTMENT OF REVENUE
ALBEMARLE COUNTY TAX COLLECTOR
ALEXANDRIA FINANCE DEPARTMENT
ALIEF ISD TAX OFFICE
AMERICAN FINANCIAL CREDIT SERVICES, INC.
AMESBURY MUNICIPAL TAX COLLECTOR
ANSONIA CITY TAX COLLECTOR
ARIZONA DEPARTMENT OF REVENUE
ARKANSAS DEPARTMENT OF FINANCE AND ADMINISTRATION
ARKANSAS DEPT. OF FINANCE AND ADMINISTRATION
ASOTIN COUNTY TAX COLLECTOR
ATTLEBORO MUNICIPAL TAX COLLECTOR
BEAUFORT COUNTY TREASURER
BELL COUNTY
BENTON COUNTY TAX COLLECTOR
BERKHEIMER TAX ADMINISTRATOR
BERKS COUNTY TAX COLLECTION COMMITTEE
BERLIN MUNICIPAL TAX COLLECTOR
BERNALILLO COUNTY TAX COLLECTOR
BEXAR COUNTY TAX ASSESSOR-COLLECTOR
BOSSIER PARISH SHERIFF
BOSTON ASSESSING DEPARTMENT
BOURNE MUNICIPAL TAX COLLECTOR
BRAINTREE MUNICIPAL TAX COLLECTOR
BRANFORD TOWN TAX COLLECTOR
BRAZORIA COUNTY TAX OFFICE
BRAZOS COUNTY TAX OFFICE
BRIDGEPORT CITY TAX COLLECTOR
BRISTOL CITY TAX COLLECTOR
BROCKTON MUNICIPAL TAX COLLECTOR
BROOKFIELD TOWN TAX COLLECTOR
BRUNSWICK COUNTY TAX COLLECTOR
BURLINGTON MUNICIPAL TAX COLLECTOR
BURNET COUNTY TAX ASSESSOR-COLLECTOR
CALIFORNIA DEPARTMENT OF TAX AND FEE ADMINISTRATION (CDTFA)
CALIFORNIA FRANCHISE TAX BOARD
CAMERON COUNTY TAX ASSESSOR-COLLECTOR
CANTON TOWN TAX COLLECTOR
CHELAN COUNTY TAX COLLECTOR

CHESAPEAKE CITY TAX COLLECTOR
CHESHIRE TOWN TAX COLLECTOR
CHESTERFIELD COUNTY TAX COLLECTOR
CITY OF HOLYOKE TAX COLLECTOR
CITY OF MCALLEN
CITY OF NORTH HAVEN TAX COLLECTOR
CITY OF SAVANNAH, GEORGIA
CITY OF WORCESTER TAX COLLECTOR
CLALLAM COUNTY TAX COLLECTOR
CLARK COUNTY TREASURER'S OFFICE
CLINTON TOWN TAX COLLECTOR
COLCHESTER TOWN TAX COLLECTOR
COLLIN COUNTY TAX ASSESSOR-COLLECTOR
COLONIAL HEIGHTS CITY TAX COLLECTOR
COLORADO DEPARTMENT OF REVENUE
COMAL COUNTY TAX ASSESSOR-COLLECTOR
COMPTROLLER OF MARYLAND, REVENUE ADMINISTRATION DIVISION
CONNECTICUT DEPARTMENT OF REVENUE SERVICES
CONTRA COSTA COUNTY TAX COLLECTOR
COWLITZ COUNTY TAX COLLECTOR
CROMWELL TOWN TAX COLLECTOR
CULPEPER TOWN TAX COLLECTOR
CYPRESS-FAIRBANKS ISD TAX ASSESSOR-COLLECTOR
D.C. OFFICE OF TAX AND REVENUE
DALLAS COUNTY TAX ASSESSOR-COLLECTOR
DANBURY CITY TAX COLLECTOR
DANVILLE CITY TAX COLLECTOR
DARTMOUTH MUNICIPAL TAX COLLECTOR
DELAWARE DEPARTMENT OF FINANCE
DELAWARE DIVISION OF CORPORATIONS
DELAWARE DIVISION OF CORPORATIONS (DEPT OF REVENUE)
DENTON COUNTY TAX ASSESSOR-COLLECTOR
DENVER TREASURY DIVISION
DESOTO COUNTY TAX COLLECTOR
DISTRICT OF COLUMBIA OFFICE OF TAX AND REVENUE
DONA ANA COUNTY TAX COLLECTOR
DOUGLAS COUNTY TAX COMMISSIONER
EAST HAMPTON TOWN TAX COLLECTOR
EAST HAVEN TOWN TAX COLLECTOR
EAST LYME TOWN TAX COLLECTOR
ECTOR COUNTY TAX ASSESSOR-COLLECTOR
EL PASO COUNTY TAX ASSESSOR-COLLECTOR
ELLIS COUNTY TAX OFFICE
ERATH COUNTY TAX ASSESSOR-COLLECTOR
FAIRFIELD TOWN TAX COLLECTOR
FAIRHAVEN MUNICIPAL TAX COLLECTOR
FIRST COLONY L.I.D
FLORENCE COUNTY TREASURER'S OFFICE
FLORIDA DEPARTMENT OF REVENUE
FLUVANNA COUNTY TAX COLLECTOR
FORREST COUNTY TAX COLLECTOR
FRAMINGHAM MUNICIPAL TAX COLLECTOR
FRANKLIN COUNTY TAX COLLECTOR
FREDERICK COUNTY TAX COLLECTOR
FREDERICKSBURG CITY TAX COLLECTOR
FREETOWN MUNICIPAL TAX COLLECTOR
GALVESTON COUNTY TAX OFFICE
GEORGETOWN COUNTY TREASURER
GEORGIA DEPARTMENT OF REVENUE
GLASTONBURY TOWN TAX COLLECTOR
GLOUCESTER COUNTY TAX COLLECTOR
GRANBY TOWN TAX COLLECTOR
GRANT COUNTY TREASURER'S OFFICE
GRAYS HARBOR COUNTY TAX COLLECTOR
GROTON TOWN TAX COLLECTOR
HAMPTON CITY TAX COLLECTOR
HANOVER COUNTY TREASURER
HARRIS COUNTY TAX ASSESSOR-COLLECTOR
HARRISON COUNTY TAX COLLECTOR
HARTFORD CITY TAX COLLECTOR
HARWICH MUNICIPAL TAX COLLECTOR
HAWAII DEPARTMENT OF TAXATION
HAYS COUNTY TAX ASSESSOR-COLLECTOR
HENRICO COUNTY TAX COLLECTOR
HIDALGO COUNTY TAX ASSESSOR-COLLECTOR
HINDS COUNTY TAX COLLECTOR
HOLYOKE MUNICIPAL TAX COLLECTOR
HOPEWELL CITY TAX COLLECTOR
HUMBLE ISD TAX OFFICE
IDAHO STATE TAX COMMISSION
ILLINOIS DEPARTMENT OF REVENUE
INDIANA DEPARTMENT OF REVENUE
IOWA DEPARTMENT OF REVENUE
ISLAND COUNTY TAX COLLECTOR
ISLE OF WIGHT COUNTY TAX COLLECTOR
JAMES CITY COUNTY TAX COLLECTOR
JEFFERSON COUNTY TAX ASSESSOR-COLLECTOR
JOHNSTON COUNTY TAX OFFICE
JOHNSTON COUNTY TREASURER
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
KANSAS DEPARTMENT OF REVENUE
KENTUCKY DEPARTMENT OF REVENUE
KING COUNTY TAX COLLECTOR
KITSAP COUNTY TAX COLLECTOR
LACLEDE COUNTY TAX COLLECTOR
LAMAR COUNTY TAX COLLECTOR
LAREDO ISD TAX OFFICE
LAUDERDALE COUNTY TAX COLLECTOR

LEE COUNTY TAX COLLECTOR
LEFLORE COUNTY ASSESSOR
LOS ANGELES COUNTY TAX COLLECTOR
LOUDOUN COUNTY TAX COLLECTOR
LOUISIANA DEPARTMENT OF REVENUE
LUBBOCK COUNTY TAX ASSESSOR-COLLECTOR
LYNCHBURG CITY TAX COLLECTOR
MADISON TOWN TAX COLLECTOR
MAINE REVENUE SERVICES
MANATEE COUNTY TAX COLLECTOR
MANCHESTER TOWN TAX COLLECTOR
MARICOPA COUNTY TREASURER
MARIN COUNTY TAX COLLECTOR
MARYLAND COMPTROLLER OF THE TREASURY
MARYLAND DEPT OF ASSESSMENTS & TAXATION
MASON COUNTY TREASURER
MASSACHUSETTS DEPARTMENT OF REVENUE
MERIDEN CITY TAX COLLECTOR
MICHIGAN DEPARTMENT OF TREASURY
MIDDLETOWN CITY TAX COLLECTOR
MILFORD CITY TAX COLLECTOR
MILFORD MUNICIPAL TAX COLLECTOR
MINNESOTA DEPARTMENT OF REVENUE
MISSISSIPPI DEPARTMENT OF REVENUE
MISSOURI DEPARTMENT OF REVENUE
MODIOHEALTH, INC.
MONROE TOWN TAX COLLECTOR
MONTANA DEPARTMENT OF REVENUE
MONTGOMERY COUNTY TAX ASSESSOR-COLLECTOR
NAUGATUCK CITY TAX COLLECTOR
NEBRASKA DEPARTMENT OF REVENUE
NEW BRITAIN CITY TAX COLLECTOR
NEW FAIRFIELD TOWN TAX COLLECTOR
NEW HAMPSHIRE DEPARTMENT OF REVENUE ADMINISTRATION
NEW HAVEN CITY TAX COLLECTOR
NEW JERSEY DEPARTMENT OF THE TREASURY
NEW JERSEY DIVISION OF TAXATION
NEW MEXICO DEPARTMENT OF TRANSPORTATION
NEW MEXICO PUBLIC REGULATION COMMISSION
NEW MEXICO TAXATION AND REVENUE DEPARTMENT
NEW MILFORD TOWN TAX COLLECTOR
NEW YORK CITY DEPARTMENT OF FINANCE
NEW YORK STATE DEPARTMENT OF TAXATION AND FINANCE
NEWINGTON TOWN TAX COLLECTOR
NEWPORT NEWS CITY TAX COLLECTOR
NEWTON MUNICIPAL TAX COLLECTOR
NEWTOWN TOWN TAX COLLECTOR
NORFOLK CITY TAX COLLECTOR
NORTH ADAMS MUNICIPAL TAX COLLECTOR
NORTH ANDOVER MUNICIPAL TAX COLLECTOR
NORTH BRANFORD TOWN TAX COLLECTOR
NORTH CAROLINA DEPARTMENT OF REVENUE
NORTH HAVEN TOWN TAX COLLECTOR
NORTHBOROUGH MUNICIPAL TAX COLLECTOR
NORTON CITY TAX COLLECTOR
NORWALK CITY TAX COLLECTOR
NORWICH CITY TAX COLLECTOR
NUECES COUNTY TAX ASSESSOR-COLLECTOR
OAK PARK CITY TREASURER (OAKLAND)
OFFICE OF LONG-TERM LIVING
OHIO DEPARTMENT OF TAXATION
OKANOGAN COUNTY TAX COLLECTOR
OKLAHOMA TAX COMMISSION
OLD SAYBROOK TOWN TAX COLLECTOR
ONSLOW COUNTY TAX COLLECTOR
ORANGE COUNTY TAX COLLECTOR
ORANGE TOWN TAX COLLECTOR
OREGON DEPARTMENT OF REVENUE
ORLEANS MUNICIPAL TAX COLLECTOR
PARKER COUNTY APPRAISAL DISTRICT
PENNSYLVANIA DEPARTMENT OF REVENUE
PETERSBURG, VIRGINIA, COMMISSIONER OF THE REVENUE
PIERCE COUNTY TAX COLLECTOR
PIMA COUNTY TREASURER
PITTSFIELD MUNICIPAL TAX COLLECTOR
POQUOSON CITY TAX COLLECTOR
PORTSMOUTH CITY TAX COLLECTOR
POTTER COUNTY TAX ASSESSOR-COLLECTOR
POTTSVILLE CITY HALL
PUTNAM TOWN TAX COLLECTOR
RANKIN COUNTY TAX COLLECTOR
REEVES COUNTY APPRAISAL DISTRICT
RHODE ISLAND DIVISION OF TAXATION
RICHMOND CITY TAX COLLECTOR
RIDGEFIELD TOWN TAX COLLECTOR
ROANOKE CITY TAX COLLECTOR
ROCKY HILL TOWN TAX COLLECTOR
RUTHERFORD COUNTY TAX COLLECTOR
SAN DIEGO COUNTY TAX COLLECTOR
SAN MATEO COUNTY TAX COLLECTOR
SANDWICH MUNICIPAL TAX COLLECTOR
SAULT SAINTE MARIE CITY TREASURER (CHIPPEWA)
SEYMOUR TOWN TAX COLLECTOR

SHELBY COUNTY OCCUPATIONAL LICENSE FEE OFFICE
SHELTON CITY TAX COLLECTOR
SIMSBURY TOWN TAX COLLECTOR
SOLANO COUNTY TREASURY
SOUTH CAROLINA
SOUTH CAROLINA DEPARTMENT OF REVENUE
SOUTHBURY TOWN TAX COLLECTOR
SOUTHINGTON TOWN TAX COLLECTOR
SPOKANE COUNTY TAX COLLECTOR
SPOTSYLVANIA COUNTY TAX COLLECTOR
SPRING ISD TAX OFFICE
SPRINGFIELD CITY TAX COLLECTOR
STAFFORD COUNTY TAX COLLECTOR
STAMFORD CITY TAX COLLECTOR
STANISLAUS COUNTY TREASURER-TAX COLLECTOR
STRATFORD TOWN TAX COLLECTOR
SWAMPSCOTT MUNICIPAL TAX COLLECTOR
TARRANT COUNTY TAX ASSESSOR-COLLECTOR
TAYLOR COUNTY TAX COLLECTOR
TENNESSEE DEPARTMENT OF REVENUE
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
TEXAS CONTROLLER OF PUBLIC ACCOUNTS
TEXAS DEPARTMENT OF LICENSING AND REGULATION
THE AGENCY FOR HEALTH CARE ADMINISTRATION
THURSTON COUNTY TAX COLLECTOR
TOM GREEN COUNTY APPRAISAL DISTRICT
TOMBALL ISD TAX OFFICE
TORRINGTON CITY TAX COLLECTOR
TOWN OF BRATTLEBORO
TOWNSHIP OF NEPTUNE NEW JERSEY
TRAVIS COUNTY TAX ASSESSOR-COLLECTOR
TREASURER-STATE OF NEW JERSEY
TRUMBULL TOWN TAX COLLECTOR
U.S. DEPARTMENT OF THE TREASURY
UTAH STATE TAX COMMISSION
VERMONT DEPARTMENT OF TAXES
VERNON TOWN TAX COLLECTOR
VIRGINIA DEPARTMENT OF TAXATION
WALLA WALLA COUNTY TAX COLLECTOR
WALLINGFORD TOWN TAX COLLECTOR
WARREN COUNTY TAX COLLECTOR
WASHINGTON DEPARTMENT OF REVENUE
WATER VALLEY CITY TAX COLLECTOR
WATERBURY CITY TAX COLLECTOR
WATERFORD TOWN TAX COLLECTOR
WATERTOWN TOWN TAX COLLECTOR
WEBB COUNTY TAX ASSESSOR-COLLECTOR
WEST HAVEN CITY TAX COLLECTOR
WEST VIRGINIA STATE TAX DEPARTMENT
WESTPORT TOWN TAX COLLECTOR
WETHERSFIELD TOWN TAX COLLECTOR
WHATCOM COUNTY TAX COLLECTOR
WICHITA COUNTY TAX ASSESSOR-COLLECTOR
WILLIAMSON COUNTY TRUSTEE'S OFFICE
WILSON COUNTY TRUSTEE
WILTON TOWN TAX COLLECTOR
WINCHESTER TOWN TAX COLLECTOR
WINDHAM TOWN TAX COLLECTOR
WINDSOR TOWN TAX COLLECTOR
WINTERVILLE CITY TAX COLLECTOR
WISCONSIN DEPARTMENT OF REVENUE
WOBURN MUNICIPAL TAX COLLECTOR
WOLCOTT TOWN TAX COLLECTOR
YAKIMA COUNTY TAX COLLECTOR
YALOBUSHA COUNTY TAX COLLECTOR
YORK COUNTY TAX COLLECTOR

SCHEDULE 2

White & Case's Relationships with Potential Parties in Interest

Category	Name	Open/ Close
Bondholders	Alliancebernstein Holding Lp	Open
Insurance Parties	Alliant Insurance Services, Inc.	Open
Insurance Parties	Allianz Global Risks Us Insurance Company	Open
Top 30 Unsecured Creditors	Amazon Web Services, Inc.	Open
Major Suppliers and Vendors	American Express	Open
Surety Bond Issuers & Beneficiaries	Amerigroup Partnership Plan, Llc	Open
Utilities	AT&T	Open
Utilities	AT&T Mobility	Open
Employee Insurance Program Administrators	Automatic Data Processing, Inc.	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Bank of America, N.A.	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Barclays Bank Plc	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Beach Point Capital Management	Open
Bondholders	Blackrock	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	BNP Paribas S.A.	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Brigade Capital Management	Open
Bondholders	Canadian Imperial Bank	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	CIBC Bank Usa	Closed
Debtors' Banks	Citizens Bank, N.A.	Open
Major Equity Holders	Coliseum Capital Management, Llc	Closed
Utilities	Comcast	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Comerica Bank	Open
Major Equity Holders Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders Trustees, Agents, Secured Lenders, and Potential Lienholders	D.E. Shaw & Co	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Deutsche Bank Ag New York Branch	Open
Surety Bond Issuers & Beneficiaries	Elevance Health, Inc.	Open
Employee Insurance Program Administrators	Esis, Inc.	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Fiam LLC An Affiliate Of Fidelity Investments	Open
Insurance Parties	Fireman's Fund Insurance Company (Allianz)	Open
Insurance Parties	Fireman's Fund Insurance Company	Open
Utilities	Firstenergy Corp	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Hewlett-Packard Financial Services Company	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Hg Vora Capital Management	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	HSBC Bank Plc	Open
Debtors' Banks	HSBC Holdings Plc.	Open
Landlords	Huron Group Inc	Closed
Utilities	Iron Mountain	Open
Utilities	Iron Mountain Incorporated	Open

Trustees, Agents, Secured Lenders, and Potential Lienholders	Jefferies Finance LLC	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	JP Morgan Chase Bank, N.A.	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Jupiter Asset Management	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Keybank, National Association	Open
Debtors' Ordinary Course Professionals	KPMG LLP	Open
Professionals for Other Major Stakeholders	Lazard Freres & Co. LLC	Closed
Employee Insurance Program Administrators	Metlife, Inc.	Open
Utilities	Monongahela Power Co	Open
Debtors' Banks	Morgan Stanley	Open
Utilities	National Grid	Closed
Insurance Parties	National Union Fire Insurance Company Of Pittsburgh, Pa. (AIG)	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Neuberger Berman Group	Open
Utilities	Nyseg	Closed
Surety Bond Issuers & Beneficiaries	Oklahoma Complete Health, Inc. C/O Centene Corporation	Open
Utilities	Pennsylvania Electric Company	Open
Debtors' Banks	PNC Bank, N.A.	Closed
Debtors' Ordinary Course Professionals	Pricewaterhouse Coopers LLP	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Redwood Capital Management	Closed
Landlords	Regus	Open
Major Suppliers and Vendors	Salesforce.Com Inc	Open
Bondholders	State Street	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Sumitomo Mitsui Banking Corporation	Open
Bondholders Trustees, Agents, Secured Lenders, and Potential Lienholders	Tcw Group	Open
Major Equity Holders	The Vanguard Group, Inc.	Open
Insurance Parties Surety Bond Issuers & Beneficiaries	Travelers Casualty And Surety Company Of America	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Truist Bank	Open
Debtors' Banks	Truist Financial Corporation	Open
Debtors' Banks	U.S. Bancorp	Closed
Employee Insurance Program Administrators	Voya Financial, Inc.	Open
Debtors' Banks Trustees, Agents, Secured Lenders, and Potential Lienholders	Wells Fargo Bank, N.A.	Open
Surety Bond Issuers & Beneficiaries	Westchester Fire Insurance Company	Closed
Top 30 Unsecured Creditors	Wilmington Savings Fund Society, Fsb	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Wilmington Trust	Open
Major Suppliers and Vendors	Workday Inc	Open
Top 30 Unsecured Creditors	WSFS Bank	Closed
Insurance Parties	Xl Specialty Insurance Company	Closed

EXHIBIT C

Committee Declaration

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

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

DECLARATION OF DAVID ROWE IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

Pursuant to 28 U.S.C. § 1746, I, David Rowe, as an authorized signatory of Jupiter Asset Management, chairperson of the Official Committee of Unsecured Creditors (the "**Committee**") hereby declare, as follows:

1. I am an authorized representative of Jupiter Asset Management. Jupiter Asset Management is an unsecured creditor of the Debtors and a member of the Committee appointed in the above-captioned chapter 11 cases. I submit this declaration (the "**Declaration**") in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of*

[1] A complete list of each of the Debtors in the 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.

September 9, 2025 (the "**Application**").[2] I have reviewed and am familiar with the Application. I am in all respects competent to make this Declaration in support of the Application. Except as otherwise noted, I have personal knowledge as to all the information set forth below.

IDENTITY OF DECLARANT

2. On August 20, 2025 (the "**Petition Date**"), the Debtors filed with the Court a voluntary petition for relief under the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases.

3. On September 5, 2025, the Office of the United States Trustee for Region 7 (the "**U.S. Trustee**") appointed the Committee, pursuant to section 1102(a) of the Bankruptcy Code, to represent the interests of all creditors holding unsecured claims in these Chapter 11 Cases. [Docket No. 124]. As of the date hereof, the members of the Committee are: (i) Wilmington Savings Fund Society, FSB, as indenture trustee for the Unsecured Notes;[3] (ii) Madison Avenue International LP; (iii) Jupiter Asset Management; (iv) Uber Health, LLC; (v) MedEx Medical Transport Service, Inc.; (vi) Randstad North America; and (vii) Marquis Hines.

4. On September 9, 2025, the Committee voted to retain White & Case as its counsel, subject to Bankruptcy Court approval. As a representative of a member of the Committee, I was directly involved in the decision to retain White & Case as the Committee's counsel in these

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2 Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms in the Application.

3 On August 24, 2021, Debtor ModivCare Escrow Issuer, Inc. issued $500 million aggregate principal amount of 5.00% senior unsecured notes due October 1, 2029 (the "**Unsecured Notes**").

Chapter 11 Cases and actively participated in negotiating the terms of White & Case's employment.

STEPS TAKEN TO ENSURE COMPARABILITY OF ENGAGEMENT TERMS AND RATE STRUCTURE

5. I have confirmed with White & Case that, while its billing rates vary among attorneys based on the attorney's seniority and position with the firm (e.g., partner, counsel, associate), years of experience, and the demand for services in the attorney's particular area of expertise, its billing rates do not vary as a function of whether the services performed relate to a bankruptcy engagement or a nonbankruptcy engagement.

6. White & Case has informed the Committee that its rates for bankruptcy representations are consistent with and comparable to the rates White & Case charges for nonbankruptcy representations. White & Case has informed the Committee that its current hourly rates apply to non-bankruptcy services, if any, provided by the Firm, unless an alternative fee arrangement (such as a contingent fee, mixed contingent fee, flat fee, or blended rate arrangement) is agreed upon. White & Case has informed the Committee that its attorneys will not charge a premium or in any way increase their hourly rates over the fees charged to nonbankruptcy clients.

7. The Committee is satisfied that White & Case has set its hourly rates for its attorneys and paraprofessionals at comparable levels to those charged by its competitor firms. Based on these representations and the Committee members' experience in both the bankruptcy field and in other fields in which the Debtors operate, I believe these rates are reasonable.

SELECTION OF WHITE & CASE AS COMMITTEE COUNSEL

8. On or about September 5, 2025, the Committee decided to retain counsel. After careful consideration, the Committee selected White & Case to serve as its counsel based upon White & Case's expertise in cases such as these Chapter 11 Cases. The Committee found that

White & Case is well suited to represent the Committee in these Chapter 11 Cases based on White & Case's extensive experience in chapter 11 matters, including its experience and knowledge in the areas of debtor's protections, creditors' rights, and business reorganizations under chapter 11 of the Bankruptcy Code.

OTHER CIRCUMSTANCES WARRANTING WHITE & CASE'S RETENTION

9. The Committee selected White & Case as counsel because of the firm's extensive restructuring experience and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. White & Case also demonstrated its firm-wide connections to jurisdictions in which the Debtors operate globally and its firm-wide experience. White & Case's presentation made clear it is the best suited for providing legal services to the Committee for the duration of these Chapter 11 Cases.

PROCEDURES ESTABLISHED TO SUPERVISE FEES AND EXPENSES AND MANAGE COSTS

10. Throughout these Chapter 11 Cases, the Committee will supervise White & Case's incurred fees and expenses and review White & Case's monthly invoices and applications for payment of fees and reimbursement of expenses. The Committee understands and consents to the fact that White & Case historically increases its hourly billing rates for its professionals and paraprofessionals on a yearly basis.

11. White & Case has informed me that it will work closely with other professionals that may be retained by the Committee, taking whatever steps are necessary and appropriate to avoid any unnecessary duplication of effort with such other professionals.

12. The Committee understands that White & Case reserves all rights to contest any such objection raised to the allowance or payments of its requested fees and expenses, and the Committee reserves the right to retain conflicts counsel to prosecute any such fee objection.

13. Nothing contained herein is intended to limit White & Case's ability to request allowance and payment of fees and expenses pursuant to sections 330 and 331 of the Bankruptcy Code, to restrict White & Case's right to defend any objection raised to the allowance or payment of such fees, nor to restrict the Committee's right to retain conflicts counsel to prosecute any such fee objection to the extent it is not resolved informally by the parties or raised by another party in interest, such as the U.S. Trustee.

14. Based on the foregoing, I am of the opinion that it is necessary to employ White & Case and that such employment is in the best interest of the Committee.

15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 8, 2025

Respectfully submitted,

/*s/ David Rowe*
Name: David Rowe

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)
Debtors. [1]	§	(Jointly Administered)

APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The Official Committee of Unsecured Creditors (the "***Committee***") of ModivCare Inc., *et al*. (the "***Debtors***"), appointed pursuant to section 1102 of title 11 of the United States Code (the "***Bankruptcy Code***") hereby submits this application (the "***Application***") for the entry of an order (the "***Proposed Order***"), substantially in the form attached hereto as **Exhibit A**, authorizing the Committee to retain and employ AlixPartners, LLP ("***AlixPartners***") as its financial advisor in connection with these chapter 11 cases (these "***Chapter 11 Cases***"), pursuant to the terms of the engagement letter by and among the Committee and AlixPartners, dated as of September 10, 2025

[1] A complete list of each of the Debtors in these 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.

(the "***Engagement Letter***"), a copy of which is attached hereto as **Exhibit B**, effective as of September 10, 2025. In support of this Application, the Committee submits the declaration of David MacGreevey (the "***MacGreevey Declaration***"), a Partner and Managing Director of AlixPartners, LLP, attached hereto as **Exhibit C**.

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "***Court***") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A). The Committee confirms its consent, pursuant to rule 7008 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue of these Chapter 11 Cases and this Application is proper in this district under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 328(a) and 1103 of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas, Houston Division (the "***Local Rules***"), and the Procedures for Complex Chapter 11 Cases in the Southern District of Texas.

Background

4. On August 20, 2025, (the "***Petition Date***"), each of the Debtors commenced a case under chapter 11 of the Bankruptcy Code. The Debtors' Chapter 11 Cases have been consolidated for procedural purposes only and are being administered jointly. The Debtors are authorized to continue operating their businesses and managing their properties as debtors-in-possession

pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been requested or appointed in these Chapter 11 Cases.

5. On September 5, 2025, pursuant to Bankruptcy Code sections 1102(a) and 1102(b)(1), the United States Trustee for the Southern District of Texas, Houston Division (the "***U.S. Trustee***") appointed the Committee [Docket No. 124]. The Committee is currently comprised of the following seven (7) members: (i) Wilmington Savings Fund Society, FSB, as indenture trustee for the Unsecured Notes;[2] (ii) Madison Avenue International LP; (iii) Jupiter Asset Management; (iv) Uber Health, LLC; (v) MedEx Medical Transport Service, Inc.; (vi) Randstad North America; and (vii) Marquis Hines.

6. On September 9, 2025, the Committee selected White & Case LLP ("***White & Case***") to serve as its counsel, subject to Court approval.

7. On September 10, 2025 (the "***Retention Date***"), the Committee selected AlixPartners to serve as its financial advisor effective as of the Retention Date, subject to Court approval.

Relief Requested

8. By this Application, the Committee seeks entry of the Proposed Order authorizing and approving the retention and employment of AlixPartners as its financial advisor, pursuant to sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1, in accordance with the terms of the Proposed Order and Engagement Letter.

9. Section 328(a) of the Bankruptcy Code empowers a committee appointed under section 1102 of the Bankruptcy Code, with the Court's approval, to employ professionals on any

[2] On August 24, 2021, Debtor ModivCare Escrow Issuer, Inc. issued $500 million aggregate principal amount of 5.00% senior unsecured notes due October 1, 2029 (the "**Unsecured Notes**").

reasonable terms and conditions of employment to perform services for the Committee in the discharge of such Committee's duties.

AlixPartners' Qualifications

10. AlixPartners is an internationally recognized restructuring and turnaround firm with substantial experience in providing financial advisory services and has an excellent reputation for its work in large and complex chapter 11 cases on behalf of debtors and creditors throughout the United States. AlixPartners performs critical services that complement the services provided by the Committee's other professionals. AlixPartners is able to represent the Committee in a cost-effective, efficient and timely manner and has been performing such services since the Retention Date.

11. AlixPartners is well-qualified to serve as a financial advisor to the Committee. AlixPartners has assisted, advised, and provided strategic advice to debtors, creditors, bondholders, investors, and other entities in numerous chapter 11 cases of similar size and complexity to these Chapter 11 Cases. Its professionals have provided restructuring, financial advisory or crisis management services in numerous large cases, including recent filings in this district. *See, e.g., In re Ascend Performance Materials Holdings Inc.*, No. 25-90127 (CML) (Bankr. S.D. Tex. July 9, 2025); *In re Vertex Energy, Inc.*, No. 24-90507 (CML) (Bankr. S.D. Tex. Dec. 16, 2024); *In re Benefytt Techs., Inc.*, No. 23-90566 (CML) (Bankr. S.D. Tex. Aug. 3, 2023); *In re Altera Infrastructure L.P.*, No. 22-90129 (MI) (Bankr. S.D. Tex. Oct. 24, 2022); *In re GWG Holdings, Inc.*, No. 22-90032 (MI) (Bankr. S.D. Tex. Jul. 19, 2022); *In re Ion Geophysical Corp.*, No. 22-30987 (MI) (Bankr. S.D. Tex. Jun. 16, 2022); *In re CBL & Assocs. Props., Inc.*, No. 20-35226 (DRJ) (Bankr. S.D. Tex. Jan. 8, 2021); *In re Chesapeake Energy Corp.*, No. 20-33233 (CML) (Bankr. S.D. Tex. Sept. 21, 2020); *In re CARBO Ceramics Inc.*, No. 20-31973 (MI) (Bankr.

S.D. Tex. June 30, 2020); *In re EP Energy Corp.*, No. 19-35654 (MI) (Bankr. S.D. Tex. Jan. 8, 2020).

Services to be Provided

12. AlixPartners has begun to provide assistance to the Committee in accordance with the terms and conditions set forth in the MacGreevey Declaration and in the Engagement Letter.

13. It is presently anticipated that AlixPartners will continue to provide advice to and assist the Committee in evaluating and implementing strategic and tactical options through the bankruptcy and restructuring process. A general list of tasks AlixPartners may perform is as follows:

- Review and evaluate the Debtors' current financial condition, business plans and cash and financial forecasts, and periodically report to the Committee regarding the same.
- Review the Debtors' cash management, tax sharing and intercompany accounting systems, practices and procedures.
- Evaluate any proposed sale process and related bids, and participate in any meetings with bidders or auction, as required.
- Review and investigate: (i) related party transactions, including those between the Debtors and non-debtor subsidiaries and affiliates (including, but not limited to, shared services expenses and tax allocations) and (ii) selected other prepetition transactions.
- Identify and/or review potential preference payments, fraudulent conveyances and other causes of action that the various Debtors' estates may hold against third parties, including each other.
- Analyze the Debtors' assets and claims and assess potential recoveries to the various creditor constituencies under different scenarios.
- Provide valuation and litigation support services in connection with the preparation of valuation analyses and/or expert reports, as well as related expert testimony.
- Assist in the development and/or review of the Debtors' restructuring support agreement, plan of reorganization and disclosure statement.
- Review and evaluate court motions filed or to be filed by the Committee, the Debtors, or any other parties-in-interest, as appropriate.

- Render expert testimony and litigation support services, as requested from time to time by the Committee and its counsel, regarding any of the matters to which AlixPartners is providing services.
- Attend Committee meetings and Bankruptcy Court hearings as may be required in the role of advisors to the Committee.
- Support eDiscovery obligations including in conjunction with document requests, subpoenas, or other discovery requirements, such as forensic data acquisition and analysis, data processing, monthly secure data hosting, review and analysis, and productions, and any other eDiscovery needs requested by the Committee.
- Assist with such other matters as may be requested that fall within AlixPartners' expertise and are mutually agreeable.

14. When necessary, the individuals working on this matter (the "***AlixPartners Personnel***") will be assisted by or replaced by various other AlixPartners professionals at various levels.

No Duplication of Services

15. AlixPartners will work closely with White & Case to ensure that there will be no duplication of efforts or unnecessary overlap in the services to be provided by AlixPartners and those that have been provided or will be provided by any of the Committee's other professionals.

Fee and Expense Structure

16. AlixPartners' decision to accept this engagement to advise and assist the Committee is conditioned upon its ability to be retained in accordance with its customary terms and conditions of employment, compensated for its services, and reimbursed for the out-of-pocket expenses it incurs in accordance with its customary billing practices, as set forth in ***Schedule 1*** of the Engagement Letter (the "***Fee and Expense Structure***") as modified by the Proposed Order to comply with the practices and requirements of the Court.

17. AlixPartners' current standard hourly rates, subject to periodic adjustments, are as follows:

Title	Hourly Rate
Partner/ Partner & Managing Director	$1,225 – $1,540
Senior Vice President/ Director	$850 – $1,150
Vice President	$650 – $835
Analyst/ Consultant	$250 – $640

18. AlixPartners generally reviews and revises its billing rates semi-annually. Changes in applicable hourly rates will be noted on the invoices for the first time period in which the revised rates became effective.

19. To the extent the Committee requests services related to electronic discovery and data collection, certain fees will apply as further outlined by the Engagement Letter.

20. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

21. In addition to compensation for professional services rendered by AlixPartners Personnel, AlixPartners will seek reimbursement for reasonable and necessary expenses incurred in connection with these Chapter 11 Cases, including transportation costs, lodging, and meals.

22. AlixPartners intends to apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases, subject to the Court's approval and in compliance with the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (Appendix A to

28 C.F.R. § 58) (collectively, the "***Fee Guidelines***"), applicable provisions of the Bankruptcy Code, including sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court, both in connection with this Application and the interim and final fee applications to be filed by AlixPartners in these Chapter 11 Cases.

23. AlixPartners will maintain records in support of any fees (in 1/10th of an hour increments), costs, and expenses incurred in connection with services rendered in these Chapter 11 Cases. Records will be arranged by category and nature of the services rendered and will include reasonably detailed descriptions of those services provided on behalf of the Committee. AlixPartners' applications for compensation of fees and reimbursement of expenses will be paid by the Debtors pursuant to the terms of the Engagement Letter and any procedures established by the Court, pursuant to an interim compensation order or otherwise.

24. AlixPartners does not seek a success fee in connection with these Chapter 11 Cases.

25. AlixPartners is not owed any amounts with respect to prepetition fees and expenses in connection with these Chapter 11 Cases.

26. Neither White & Case, the members of the Committee, nor any of their agents are or shall be responsible for the payment of AlixPartners' fees and costs arising out of the engagement described and referenced herein, regardless of whether or not AlixPartners is paid in full from the Debtors' estates.

27. The Fee and Expense Structure is consistent with and typical of compensation arrangements entered into by AlixPartners and other comparable firms that render similar services. The Committee believes that the Fee and Expense Structure is reasonable, market-based, and designed to compensate AlixPartners fairly for its work, and to cover fixed and routine expenses.

AlixPartners' Disinterestedness

28. To the best of the Committee's knowledge, and, except to the extent disclosed herein and in the MacGreevey Declaration, AlixPartners: (a) is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code; (b) has no connection to the Debtors, their creditors, or other parties in interest in these Chapter 11 Cases, or the attorneys or accountants of the foregoing, or the U.S. Trustee or any person employed in the Office of the U.S. Trustee; and (c) does not hold any interest adverse to the Debtors' estates.

29. As set forth in further detail in the MacGreevey Declaration, AlixPartners has certain connections with creditors, equity security holders, and other parties in interest in these Chapter 11 Cases. AlixPartners does not believe that any of these connections represent an interest materially adverse to the Debtors' estates or otherwise create a conflict of interest regarding the Debtors or these Chapter 11 Cases.

30. In the event that AlixPartners learns of additional connections not reflected in the MacGreevey Declaration, AlixPartners will use reasonable efforts to promptly file a supplemental declaration.

Indemnification Provisions

31. The Engagement Letter contains standard indemnification language with respect to AlixPartners' services including, without limitation, an agreement by the Committee to have the Debtors indemnify AlixPartners and its affiliates, partners, directors, officers, employees and agents (each, an "***AlixPartners Party***" and collectively, the "***AlixPartners Parties***") from and against all claims, liabilities, losses, expenses and damages arising out of or in connection with the engagement of AlixPartners that is the subject of the Engagement Letter, except to the extent caused by gross negligence, willful misconduct, or fraud of any AlixPartners Party.

32. The Committee and AlixPartners believe that the indemnification provisions contained in the Engagement Letter, as may be amended in the Proposed Order, are customary and reasonable for AlixPartners and comparable firms providing financial advisory services, and as would be modified pursuant to the foregoing limitations, reflect the qualifications and limitations on indemnification provisions that are customary in this district and others.

33. Moreover, the terms and conditions of the indemnification provisions were negotiated by AlixPartners at arm's length and in good faith. The provisions contained in the Engagement Letter, viewed in conjunction with the other terms of AlixPartners' proposed retention, are reasonable and in the best interest of the Debtors, their estates, and all parties in interest. Accordingly, as part of this Application, the Committee requests that the Court approve the indemnification provisions as set forth in the Engagement Letter, as may be amended by the Proposed Order.

Notice

34. Notice of this Application has been provided to: (a) the Debtors; (b) the Office of the U.S. Trustee; (c) the holders of the thirty (30) largest unsecured claims against the Debtors (on a consolidated basis); (d) the United States Attorney's Office for the Southern District of Texas; (e) the Internal Revenue Service; (f) the United States Securities and Exchange Commission; (g) the state attorneys general for states in which the Debtors conduct business; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Local Rule 9013-1(d). The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE the Committee respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and proper.

Date: October 8, 2025

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF MODIVCARE INC., *ET AL*.

By: *David Rowe*, not in his individual capacity but solely on behalf of the Official Committee of Unsecured Creditors of ModivCare Inc., *et al*. and not in any other capacity

Filed By:

/s/ Charles R. Koster

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Proposed Counsel to the Official Committee of Unsecured Creditors

EXHIBIT A

Proposed Order

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)
Debtors. [1]	§	(Jointly Administered)

ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO EMPLOY AND RETAIN ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025
[Relates to Docket No. ___]

Upon the application (the "***Application***")[2] of the Official Committee of Unsecured Creditors (the "***Committee***") appointed in these Chapter 11 Cases of the above-captioned Debtors (the "***Debtors***") for entry of an order (this "***Order***"), pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the "***Bankruptcy Code***"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***") and rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas, Houston Division (the "***Local Rules***"), authorizing the Committee to employ and retain AlixPartners, LLP ("***AlixPartners***") as the Committee's financial advisor, effective as of September 10, 2025; and upon consideration of the Declaration of David MacGreevey (the "***MacGreevey Declaration***"); and it appearing that AlixPartners is "disinterested" and eligible for retention pursuant to sections 101(14) and 328(c)

[1] A complete list of each of the Debtors in these 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.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

of the Bankruptcy Code; and the Court having found the terms and conditions of AlixPartners' employment, including, but not limited to, the Fee and Expense Structure set forth in the Engagement Letter and Application, are reasonable under section 330 of the Bankruptcy Code; and the Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue of this case and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Application; and the Court having held a hearing on the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Application is in the best interest of the Debtors, their estates, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation, and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is approved as set forth in this Order.

2. Pursuant to sections 328(a) and 1103 of the Bankruptcy Code, the Committee is authorized to employ and retain AlixPartners as its financial advisor in connection with these Chapter 11 Cases effective as of September 10, 2025, and in accordance with the terms and conditions set forth in the Engagement Letter attached to the Application as **Exhibit B**.

3. The terms of the Engagement Letter, including, without limitation, the indemnification provisions, are reasonable, and the conditions of employment are approved in all respects, as modified by this Order.

4. AlixPartners may file monthly and interim requests for allowance of compensation and reimbursement of expenses and shall file final requests for allowance of compensation and reimbursement of expenses (collectively, the "***Fee Applications***"). AlixPartners' Fee Applications shall comply with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and Local Rules, the Fee Guidelines and any other such procedures as may be fixed by order of the Court. AlixPartners shall keep its time in one-tenth (1/10) hour increments.

5. AlixPartners' compensation terms set forth in the Engagement Letter, including, without limitation, the Fee and Expense Structure, are approved, and the Debtors shall be bound by such terms. AlixPartners shall be compensated for the services identified in the Application, the MacGreevey Declaration and the Engagement Letter and reimbursed for out-of-pocket expenses incurred in connection with such services, pursuant to section 328(a) of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court.

6. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

7. The indemnification provisions included in the Engagement Letter are approved, subject to the following:

a. No AlixPartners Party (as that term is defined in the Engagement Letter) shall be entitled to indemnification, contribution, or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution, or reimbursement therefore are approved by the Court.

b. The Debtors shall have no obligation to indemnify AlixPartners, or provide contribution or reimbursement to AlixPartners, for any claim or expense that is either: (i) judicially determined (the determination having become final and no longer subject to appeal) to have arisen from AlixPartners Party's gross negligence, bad faith, fraud, or willful misconduct; or (ii) settled prior to a judicial determination as to AlixPartners gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by the Court after notice and hearing to be a claim or expense for which the AlixPartners Party should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter, as modified by this Order.

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in these Chapter 11 Cases (that order having become a final order no longer subject to appeal) and (ii) the entry of an order closing these Chapter 11 Cases, an AlixPartners Party believes that it is entitled to the payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution and/or reimbursement obligations under the Engagement Letter (as modified by this Order), including, without limitation, the advancement of defense costs, the AlixPartners Party must file an application therefor in the Court, and the Debtors may not pay any such amounts to the AlixPartners Party before the entry of an order by the Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by any AlixPartners Party for indemnification, contribution and/or reimbursement, and is not a provision limiting the duration of the Debtors' obligation to indemnify, or make contributions or reimbursements to, AlixPartners. All parties in interest shall retain the right to object to any demand by any AlixPartners Party for indemnification, contribution and/or reimbursement.

8. Any limitation of liability set forth in the Engagement Letter, or otherwise, is hereby eliminated for the duration of these Chapter 11 Cases.

9. The relief granted herein shall be binding upon any chapter 11 trustee appointed in these Chapter 11 Cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of these Chapter 11 Cases to cases under chapter 7.

10. To the extent there is any inconsistency between this Order, the Engagement Letter and the Application, the terms of this Order shall govern.

11. AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases.

12. The Committee and AlixPartners are authorized and empowered to take all necessary actions to implement the relief granted in this Order.

13. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025

_____
THE HONORABLE ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Engagement Letter

AlixPartners

September 11, 2025

To: The Official Committee of Unsecured Creditors of ModivCare Inc.

Re: Agreement for Consulting Services

Dear Committee Members:

This letter, together with the attached Schedule(s) and General Terms and Conditions, sets forth the agreement ("Agreement") between AlixPartners, LLP ("AlixPartners"), and the Official Committee of Unsecured Creditors (the "Committee") of ModivCare Inc. and certain of its affiliates and subsidiaries (the "Company") for the engagement of AlixPartners to provide consulting services to the Committee with respect to the Company's Chapter 11 reorganization cases currently pending before the United States Bankruptcy Court for the Southern District of Texas ("Bankruptcy Court").

All defined terms shall have the meanings ascribed to them in this letter and in the attached Schedule(s) and General Terms and Conditions. The Committee and AlixPartners are each a "Party," and together the "Parties."

Objectives and Tasks

AlixPartners will provide advice to and assist the Committee in evaluating and implementing strategic and tactical options through the bankruptcy and restructuring process. A general list of tasks AlixPartners will likely perform is as follows:

- Review and evaluate the Company's current financial condition, business plans and cash and financial forecasts, and periodically report to the Committee regarding the same.
- Review the Company's cash management, tax sharing and intercompany accounting systems, practices and procedures.
- Evaluate any proposed sale process and related bids, and participate in any meetings with bidders or auction, as required.
- Review and investigate: (i) related party transactions, including those between the Company and non-debtor subsidiaries and affiliates (including, but not limited to, shared services expenses and tax allocations) and (ii) selected other prepetition transactions.
- Identify and/or review potential preference payments, fraudulent conveyances and other causes of action that the various Company estates may hold against third parties, including each other.
- Analyze the Company's assets and claims and assess potential recoveries to the various creditor constituencies under different scenarios.
- Provide valuation and litigation support services in connection with the preparation of valuation analyses and/or expert reports, as well as related expert testimony.
- Assist in the development and/or review of the Company's restructuring support agreement, plan of reorganization and disclosure statement.
- Review and evaluate court motions filed or to be filed by the Committee, the Company, or any other parties-in-interest, as appropriate.

AlixPartners, LLP| 909 Third Avenue, 30th Floor | New York, NY 10022 | 212.490.2500 | **alixpartners.com**

AlixPartners

- Render expert testimony and litigation support services, as requested from time to time by the Committee and its counsel, regarding any of the matters to which AlixPartners is providing services.

- Attend Committee meetings and Bankruptcy Court hearings as may be required in the role of advisors to the Committee.

- Support eDiscovery obligations including in conjunction with document requests, subpoenas, or other discovery requirements, such as forensic data acquisition and analysis, data processing, monthly secure data hosting, review and analysis, and productions, and any other eDiscovery needs requested by the Committee.

- Assist with such other matters as may be requested that fall within AlixPartners' expertise and are mutually agreeable.

Staffing

David MacGreevey will be responsible for the engagement, supported by the AlixPartners personnel necessary to complete the services provided under the Agreement. In addition, AlixPartners and its Affiliates have relationships with, and may periodically use, independent contractors with specialized skills and abilities to assist in this engagement.

We will periodically review the staffing levels to determine the proper mix for this assignment. We will only use the necessary staff required to complete the requested or planned tasks.

Timing and Fees

AlixPartners commenced this engagement on September 10, 2025 pending receipt of a copy of the executed Agreement.

The Company shall compensate AlixPartners for its services, and reimburse AlixPartners for expenses, as set forth on Schedule 1.

The Committee will promptly apply to the Bankruptcy Court to obtain approval of AlixPartners' retention nunc pro tunc to the date of the Agreement. AlixPartners acknowledges that its retention and the terms thereof are subject to Bankruptcy Court approval.

* * *

If these terms meet with your approval, please sign and return a copy of the Agreement.

Terms and Conditions

The Committee agrees to all the terms of the Agreement and to use its best efforts, through the application for retention of AlixPartners, to have the Company provide an indemnification to AlixPartners and its principals, employees, subcontractors, representatives, agents and counsel, as set forth in the Indemnification section of the General Terms and Conditions.

AlixPartners

We look forward to working with you.

Sincerely yours,

David MacGreevey
Partner & Managing Director

For and on behalf of AlixPartners, LLP

Agreement and acceptance confirmed

By: David Rowe

Its: Representative of Jupiter Asset Management in its capacity as Chair

Dated: October 8, 2025

For and on behalf of the Official Committee of Unsecured Creditors of ModivCare Inc.

AlixPartners

Schedule 1

Fees and Expenses

1. **Fees:** AlixPartners' fees will be based on the hours spent by AlixPartners personnel at AlixPartners' hourly rates, which are:

Partner / Partner & Managing Director	USD 1,225 – USD 1,540
Senior Vice President / Director	USD 850 – USD 1,150
Vice President	USD 650 – USD 835
Analyst / Consultant	USD 250 – USD 640

AlixPartners generally reviews and revises its billing rates semi-annually.

AlixPartners' total fees include any applicable eDiscovery fees (as set forth in the eDiscovery Related Matters Section of the General Terms and Conditions), retainer, break fee, or success fee payable hereunder (together, the "Fees").

2. **Expenses:** In addition to the Fees set forth in this Schedule, the Company shall pay directly, or reimburse AlixPartners upon receipt of periodic billings, for all reasonable out-of-pocket expenses incurred in connection with this engagement, such as travel, lodging and meals, and any technology costs associated with secure storage and handling of client data not otherwise covered by this Agreement.

3. **Retainer:** AlixPartners does not require a retainer in connection with this engagement.

4. **Payment:** AlixPartners will submit invoices in the manner required by the Bankruptcy Court, and all invoices will be due and payable immediately upon receipt, subject to Bankruptcy Court approval, as applicable.

AlixPartners

Data Protection Schedule
Description of Transfer

1. Categories of data subjects whose personal data is transferred

__x__ Employees / Members / Contractors of Data Controller

_____ Customers / Consumers / Clientele / Prospects of Data Controller

_____ Other:

2. Categories of personal data transferred

_____ Background Check Data (Criminal History, Drug Test Results, References, etc.)

_____ Biometric Data (Facial Recognition, Fingerprints, Voice Recording, etc.)

_____ Browsing Data (Cookies, Website History, IP Address, etc.)

__x__ Contact Information (Contact Details, Address, Email Address, Phone Numbers, etc.)

_____ Education and Skills (Academic Transcripts, Degrees, Languages, Training, etc.)

__x__ Employment Information (Compensation, Job Title, Personnel Number, Workers Comp, Office Location, etc.)

_____ Family Information (Children, Parents, etc.)

__x__ Financial Personal Information (Bank Accounts, Credit Card Numbers, etc.)

_____ Genetic Information (Genetic Sequence)

_____ Government Identifiers (National Identification Number, SSN, Driving License, etc.)

_____ Personal Identifiers (Name, Age, Date of Birth, Race, Video/Photo, Signature, etc.)

_____ Professional Experience & Affiliations (Trade Union Membership, Qualifications/Certifications, etc.)

_____ Social Media Data (Social Media Accounts, Social Media History, etc.)

_____ Travel and Expense (Travel History, Expense Details, etc.)

_____ User Account Information (Account Age, Account Number, Account Password, etc.)

_____ Workplace Welfare (Harassment Reports, Disciplinary Action, etc.)

_____ Other:

3. Frequency of data transfers

The frequency of the transfer will be continuous (multiple transfers).

4. Processing by AlixPartners

4.1. Nature of processing: The nature of processing will include receiving, storing, analyzing, transmitting to appropriate parties, and disposing of Personal Data.

4.2. Purpose of the data transfer and further processing: The purpose of processing is to provide the services described in the agreement above.

4.3. The period for which the personal data will be retained, or if the period is unknown, the criteria used to determine the period: AlixPartners will process Personal Data for the duration of the engagement.

4.4. Transfer to Sub-processors: Sub-processors may process Personal Data for the duration of the engagement life cycle and for the purposes specified above. See https://www.alixpartners.com/policies/subprocessors/ for a list of sub-processors.

AlixPartners, LLP
General Terms and Conditions

These General Terms and Conditions ("Terms") are incorporated into the Agreement to which these Terms are attached. In case of conflict between the wording in the letter and/or schedule(s) and these Terms, the wording of the letter and/or schedule(s) shall prevail.

Section 1. Committee Responsibilities

AlixPartners' performance of the services in accordance with the terms of the Agreement are dependent on the Committee's timely and effective completion of the following responsibilities to the extent they are reasonably necessary for such performance: (a) provide timely, reliable, accurate and detailed information, materials, documentation; and (b) make timely decisions, gain relevant approvals, and co-operate with AlixPartners as is necessary or desirable for the performance of the services.

Section 2. Nature of the Services of AlixPartners

AlixPartners is not an accounting firm or a law firm. AlixPartners is providing advisory and consulting services only and will not (i) unless expressly stated otherwise in the Agreement, make management decisions for the Committee, (ii) perform accounting audits, or (iii) provide legal services or advice. While AlixPartners may, from time-to-time, suggest options that may be available to the Committee, the ultimate decision as to such options rests with the Committee, and AlixPartners makes no promise or guarantee, nor gives any representations, about the outcome of the Committee's matters and/ or any decision it makes.

Section 3. Billing, Payments, and Taxes

Billing and Payments. All invoices for Fees and expenses are due as set forth on Schedule 1 (the "Due Date") via wire transfer to AlixPartners' bank account, as shown on the invoice. All amounts invoiced are based on services rendered and expenses incurred to date, and are not contingent upon future services or Work Product (as defined below), or the outcome of any case or matter.

There will be no administrative fees or costs charged to AlixPartners for the use of e-billing, procurement, factoring, or other similar services in connection with our invoicing (e.g. Ariba, SAP, Tymetrix, Brightflag, etc.) of this engagement. If the Company requests or requires AlixPartners to use the Company's or a third party's e-billing, procurement, factoring, or other similar services in connection with our invoicing and there are fees charged or discounts applied in connection with AlixPartners' use of such services, the Company agrees to reimburse AlixPartners for those fees or discounts as a reimbursable expense under the Agreement.

Taxes. AlixPartners' Fees are exclusive of taxes or similar charges, which shall be the responsibility of the Company (other than taxes imposed on AlixPartners' income generally). If AlixPartners' Fees are subject to any taxes, such as State sales tax or Value Added Tax, then AlixPartners will include such taxes on its invoices as separate line items.

Section 4. Use of Work Product

"Work Product" means all information, reports, materials, software and other work product that AlixPartners creates or develops specifically for the Committee in the performance and/or preparation of the services that constitutes, contains and/or comprises AlixPartners' advice, observations, assessments, evaluations, theories, formulas, methodologies, opinions, judgement, endorsements, recommendations and/ or proposals.

"Affiliate" means any entity that, directly or indirectly, controls, is controlled by or is under common control with the referenced entity, including the referenced entity's parent. In this definition, control means the power to direct the management and policies of an entity, directly or indirectly, whether through the ownership of voting securities, by contract or otherwise.

Except as disclosure may be required by law, regulation or regulatory process, or as allowed below, the Committee agrees that the Work Product shall only be used by the Committee internally solely for its own benefit and use consistent with the purpose of the services under the Agreement. The Committee acknowledges and agrees that AlixPartners' only duty of care in respect of the services and the Work Product is to the Committee.

The Committee may distribute the Work Product on a strictly confidential and non-reliance basis to its auditors, accountants, legal advisors, controlled and controlling Affiliates ("Authorized Recipients") provided that the Committee understands and agrees that AlixPartners does not accept any liability to any of the Authorized Recipients and AlixPartners sole duty of care is to the Committee. The Committee shall be responsible for any damages resulting from a breach of the terms of the Agreement by its Authorized Recipients.

Except as described above and without AlixPartners' prior written approval (not to be unreasonably withheld or delayed), no part of AlixPartners' Work Product may be (i) disseminated, reproduced, quoted, or referenced with attribution to AlixPartners or an unnamed consultant or (ii) disseminated to third parties without AlixPartners' prior written consent and such third parties executing AlixPartners' Report Access Letter.

Section 5. Confidentiality

Nondisclosure of Confidential Information. Each Party shall keep confidential all confidential information, in whatever form, relating to a Party or its finances, accounts, business, technologies, products, customers or suppliers obtained from the other Party during the performance of AlixPartners' services hereunder (the "Confidential Information"), and neither Party will disclose any Confidential Information to any other person or entity, except as permitted below. Confidential Information includes the terms of the Agreement.

Disclosure of Confidential Information. The foregoing is not intended to prohibit, nor shall it be construed as prohibiting, either Party from making such disclosures of Confidential Information that either Party reasonably believes are required by law or any regulatory requirement or authority, including AlixPartners' disclosures to clear client conflicts and as may be required by FedRBank P2014 in unrelated bankruptcy matters.

Either Party may disclose Confidential Information to its Affiliates, and its and their directors, officers, employees, partners, subcontractors, auditors, accountants, agents and legal advisors (collectively, "Representatives"), but

only if such Representatives reasonably need to know the Confidential Information as it relates to the services being provided under the Agreement and such Representatives are bound by similar confidentiality obligations. Each Party is responsible for any breach of these confidentiality obligations by any of its Representatives. AlixPartners may use Confidential Information (i) for benchmarking and related activities, and (ii) to train, enhance or test AlixPartners' Artificial Intelligence (AI) technologies to augment or enhance its services. Any such use will only be conducted behind a secure firewall, and any output from such activities will only be used on an aggregated and anonymized basis. In all such activities, AlixPartners shall strictly comply with the terms of this Agreement (including its confidentiality and privacy obligations), applicable laws, and our professional obligations.

Exclusions. The confidentiality provisions of the Agreement will not apply to any information that (a) is or becomes generally available to the public through no action by either Party or its Representatives (as defined below), (b) are or become available to either Party on a non-confidential basis from a source that such Party reasonably believes is lawfully permitted to so provide, or (c) is independently developed by either Party without the use of the Confidential Information of the other Party.

Return or Destruction of Information. At the conclusion of the Agreement, the receiving Party and its Representatives may, and will if so requested in writing by the disclosing Party, promptly return to the disclosing Party all tangible Confidential Information provided to the receiving Party and its Representative and will destroy/delete all summaries, notes, studies, compilations or written or electronic copies and records that reflect any of the Confidential Information prepared by either Party or any of its Representatives. Such destruction/deletion (or return/delivery) will be confirmed in writing. The foregoing obligation to return or destroy documents shall not extend to (i) documents the receiving Party is obligated to retain pursuant to any applicable law, rule, regulation, policy or by a competent authority, or (ii) any computer files or documents created as a result of automatic archiving and backup procedures provided that any such retained documents shall remain subject to the Agreement.

Expiration. The obligations of the Parties under this section shall survive the end of any engagement between the Parties for a period of three (3) years.

Marketing. AlixPartners will have the right to disclose to any person that it provided services to the Committee and a general description of such services, but AlixPartners shall not provide any other information about its involvement with the Committee.

Section 6. Intellectual Property

"Intellectual Property" means patents, registered designs, registered trademarks and applications and the right to apply for any of the foregoing, copyright, design rights, topography rights, database rights, brands, trademarks, utility model rights, rights in the nature of copyright, rights in inventions and all other industrial, commercial and intellectual property rights and all other rights or forms of protection having equivalent or similar effect to any of the foregoing arising anywhere in the world.

"AlixPartners Intellectual Property" means any Intellectual Property that AlixPartners has created, acquired or developed prior to the date of and/or separately from the Agreement and any enhancements, developments and/or improvements to any of the foregoing by and/or on behalf of AlixPartners during the course of, and/or in performance of, the Agreement.

"Committee Intellectual Property" means any Intellectual Property that AlixPartners creates specifically for the Committee in the performance of the services that is not AlixPartners Intellectual Property.

As between the Parties, the Committee's Intellectual Property shall be owned by the Committee upon full payment of all Fees and expenses due to AlixPartners and to that effect, subject to the payment of such Fees and expenses, AlixPartners hereby assigns its rights and interests in and the Committee's Intellectual Property to the Committee.

As between the Parties, the AlixPartners Intellectual Property shall be owned by AlixPartners and except to the extent explicitly agreed hereunder the Committee shall not acquire any title or interest in and to the AlixPartners Intellectual Property. AlixPartners hereby grants to the Committee a non-exclusive, non-transferable, irrevocable, royalty-free, worldwide license to use the AlixPartners Intellectual Property only to the extent necessary to enable the Committee to use and benefit from the results of the services, including the Committee's Intellectual Property, subject to and in accordance with the terms of the Agreement.

Section 7. Limitation of Liability

THE ALIXPARTNERS PARTIES SHALL NOT BE LIABLE TO THE COMMITTEE, THE COMMITTEE MEMBERS, THE COMPANY, OR ANY PARTY ASSERTING CLAIMS ON BEHALF OF THE COMPANY, EXCEPT FOR DIRECT DAMAGES FOUND IN A FINAL DETERMINATION TO BE THE DIRECT RESULT OF THE GROSS NEGLIGENCE, BAD FAITH, SELF-DEALING OR INTENTIONAL MISCONDUCT OF ALIXPARTNERS. THE ALIXPARTNERS PARTIES SHALL NOT BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES, LOST PROFITS, LOST DATA, REPUTATIONAL DAMAGES, PUNITIVE DAMAGES OR ANY OTHER SIMILAR DAMAGES UNDER ANY CIRCUMSTANCES, EVEN IF THEY HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. THE ALIXPARTNERS PARTIES' AGGREGATE LIABILITY, WHETHER IN TORT, CONTRACT, OR OTHERWISE, IS LIMITED TO THE AMOUNT OF FEES PAID TO ALIXPARTNERS FOR SERVICES UNDER THE AGREEMENT (OR IF THE CLAIM ARISES FROM AN ADDENDUM TO THE AGREEMENT, UNDER THE APPLICABLE ADDENDUM) (THE "LIABILITY CAP").

Nothing in the Agreement, including the Liability Cap, shall be deemed to limit or exclude AlixPartners' liability for (a) death or personal injury caused by negligence, (b) gross negligence, fraud or willful misconduct, or (c) to the extent such claim cannot by capped or limited by applicable law.

AlixPartners is not responsible for any third-party products or services separately procured by the Committee. The Committee's sole and exclusive rights and remedies with respect to any such third-party products or services are against the third-party vendor and not against AlixPartners, whether or not AlixPartners is instrumental in procuring such third-party product or service.

Section 8. Indemnification

The Committee agrees to use its best efforts, through the application for the retention of AlixPartners, to have the Company provide an indemnification to the AlixPartners Parties (as defined below), whereby:

The Company shall indemnify, hold harmless and defend AlixPartners and its Affiliates and its and their partners, directors, officers and employees (collectively, the "AlixPartners Parties") from and against all claims (including without limitation claims from Authorized Recipients), liabilities, losses, expenses and damages ("Loss") incurred or suffered arising out of or as a result of the performance by AlixPartners of the services or its obligations hereunder, or any third party's use of or reliance on the services provided under the Agreement or Work Product. The indemnity herein shall not apply to the extent such Loss directly arises as a result of AlixPartners' Parties gross negligence or willful misconduct. The Company shall pay Losses as incurred, including reasonable legal fees and disbursements of counsel. If, in the opinion of counsel, representing both Parties in the matter covered by this indemnification creates a potential conflict of interest, the AlixPartners Parties may engage separate counsel to represent them at the Company's expense.

The Company's indemnification obligations in this Section shall be primary to, and without allocation against, any similar indemnification obligations that AlixPartners may offer to its personnel generally.

Section 9. Governing Law and Arbitration

The Agreement is governed by and shall be construed in accordance with the laws of the State of New York with respect to contracts made and to be performed entirely therein and without regard to choice of law or principles thereof.

Any controversy or claim arising out of or relating to the Agreement, or the breach thereof, shall be settled by arbitration. Each Party shall appoint one non-neutral arbitrator. The two party arbitrators shall select a third arbitrator. If within 30 days after their appointment the two party arbitrators do not select a third arbitrator, the third arbitrator shall be selected by the American Arbitration Association (AAA). The arbitration shall be conducted in New York, New York under the AAA's Commercial Arbitration Rules, and the arbitrators shall issue a reasoned award. The arbitrators may award costs and attorneys' fees to the prevailing Party. Judgment on the award rendered by the arbitrators may be entered in any court having jurisdiction thereof.

Notwithstanding the foregoing, any Party may proceed directly to a court of competent jurisdiction to enforce the terms of the Agreement for any claim in connection with (i) the non-payment of Fees or expenses due under the Agreement, or (ii) the non-performance of obligations under the Indemnification section of these Terms. For the purposes of this paragraph, the Parties expressly consent to the jurisdiction of all Federal and state courts located in New York, New York.

In any court proceeding arising out of the Agreement, the Parties hereby waive any right to trial by jury.

Equitable Remedies. Each Party acknowledges and agrees that money damages alone may not be an adequate remedy for a breach of the Agreement. Each Party agrees that the non-breaching Party shall have the right to seek a restraining order and/or an injunction for any breach of the Agreement.

Section 10. Termination and Survival

The Agreement may be terminated at any time by ten days' written notice by one Party to the other; provided, however, that notwithstanding such termination AlixPartners will be entitled to any Fees and expenses incurred through the termination date (for fixed fee engagements, fees will be pro rata based on the amount of time completed). Such payment obligation shall inure to the benefit of any successor or assignee of AlixPartners.

Additionally, unless the Agreement is terminated by the Committee due to AlixPartners' material breach (and such material breach continues after 30 days' written notice thereof and opportunity to cure) AlixPartners shall remain entitled to the success fee(s), if any, that otherwise would be payable during the 12 months after the date of termination of the Agreement.

Sections 3, 4, 5, 7, 8, 10, 11, 12, 13, and 14 of these Terms, the provisions of Schedule 1 and the obligation to pay accrued fees and expenses shall survive the expiration or termination of the Agreement.

Section 11. General

Force Majeure. "Force Majeure Event" means any action, omission, act, event or circumstance which is beyond the reasonable control of AlixPartners and which prevents AlixPartners from performing any of its obligations under the Agreement, including failure to meet any standard of performance.

If a Force Majeure Event occurs, AlixPartners will, as soon as reasonably practicable, notify the Committee of its occurrence, nature and the anticipated impact it will have on AlixPartners' ability to perform its obligations under the Agreement and AlixPartners will have no liability in respect of the non-performance of such obligations during the continuation of the Force Majeure Event and for such time after its ends as is reasonably necessary for AlixPartners to recommence its affected performance under the Agreement.

Anti-Money Laundering Compliance. AlixPartners is obliged to and shall comply with certain regulations pertaining to its activities, including client take-on and the services contemplated during this engagement (for example UK, US and European anti- money laundering regulations as well as economic sanctions regulations administered by OFAC and/ or the Department of State in the US). The Committee acknowledges and agrees that AlixPartners will conduct customer due diligence checks at the outset of the business relationship and periodically thereafter, which may involve verifying the identity of the Committee members, the beneficial owners of the Committee, or their associated persons and entities, as well as other persons and entities with which AlixPartners is dealing in connection with this engagement. In that context, AlixPartners may request such information and documentation as is required for these purposes and

AlixPartners shall retain all information and documentation provided in accordance with applicable laws and its document retention policy, as amended from time to time.

Anti-Bribery and Corruption. The Parties shall comply with all applicable laws, statutes, regulations, and codes relating to anti-bribery and anti-corruption (including but not limited to the Bribery Act 2010). Each Party shall notify the other immediately if it has reason to suspect that any breach of the foregoing has occurred, is occurring or is likely to occur in connection with the Agreement, its subject matter or the receipt or payment (as the case may be) of any moneys from or by or on behalf of the Company.

If either Party (the "Defaulting Party") breaches this section, the other Party (the "Non-Defaulting Party") may, notwithstanding any other terms of the Agreement terminate the Agreement and may recover from the Defaulting Party any loss or damage suffered by the Non-Defaulting Party resulting from such termination.

The rights and remedies under this section entitled 'Anti-Bribery and Corruption' shall survive acceptance and payment of any moneys and be without prejudice to any other right or remedy available to the Non-Defaulting Party.

Severability. If any provision(s) of the Agreement are, in any jurisdiction, found to be invalid or unenforceable, that provision or parts thereof (as the case may be) will to that extent and in that jurisdiction be deemed not to form part of the Agreement and the enforceability of the remainder will not be affected in such jurisdiction.

Entire Agreement. The Agreement, including the letter, the Terms and the schedule(s), contains the entire understanding of the Parties relating to the services and supersedes any and all prior proposals, communications, agreements, understandings, representations, or estimates among the Parties with respect to such services. Each Party agrees that in entering into the Agreement other than as expressly included in the Agreement it does not rely on any statement, representation, undertaking, agreement or understanding of any nature made by any person. The Agreement, including the letter, the Terms and the schedule(s), may not be amended or modified in any respect except in a writing signed by the Parties.

Related Matters. Upon the Company's request or if an AlixPartners Party is required by applicable law, legal process or government action to produce information or testimony as a witness with respect to the Agreement, the Company shall reimburse AlixPartners for any professional time and expenses (including reasonable external and internal legal costs and e-discovery costs) incurred to respond to the request, except in cases where an AlixPartners Party is a party to the proceeding or the subject of the investigation.

Joint and Several Liability. If more than one counterparty enters into the Agreement with AlixPartners, the liability of each such counterparty shall be joint and several, and AlixPartners may take action against, or release or compromise the liability of, any counterparty, without affecting the liability of any other counterparty.

Third-Party Beneficiaries. Except where expressly stated to be for the benefit of Affiliates of AlixPartners (and such Affiliates will acquire rights to enforce the relevant terms), a person who is not a party to the Agreement has no rights to enforce any terms of the Agreement.

Notices. All notices required or permitted to be delivered under the Agreement shall be sent, if to AlixPartners, to:

AlixPartners, LLP
2000 Town Center, Suite 2400
Southfield, MI 48075
Attention: Chief Legal Officer

and if to the Committee, to its retained counsel, or to such other name or address as may be given in writing to AlixPartners. All notices under the Agreement shall be sufficient only if delivered by overnight mail. Any notice shall be deemed to be given only upon actual receipt.

Section 12. Bankruptcy Related Matters

The Committee shall promptly apply to the Bankruptcy Court for approval of the Committee's retention of AlixPartners under the terms of the Agreement. The form of retention application and proposed order shall be reasonably acceptable to AlixPartners. AlixPartners shall have no obligation to provide any further services unless AlixPartners' retention under the terms of the Agreement is approved by a final order of the Bankruptcy Court reasonably acceptable to AlixPartners. The Committee shall assist, or cause its counsel to assist, with filing, serving and noticing of papers related to AlixPartners' fee and expense matters.

The Committee and AlixPartners agree that the Bankruptcy Court shall have exclusive jurisdiction over any and all matters arising under or in connection with the Agreement.

AlixPartners will have the right to obtain independent legal counsel to obtain advice with respect to its services under the Agreement. The Company will reimburse AlixPartners for the reasonable fees and expenses of such independent legal counsel, following approval by the Bankruptcy Court.

AlixPartners acknowledges that, during the pendency of any Bankruptcy Court approved retention, the indemnification provisions and Liability Cap set forth above may be subject to modification as stated within the Bankruptcy Court's retention order.

If AlixPartners finds it desirable to augment its consulting staff with independent contractors (an "I/C") in this case, (i) AlixPartners will file, and require the I/C to file, 2014 affidavits indicating that the I/C has reviewed the list of the interested parties in this case, disclosing the I/C's relationships, if any, with the interested parties and indicating that the I/C is disinterested; (ii) the I/C must remain disinterested during the time that AlixPartners is involved in providing services on behalf of the Committee; and (iii) the I/C must represent that he/she will not work for the Committee or other parties in interest in this case during the time AlixPartners is involved in providing services to the Committee. AlixPartners' standard practice is to charge for an I/C's services at the rate equal to the compensation provided by AlixPartners to such I/C.

Section 13. eDiscovery Related Matters

eDiscovery Data Under Management. When eDiscovery services are utilized APS charges a $18/GB monthly fee for data (as described in the paragraph below) within AlixPartners eDiscovery environment ("eDiscovery Data Under Management"). EDiscovery Data Under

Management volume is calculated based on the size of the data in AlixPartners' eDiscovery secure environment, including all source data, databases, indices, and log files.

As used in this Section only, "data" shall mean such data and Confidential Information collected, transferred, and stored within AlixPartners' eDiscovery environment. The monthly fee for any eDiscovery Data Under Management does not apply to any other data or Confidential Information that is transferred and stored outside of AlixPartners' eDiscovery environment, or which relates to other services being provided under the Agreement.

Engagement Closure and Final Data Disposition. An engagement is deemed closed for data disposition purposes and no longer open (x) upon notice to AlixPartners by the Committee that AlixPartners' services will no longer be needed, or (y) AlixPartners may deem the engagement closed (1) after ninety (90) days of inactivity (no billed services or data fees), (2) no response by the Committee to attempted contact by AlixPartners, or (3) failure of the Company to pay AlixPartners Fees and expenses hereunder after 90 days' notice thereof. After closure of the engagement, AlixPartners will follow any reasonable written instructions from the Committee to return, destroy or permanently delete all data and Confidential Information related to the Agreement from within AlixPartners' processing, hosting, and archive systems. Absent such written instructions from the Committee, AlixPartners may, following engagement closure and at AlixPartners' sole discretion, return, destroy or permanently delete all data and Confidential Information related to the Agreement supplied to AlixPartners by the Committee within AlixPartners' processing, hosting and archive systems. Notwithstanding anything contained herein to the contrary, AlixPartners' obligation to return, delete or destroy data and Confidential Information shall not apply to (i) any computer records or files containing data and Confidential Information which have been created pursuant to automatic archiving or back-up procedures that cannot be reasonably deleted provided that such copies will be deleted or overwritten in the due course of such automatic procedures, and (ii) any data and Confidential Information that needs to be retained in accordance with applicable laws or in accordance with AlixPartners' record retention policy. Any data and Confidential Information retained under (i) or (ii) above will remain subject to AlixPartners' confidentiality obligation set forth in the Confidentiality Section of these Terms (other than any term for the confidentiality obligation, which will not apply until data or Confidential Information has been returned, destroyed, or deleted). Fees and expenses associated with return, deletion, destruction or other disposition of data and Confidential Information Confidential will be billed as set forth in Schedule 1 to the Agreement, or if not specified at AlixPartners' standard hourly rates for such services. If the Committee asks AlixPartners to archive any data or Confidential Information after the engagement is closed, the Company agrees to pay AlixPartners its standard monthly rate for such archival services. AlixPartners may request reasonable assurances from the Company of its intention to make such payments before performing the services.

Data Security and Transfer via Email. AlixPartners does not consider email or any other unencrypted method a sufficiently secured process for transferring data and Confidential Information to and from the Committee. AlixPartners uses specialized equipment and protocols to help protect the security of data and Confidential Information during collection, transport, transmission, and storage. Prior to commencement of this engagement, the Parties will establish approved methods for securely transferring electronic data and Confidential Information via physical media delivery and electronic file transfer services such as:

1. Delivery on an encrypted hard disk or other physical media using a complex password; or

2. Online transfer using a secure file transfer site approved for use by the Committee and AlixPartners. The Committee can either make such a site available for AlixPartners to download from, or AlixPartners can make such a site available for the Committee or any third party to upload data to.

At no time shall the Committee send data or Confidential Information to AlixPartners via email or any other unencrypted method. Should the Committee or any third party insist upon sending or receiving data or Confidential Information to or from AlixPartners via email (or any other unencrypted method), the Parties acknowledge and agree that (1) AlixPartners cannot guarantee the security, control, or permanent deletion of any such data and Confidential Information, and (2) AlixPartners shall have no liability, howsoever arising, to the Committee or to any third party for the disposition of any data or Confidential Information transferred to or from AlixPartners via email or other unencrypted method.

Section 14. Data Protection

To the extent applicable, the Committee and AlixPartners shall comply with the terms of the AlixPartners Data Protection Addendum (located at: https://www.alixpartners.com/data-protection-addendum/), which form part of the Agreement. The Data Protection Schedule of the Agreement shall apply to the Data Protection Addendum.

EXHIBIT C

MacGreevey Declaration

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)
Debtors. [1]	§	(Jointly Administered)

DECLARATION OF
DAVID MACGREEVEY IN SUPPORT
OF THE APPLICATION OF THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF ALIXPARTNERS,
LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025

I, David MacGreevey, make this declaration pursuant to 28 U.S.C. § 1746, and state:

1. I am a Partner and Managing Director of AlixPartners, LLP ("***AlixPartners***"),[2] which has a principal place of business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. I submit this declaration (the "***Declaration***") on behalf of AlixPartners in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* (the "***Application***") by which the Committee is seeking retention of AlixPartners on the terms and conditions set forth in the Application and the engagement letter

[1] A complete list of each of the Debtors in these 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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

between the Committee and AlixPartners attached to the Application as **Exhibit B** (the "***Engagement Letter***"). Except as otherwise noted, I have personal knowledge of the matters set forth herein.[3] If called and sworn as a witness, I could, and would, testify competently to the matters set forth herein.

3. On September 5, 2025, pursuant to Bankruptcy Code section 1102, the United States Trustee for the Southern District of Texas, Houston Division (the "***U.S. Trustee***") appointed the Committee, and on September 10, 2025, the Committee selected AlixPartners as its financial advisor with respect to these Chapter 11 Cases, subject to Court approval.

4. AlixPartners was requested to and began immediately to provide assistance to the Committee as of September 10, 2025.

AlixPartners' Qualifications

5. AlixPartners is an internationally recognized restructuring and turnaround firm with substantial experience in providing financial advisory services and has an excellent reputation for its work in large and complex chapter 11 cases on behalf of debtors and creditors throughout the United States. AlixPartners performs critical services that complement the services provided by the Committee's other professionals. AlixPartners is able to represent the Committee in a cost-effective, efficient and timely manner and has been performing such services since the Retention Date.

6. AlixPartners is well-qualified to serve as a financial advisor to the Committee. AlixPartners has assisted, advised, and provided strategic advice to debtors, creditors, bondholders, investors, and other entities in numerous chapter 11 cases of similar size and complexity to these Chapter 11 Cases. Its professionals have provided restructuring, financial

[3] Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at AlixPartners and are based on information provided by them.

advisory or crisis management services in numerous large cases, including recent filings in this district. *See, e.g., In re Ascend Performance Materials Holdings Inc.*, No. 25-90127 (CML) (Bankr. S.D. Tex. July 9, 2025); *In re Vertex Energy, Inc.*, No. 24-90507 (CML) (Bankr. S.D. Tex. Dec. 16, 2024); *In re Benefytt Techs., Inc.*, No. 23-90566 (CML) (Bankr. S.D. Tex. Aug. 3, 2023); *In re Altera Infrastructure L.P.*, No. 22-90129 (MI) (Bankr. S.D. Tex. Oct. 24, 2022); *In re GWG Holdings, Inc.*, No. 22-90032 (MI) (Bankr. S.D. Tex. Jul. 19, 2022); *In re Ion Geophysical Corp.*, No. 22-30987 (MI) (Bankr. S.D. Tex. Jun. 16, 2022); *In re CBL & Assocs. Props., Inc.*, No. 20-35226 (DRJ) (Bankr. S.D. Tex. Jan. 8, 2021); *In re Chesapeake Energy Corp.*, No. 20-33233 (CML) (Bankr. S.D. Tex. Sept. 21, 2020); *In re CARBO Ceramics Inc.*, No. 20-31973 (MI) (Bankr. S.D. Tex. June 30, 2020); *In re EP Energy Corp.*, No. 19-35654 (MI) (Bankr. S.D. Tex. Jan. 8, 2020).

7. I, David MacGreevey, the Partner and Managing Director who will be responsible for this engagement, have over 25 years of professional experience advising stakeholders on strategic transactions, including restructuring, M&A and capital raises. I lead AlixPartners' creditor services practice and have advised committees, management teams, boards of directors and investors on over 100 complex transactions across a variety of industries. I am a graduate of the University of Richmond and a Certified Insolvency and Restructuring Advisor.

Services to be Provided

8. It is presently anticipated that AlixPartners will continue to provide advice to and assist the Committee in evaluating and implementing strategic and tactical options through the bankruptcy and restructuring process.

9. A general list of tasks AlixPartners may perform is as follows:

- Review and evaluate the Debtors' current financial condition, business plans and cash and financial forecasts, and periodically report to the Committee regarding the same.

- Review the Debtors' cash management, tax sharing and intercompany accounting systems, practices and procedures.
- Evaluate any proposed sale process and related bids, and participate in any meetings with bidders or auction, as required.
- Review and investigate: (i) related party transactions, including those between the Debtors and non-debtor subsidiaries and affiliates (including, but not limited to, shared services expenses and tax allocations) and (ii) selected other prepetition transactions.
- Identify and/or review potential preference payments, fraudulent conveyances and other causes of action that the various Debtors' estates may hold against third parties, including each other.
- Analyze the Debtors' assets and claims and assess potential recoveries to the various creditor constituencies under different scenarios.
- Provide valuation and litigation support services in connection with the preparation of valuation analyses and/or expert reports, as well as related expert testimony.
- Assist in the development and/or review of the Debtors' restructuring support agreement, plan of reorganization and disclosure statement.
- Review and evaluate court motions filed or to be filed by the Committee, the Debtors, or any other parties-in-interest, as appropriate.
- Render expert testimony and litigation support services, as requested from time to time by the Committee and its counsel, regarding any of the matters to which AlixPartners is providing services.
- Attend Committee meetings and Bankruptcy Court hearings as may be required in the role of advisors to the Committee.
- Support eDiscovery obligations including in conjunction with document requests, subpoenas, or other discovery requirements, such as forensic data acquisition and analysis, data processing, monthly secure data hosting, review and analysis, and productions, and any other eDiscovery needs requested by the Committee.
- Assist with such other matters as may be requested that fall within AlixPartners' expertise and are mutually agreeable.

10. When necessary, the individuals working on this matter (the "***AlixPartners Personnel***") will be assisted by or replaced by various AlixPartners professionals at various levels.

No Duplication of Services

11. AlixPartners will work closely with White & Case LLP ("***White & Case***"), proposed counsel to the Committee, to ensure that there will be no duplication of efforts or unnecessary overlap in the services to be provided by AlixPartners and those that have been provided or which will be provided by the Committee's other professionals.

Fee and Expense Structure

12. AlixPartners' decision to accept this engagement to advise and assist the Committee is conditioned upon its ability to be retained in accordance with its customary terms and conditions of employment, compensated for its services, and reimbursed for the out-of-pocket expenses it incurs in accordance with its customary billing practices, as set forth in Schedule 1 of the Engagement Letter (the "***Fee and Expense Structure***").

13. AlixPartners' current standard hourly rates, subject to periodic adjustments, are as follows:

Title	Hourly Rate
Partner/ Partner & Managing Director	$1,225 – $1,540
Senior Vice President/ Director	$850 – $1,150
Vice President	$650 – $835
Analyst/ Consultant	$250 – $640

14. AlixPartners generally reviews and revises its billing rates semi-annually. Changes in applicable hourly rates will be noted on the invoices for the first time period in which the revised rates became effective.

15. To the extent the Committee requests services related to electronic discovery and data collection, certain fees will apply as further outlined by the Engagement Letter.

16. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

17. In addition to compensation for professional services rendered by AlixPartners Personnel, AlixPartners will seek reimbursement for reasonable and necessary expenses incurred in connection with these Chapter 11 Cases, including transportation costs, lodging, and meals.

18. AlixPartners intends to apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with these Chapter 11 Cases, subject to the Court's approval and in compliance with the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330* (Appendix A to 28 C.F.R. § 58) (collectively, the "***Fee Guidelines***"), applicable provisions of the Bankruptcy Code, including sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court, both in connection with this Application and the interim and final fee applications to be filed by AlixPartners in these Chapter 11 Cases.

19. AlixPartners will maintain records in support of any fees (in 1/10th of an hour increments), costs, and expenses incurred in connection with services rendered in these Chapter 11 Cases. Records will be arranged by category and nature of the services rendered and will include reasonably detailed descriptions of those services provided on behalf of the Committee. AlixPartners' applications for compensation of fees and reimbursement of expenses will be paid by the Debtors pursuant to the terms of the Engagement Letter and any procedures established by the Court, pursuant to an interim compensation order or otherwise.

20. AlixPartners does not seek a success fee in connection with these Chapter 11 Cases.

21. AlixPartners is not owed any amounts with respect to prepetition fees and expenses in connection with these Chapter 11 Cases.

22. Neither White & Case, the members of the Committee, nor any of their agents are or shall be responsible for the payment of AlixPartners' fees and costs arising out of the engagement described and referenced herein, regardless of whether or not AlixPartners is paid in full from the Debtors' estates.

Indemnification Provisions

23. The Engagement Letter contains standard indemnification language with respect to AlixPartners' services including, without limitation, an agreement by the Committee to cause the Debtors to indemnify AlixPartners and its affiliates, partners, directors, officers, employees and agents (each, an "***AlixPartners Party***" and collectively, the "***AlixPartners Parties***") from and against all claims, liabilities, losses, expenses and damages arising out of or in connection with the engagement of AlixPartners that is the subject of the Engagement Letter, except to the extent caused by gross negligence, willful misconduct, or fraud of any AlixPartners Party.

24. AlixPartners believes that the indemnification provisions contained in the Engagement Letter, as may be amended in the Proposed Order, are customary and reasonable for AlixPartners and comparable firms providing financial advisory services, and as would be modified pursuant to the foregoing limitations, reflect the qualifications and limitations on indemnification provisions that are customary in this district and others.

25. Moreover, the terms and conditions of the indemnification provisions were negotiated by AlixPartners at arm's length and in good faith. The provisions contained in the Engagement Letter, viewed in conjunction with the other terms of AlixPartners' proposed

retention, are reasonable and in the best interest of the Debtors, their estates, and all parties in interest.

AlixPartners' Disinterestedness

26. In connection with its proposed retention by the Committee in these Chapter 11 Cases, AlixPartners undertook a complex process, the details of which are set forth in **Schedule 2**, to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtors' estates. Specifically, AlixPartners obtained from the Committee's representatives a potential parties in interest list in these Chapter 11 Cases (each party a "***Party in Interest***", and collectively the "***Parties in Interest List***"). The Parties in Interest List is attached hereto as **Schedule 1.** A search was performed for connections to each Party in Interest as to AlixPartners Holdings, LLP, AlixPartners' parent company ("***Holdings***"), and each of Holdings' U.S. and non-U.S. subsidiaries ("***Holdings Enterprise***" and, collectively, "***AP***"). Results for connections to the Parties in Interest List are disclosed on **Schedule 2**.

27. Based on that review, AlixPartners represents that AlixPartners knows of no fact or situation that would represent a conflict of interest, cause it not to be disinterested or hold or represent an interest adverse to the Debtors' estates.

28. AlixPartners and its affiliates are advisors and crisis managers providing services and advice in many areas, including restructuring and distressed debt. As part of its diverse practice, AlixPartners appears in numerous cases, proceedings, and transactions involving many different law firms, accountants, investment bankers, and financial consultants, some of whom may represent claimants and parties in interest in these Chapter 11 Cases. Further, AlixPartners has in the past, and may in the future, be represented by various attorneys and law firms, some of whom may be involved in these Chapter 11 Cases. In addition, AlixPartners has been in the past,

and likely will be in the future, engaged in matters unrelated to the Debtors or these Chapter 11 Cases in which it works with or in opposition to other professionals involved in these Chapter 11 Cases. Moreover, AlixPartners might have referred work to other professionals retained in these Chapter 11 Cases. Likewise, professionals retained in these Chapter 11 Cases might have referred work to AlixPartners. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, none of these business relationships constitute interests adverse to the Debtors' estates.

29. From time to time, AlixPartners has provided services, and likely will continue to provide services, to certain creditors of the Debtors and various other parties adverse to the Debtors in matters wholly unrelated to these Chapter 11 Cases. As described herein, however, AlixPartners has undertaken a detailed search to determine, and to disclose, whether it is providing or has provided services to any significant creditor, equity security holder, insider, or other party in interest in such unrelated matters.

30. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, none of the AlixPartners Personnel (a) have any connection with the U.S. Trustee, or any employee in the Office of the U.S. Trustee; or (b) are related or connected to any United States Bankruptcy Judge for the Southern District of Texas, except as otherwise set forth on **Schedule 2**.

31. To the best of my knowledge, neither the AlixPartners Personnel nor AP is a direct holder of any of the Debtors' securities. It is possible that certain of AlixPartners' employees, managing directors, board members, equity holders, or an affiliate of any of the foregoing, may own interests in the Debtors, mutual funds or other investment vehicles (including various types of private funds) that own the Debtors' or other parties in interest's debt or equity securities or other financial instruments, including bank loans and other obligations. Typically, the holders of

indirect interests have no control over investment decisions related to such investment funds or financial instruments. Per the procedures set forth in **Schedule 1,** AlixPartners makes certain inquiries regarding direct interests and, to the extent required, will file a supplemental declaration reflecting additional details. AlixPartners' policy prohibits its employees from personally trading in the Debtors' securities.

32. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, AlixPartners has not been retained to assist any entity or person other than the Committee on matters relating to, or in direct connection with, these Chapter 11 Cases. AlixPartners will continue to provide professional services to entities that may be creditors or equity security holders of the Debtors or other parties in interest in these Chapter 11 Cases, provided that such services do not relate to, or have any direct connection with, these Chapter 11 Cases.

33. Certain of AlixPartners' employees, managing directors, board members, equity holders, or an affiliate of any of the foregoing may have financial accounts or insurance relationships with a potential party in interest.

34. Despite the efforts described above to identify and disclose the connections that AP and its affiliates have with parties in interest in these Chapter 11 Cases, because the Debtors form a large enterprise with numerous creditors and other relationships, AlixPartners is unable to state with certainty that every client relationship or other connection has been identified and disclosed.

35. In accordance with section 504 of the Bankruptcy Code and Bankruptcy Rule 2016, neither I nor AlixPartners has entered into any agreements, express or implied, with any other party in interest, including the Debtors, any creditor, or any attorney for such party in interest in these Chapter 11 Cases, (a) for the purpose of sharing or fixing fees or other compensation to be paid to any such party in interest or its attorneys for services rendered in connection therewith, (b) for

payment of such compensation from the assets of the estates in excess of the compensation allowed by the Court pursuant to the applicable provisions of the Bankruptcy Code, or (c) for payment of compensation in connection with these Chapter 11 Cases other than in accordance with the applicable provisions of the Bankruptcy Code.

36. Accordingly, except as otherwise set forth herein, insofar as I have been able to determine, neither I, AlixPartners, nor any of the AlixPartners Personnel holds or represents any interest adverse to the Debtors or their estates, and AlixPartners is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, in that AlixPartners and the AlixPartners Personnel:

(a) are not creditors, equity security holders, or insiders of the Debtors;

(b) were not, within two years before the Petition Date, a director, officer or employee of the Debtors; and

(c) do not have an interest materially adverse to the interest of the Debtors' estate or any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason.

37. If AlixPartners discovers additional information that requires disclosure, AlixPartners will promptly file a supplemental disclosure with the Court as required by Bankruptcy Rule 2014. AlixPartners reserves the right to supplement this Declaration in the event that AlixPartners discovers any facts bearing on matters described in this Declaration regarding AlixPartners' employment by the Committee.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ *David MacGreevey*
David MacGreevey
Partner & Managing Director

Date: October 8, 2025

SCHEDULE 1

Potential Parties in Interest

Potential Parties in Interest List[1]

DEBTORS

MODIVCARE INC. (F/K/A THE PROVIDENCE CORPORATION)
A & B HOMECARE SOLUTIONS, L.L.C
A.E. MEDICAL ALERT, INC.
ABC HOMECARE LLC
ALL METRO AIDS, INC.
ALL METRO ASSOCIATE PAYROLL SERVICES CORPORATION
ALL METRO CGA PAYROLL SERVICES CORPORATION
ALL METRO FIELD SERVICE WORKERS PAYROLL SERVICES CORPORATION
ALL METRO HEALTH CARE SERVICES, INC.
ALL METRO HOME CARE SERVICES OF FLORIDA, INC.
ALL METRO HOME CARE SERVICES OF NEW JERSEY, INC.
ALL METRO HOME CARE SERVICES OF NEW YORK, INC.
ALL METRO HOME CARE SERVICES, INC.
ALL METRO MANAGEMENT AND PAYROLL SERVICES CORPORATION
ALL METRO PAYROLL SERVICES CORPORATION
AM HOLDCO, INC.
AM INTERMEDIATE HOLDCO, INC.
ARSENS HOME CARE, INC.
ARU HOSPICE, INC.
ASSOCIATED HOME SERVICES, INC.
AT-HOME QUALITY CARE, LLC (F/K/A AT-HOME QUALITY CARE, INC.)
AUDITORY RESPONSE SYSTEMS, INC.
BARNEY'S MEDICAL ALERT-ERS, INC.
CALIFORNIA MEDTRANS NETWORK IPA LLC
CALIFORNIA MEDTRANS NETWORK MSO LLC
CARE FINDERS TOTAL CARE LLC
CAREGIVERS ALLIANCE, LLC
CAREGIVERS AMERICA HOME HEALTH SERVICES, LLC
CAREGIVERS AMERICA MEDICAL STAFFING, LLC
CAREGIVERS AMERICA MEDICAL SUPPLY, LLC
CAREGIVERS AMERICA REGISTRY, LLC
CAREGIVERS AMERICA, LLC.
CAREGIVERS ON CALL, INC.
CGA HOLDCO, INC.
CGA STAFFING SERVICES, LLC
CIRCULATION, INC.
FLORIDA MEDTRANS NETWORK LLC
FLORIDA MEDTRANS NETWORK MSO LLC
GUARDIAN MEDICAL MONITORING, LLC
HEALTH TRANS, INC.
HEALTHCOM, INC.
HEALTHCOM HOLDINGS LLC
HELPING HAND HOME HEALTH CARE AGENCY INC
HELPING HAND HOSPICE INC.
HIGI CARE HOLDINGS, LLC
HIGI CARE, LLC
HIGI SH HOLDINGS INC.
HIGI SH LLC
INDEPENDENCE HEALTHCARE CORPORATION
METROPOLITAN MEDICAL TRANSPORTATION IPA, LLC
MLA SALES, LLC
MODIVCARE SOLUTIONS, LLC
MULTICULTURAL HOME CARE INC.
NATIONAL MEDTRANS, LLC
NEW ENGLAND EMERGENCY RESPONSE SYSTEMS, INC.
OEP AM, INC.
PANHANDLE SUPPORT SERVICES, INC.
PERSONAL IN-HOME SERVICES, INC.
PHILADELPHIA HOME CARE AGENCY, INC.
PROVADO TECHNOLOGIES, LLC
RED TOP TRANSPORTATION, INC.
RIDE PLUS, LLC
SAFE LIVING TECHNOLOGIES, LLC
SECURA HOME HEALTH HOLDINGS, INC. (F/K/A HEARTS AY HOME HOLDINGS, INC.)
SECURA HOME HEALTH, LLC (F/K/A HEARTS AT HOME, LLC)
SOCRATES HEALTH HOLDINGS, LLC
TRIMED, LLC
UNION HOME CARE LLC

[1] This list (and the categories contained herein) are for purposes of a conflicts check only and should not be relied upon by any party as a list of creditors or for any other purpose. Latham has attempted to remove duplicate entries where possible. Accordingly, a party that otherwise would fall under multiple categories is likely to be listed under only one category. Additionally, certain of the Debtors' debt obligations or equity interests may be held by more than one affiliated entity within the same financial institution. Where the affiliation of such entities is obvious based on their names, only one entity is included herein.

VALUED RELATIONSHIPS, INC.
VICTORY HEALTH HOLDINGS, LLC
VRI INTERMEDIATE HOLDINGS, LLC

NON-DEBTOR AFFILIATES

PROMETHEUS HOLDCO, LLC
ARUBU, INC.
HIGI SH CANADA ULC
INGEUS INVESTMENTS LIMITED
INGEUS, LLC
MERCURY PARENT, LLC
MODIVCARE LABS PRIVATE LIMITED
NEMT INSURANCE DE LLC, SERIES 1
MEDTRANS NETWORK IPA, LLC

DEBTORS' PREVIOUS NAMES, PREDECESSORS, AND RELATED ENTITIES

MODIVCARE INC. (F/K/A THE PROVIDENCE CORPORATION)
AT-HOME QUALITY CARE, LLC (F/K/A AT-HOME QUALITY CARE, INC.)
SECURA HOME HEALTH HOLDINGS, INC. (F/K/A HEARTS AY HOME HOLDINGS, INC.)
SECURA HOME HEALTH, LLC (F/K/A HEARTS AT HOME, LLC)

DEBTORS' RESTRUCTURING AND OTHER SIGNIFICANT PROFESSIONALS

FTI CONSULTING, INC.
HUNTON ANDREWS KURTH LLP
LATHAM & WATKINS LLP
MOELIS & COMPANY
KURTZMAN CARSON CONSULTANTS, LLC (D/B/A VERITA GLOBAL)
QUINN EMMANUEL URQUHART & SULLIVAN LLP

DEBTORS' ORDINARY COURSE PROFESSIONALS

ANYBILL
BRADLEY ARANT BOULT CUMMINGS LLP
CAPITAL IMPACT GROUP LLC
ERNST & YOUNG US LLP
GIBSON, DUNN & CRUTCHER LLP
KELLEY CONSULTING
KPMG LLP
LITTLER MENDELSON PC
M J SIMON & COMPANY LLC
NIXON PEABODY LLP
POLSINELLI PC
PRICEWATERHOUSE COOPERS LLP
RODEFER MOSS & CO PLLC
STATE EMPLOYEES' CREDIT UNION
STEVENS & LEE P.C.
WILLCOX SAVAGE CONSULTING LLC
WILLOUGHBY HUMPHREY & D'ANTONI PA

PROFESSIONALS FOR OTHER MAJOR STAKEHOLDERS

PAUL HASTINGS LLP
CHILMARK PARTNERS, LLC
LAZARD FRERES & CO. LLC

MAJOR EQUITY HOLDERS[2]

AI CATALYST FUND, LP
ARISTOTLE CAPITAL BOSTON, LLC
COLISEUM CAPITAL MANAGEMENT, LLC
D.E. SHAW & CO
SCEPTER HOLDINGS, INC.
SSGA ACTIVE TRUST

[2] For purposes of this list, major equity holders are considered to be persons or entities who held in excess of 1% of the Debtors' equity securities as of the Petition Date.

THE VANGUARD GROUP, INC.
BARROW, HANLEY, MEWHINNEY & STRAUSS LLC

CURRENT AND FORMER OFFICERS AND DIRECTORS (UP TO 3 YEARS)

ANNE BAILEY
BARBARA GUTIERREZ
CAROLYN MCCARTHY
CHELSEY BERSTLER
CHRIS ECHOLS
CHRIS HEINE
CHRIS SHACKELTON
CRAIG BARBAROSH
DAMON GREEN
DAVID COULTER
FAISAL KHAN
FRANCIS JACKSON WRIGHT
GARTH GRAHAM
ILIAS SIMPSON
JAMES WATSON
JARON ROSS
JEFF BENNETT
JENNIFER JASKOLKA
JODY KEPLER
JONATHAN BUSH
L. HEATH SAMPSON
LESLIE V. NORWALK
MIA HANEY
NEAL GOLDMAN
RAHUL DIGAMBER SAMANT
RICHARD A. KERLEY
SHANE RAGLAND
TODD CARTER
ALEC CUNNINGHAM
DAVID MOUNTS GONZALES
ERIN RUSSELL
DANIEL. B SILVERS

TRUSTEES, AGENTS, SECURED LENDERS (INCLUDING CERTAIN BOND HOLDERS), AND OTHER POTENTIAL LIENHOLDERS

ALLIANCEBERNSTEIN HOLDING LP
ALLSPRINGS GLOBAL INVESTMENTS
ANKURA TRUST COMPANY, LLC
BANK OF AMERICA, N.A.
BARCLAYS BANK PLC
BEACH POINT CAPITAL MANAGEMENT
BIRCH GROVE CAPITAL
BNP PARIBAS S.A.
BRIGADE CAPITAL MANAGEENT
CHILMARK PARTNERS, LLC
CIBC BANK USA
COMERICA BANK
D.E. SHAW & CO
DEUTSCHE BANK AG NEW YORK BRANCH
ENSIGN PEAK ADVISORS
FIAM LLC AN AFFILIATE OF FIDELITY INVESTMENTS
HALSEYPOINT ASSET MANAGEMENT, LLC
HEWLETT-PACKARD FINANCIAL SERVICES COMPANY
HG VORA CAPITAL MANAGEMENT
HSBC BANK PLC
JEFFERIES FINANCE LLC
JP MORGAN CHASE BANK, N.A.
JUPITER ASSET MANAGEMENT
KEYBANK, NATIONAL ASSOCIATION
MADISON AVENUE INTERNATIONAL LP
METROPOLITAN WEST ASSET MANAGEMENT
NEUBERGER BERMAN GROUP
POLAR ASSET MANAGEMENT PARTNERS INC.
PRIVATEBANK AND TRUST COMPANY
Q5-R5 TRADING, LTD.
REDWOOD CAPITAL MANAGEMENT
REGIONS BANK
ROARING FORK TRADING
SILVER ROCK FINANCIAL LP
SILVER ROCK MANAGEMENT LLC
SUMMIT HOUSE CAPITAL MANAGEMENT, LLC
SUMITOMO MITSUI BANKING CORPORATION
TCW ASSET MANAGEMENT COMPANY
TCW GROUP
TEXAS EXCHANGE BANK
TRUIST BANK
U.S. BANK EQUIPMENT FIANANCE
WELLS FARGO BANK, N.A.
WILMINGTON TRUST
WSFE BANK

OTHER NOTEHOLDERS

JUPITER FUND MANAGEMENT
BLACKROCK

STATE STREET
OLIVE STREET INVESTMENT ADVISERS
GRACE PARTNERS OF DUPAGE
CANADIAN IMPERIAL BANK
AMERIPRISE FINANCIAL
POLEN CAPITAL MANAGEMENT

TOP 30 UNSECURED CREDITORS

1800MEDIVAN INC
ACTIVE SC ONE INC
AM PM MEDICAL TRANSPORTATION COMPANY INC
AMAZON WEB SERVICES, INC.
BASIN INNOVATION GROUP LLC
BERHANU ALAZE
BEST NEIGHBOR TRANSPORTATION LLC
BROADRIDGE ICS
CDW DIRECT
CHEIIS TRANSPORT LLC
ELITE HOME CARE LLC
EMPLOYEES PROVIDENT FUND ORGANISATION
GALAXY AMBULANCE LLC
HOMECARE SOFTWARE SOLUTIONS LLC
HOSPITAL TO HOME LLC
HUMANA, INC.
IBEX GLOBAL FZ-LLC
KDK TRANSPORT COMPANY
LIFE TECH INC
LYFT HEALTHCARE INC
METRO ONE AMBULANCE INC.
MORRIS AND COMPANY
ORION CONSULTING
PNP GROUP LLC
RANDSTAD NORTH AMERICA LP
REYNO CAR SERVICE INC
RIDE SOURCE INC
SHELTERPOINT LIFE INSURANCE CO
SKORI INC
SOFTSERVE INC.
SUNSHINE STATE HEALTH PLAN INC.
TRICARE AT INSPIRA LLC
UBER HEALTH LLC
UNITED HEALTHCARE SERVICES INC
WILMINGTON SAVINGS FUND SOCIETY, FSB
WSFS BANK

MAJOR SUPPLIERS AND VENDORS

3 OMR LLC
AB EXPRESS TRANSPORT LLC
ACADIAN AMBULANCE SERVICE OF NEW ORLEANS
ADVANCED MEDICAL TRANSPORT CORP
AIRPORT EXPRESS INC
AIRPORT TAXI INC
ACE USA
ALCHEMY TECHNOLOGY GROUP LLC
ALL AIRPORT TAXI INC
ALLMED TRANSPORTATION INC
ALPHA MEDICAL TRANSPORTATION INC
AMERICAN EXPRESS
AMERICAN GROUND TRANSPORTATION
AMERICAN MEDICAL RESPONSE WEST
ARISE VIRTUAL SOLUTIONS INC
ASSIST MEDICAL SERVICE INC
ASTRA CARE LLC
BIG DOG CITY CORPORATION
BIG ISLAND LIMOUSINE INC
C & H COMPANY
CALIFORNIA ACCESS INC
CITY OF SACRAMENTO FIRE DEPARTMENT
CLX MEDICAL TRANSPORT INC
COMPASSION CARE SENIOR SERVICES
COMPLETE MEDICAL TRANSPORT CORP
DEPENDACARE TRANSPORTATION LLC
DURICARE INC
EASTWESTPROTO INC
ELITE CARE AMBULANCE INC
ETA TRANS INC
EXPRESS TRANSPORTATION AGENCY
FASTCARE MEDICAL TRANSPORTATION LLC
FREEUS, LLC
GALAXY AMBULANCE LLC
GOLD STAR EMS LLC
GOLDEN STATE MANAGEMENT GROUP INC
GOOD VIBES MEDICAL TRANSPORTATION LLC
GOODWILL TRANSPORTATION SERVICES LLC
HULIN TRANSPORTATION, INC
IBEX GLOBAL SOLUTIONS
INDEPENDENT CAB
INTEGRITY MEDICAL TRANSPORTATION CORP
INTEGRITY MEDICAL TRANSPORTATION CORP
JOHNSON MEDICAL TRANSPORT LLC
JUDI'S CARRIER SERVICE INC
KIBOIS COMMUNITY ACTION FOUNDATION, INC
KWPH ENTERPRISES
L& L TRANSPORTATION LLC
LALIBELA TRANSPORTATION LLC
LUCY TRANSPORTATION INC
LYFT INC.
M & M GROUP INC
MARE TRANSPORTATION INC
MARVEL MEDICAL TRANSPORT LLC
MEDEX TRANSPORTATION INC

MEDICAL TRANSPORT SOLUTIONS INC
MEDICAL XPRESS NON EMERGENCY TRANSPORT
MEDLINK MEDICAL TRANSPORT INC
METRO ONE AMBULANCE INC
MONTES DE OCA CORP DBA MK UNLIMITED
NEW JERSEY TRANSIT CORP
ON TIME AMBULANCE INC
P & I TRANSPORTATION INC
PATTERSON TRANSPORTATION SERVICE LLC
PAUL D RONALD
PONY CARE TRANSPORTATION INC.
PRO TRANSPORT-1, LLC
PROCARE MEDICAL TRANSPORTATION CORP
PULSE MEDICAL TRANSPORTATION
QUICK PICK TRANSPORTATION INC.
RECVUE INC
RESOURCE MANAGEMENT SYSTEMS INC
RICHMOND CITY TAXI CAB INC
RIDE PLUS LLC
ROMED INC
ROYAL CAB INC
ROYAL MEDICAL TRANSPORTATION LLC
ROYAL TRANSPORTATION LLC
SACRAMENTO METROPOLITAN FIRE DISTRICT
SAFETY 1ST PARATRANSIT INC
SAHRAWI INC
SALESFORCE.COM INC
SHIRETOWN SOLUTIONS LLC
SHUTTLE RUIDOSO LLC
SKORI INC
SKY TRANSPORTATION LLC
SOUTHEAST TRANSPORTATION SERVICES LLC
SUNSHINE MEDICAL TRANSPORT LLC
TEDLA TRANSPORTATION
TEPLIS TRAVEL SERVICE
TEXAS MEDICAL TRANSPORTATION
TOP GUN TRANSIT LLC
TRANSPORT SOLUTIONS
TRANSPORT4ELDERS LLC
TRICARE MEDICAL TRANSPORTATION
VA TRANSPORT LLC
VALLEY MEDICAL TRANSPORT LLC
VXI GLOBAL SOLUTIONS LLC
WORKBOARD INC
WORKDAY INC
YELLOW CAB MEDICAL TRANSPORT LLC

MAJOR CUSTOMERS

ALAMEDA ALLIANCE FOR HEALTH
ARKANSAS DEPARTMENT OF HUMAN SERVICES OFFICE OF PROCUREMENT
BLUE CROSS OF CALIFORNIA
BROADRIDGE ICS
COMMONWEALTH OF VIRGINA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES
COMMONWELTH OF PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES
COMMONWELTH OF VIRGINA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES
COVENTRY HEALTH CARE OF VIRGINIA
HEALTH CARE SERVICE CORPORATION
HEALTH NET OF CALIFORNIA, INC.
HEALTHFIRST HEALTH PLAN, INC.
HUMANA MEDICAL PLAN
OKLAHOMA HEALTH CARE AUTHORITY
ORANGE COUNTY HEALTH AUTHORITY
SENTARA HEALTH ADMINISTRATION
SOUTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES
STATE OF DELAWARE, DEPARTMENT OF HEALTH AND SOCIAL SERVICES
THE GEORGIA DEPARTMENT OF COMMUNITY HEALTH
THE STATE OF MAINE, DEPARTMENT OF HEALTH AND HUMAN SERVICES
THE STATE OF NEW JERSEY, DIVISON OF MEDICAL ASSISTANCE AND HEALTH SERVICES
THE WEST VIRGINIA BUREAU FOR MEDICAL SERVICES
UNITED HEALTH CARE INSURANCE COMPANY

DEBTORS' BANKS

WELLS FARGO BANK, N.A.
WEBSTER BANK, N.A.
PNC BANK, N.A.
IMPERIAL BANK OF CANADA
CITIZENS BANK, N.A.
BANC OF CALIFORNIA, INC.
HSBC HOLDINGS PLC.
VANTAGE BANK TEXAS
TRUIST FINANCIAL CORPORATION
MORGAN STANLEY
U.S. BANCORP

INSURANCE PARTIES

ACE AMERICAN INSURANCE COMPANY (CHUBB)
ACE FIRE UNDERWRITERS INSURANCE COMPANY (CHUBB)
ALLIANZ GLOBAL RISKS US INSURANCE COMPANY
ALLIANT INSURANCE SERVICES, INC.
ARCH INSURANCE COMPANY
ARCH SPECIALTY INSURANCE COMPANY
BERKELEY SPECIALTY INSURANCE
BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY
BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY
COBBS ALLEN CAPITAL HOLDINGS, LLC
CONTINENTAL CASUALTY COMPANY (CNA)
ENDURANCE AMERICAN INSURANCE COMPANY
ENDURANCE AMERICAN INSURANCE COMPANY (SOMPO)
ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY
ESIS, INC.
FAIR AMERICAN INSURANCE AND REINSURANCE COMPANY (ATRI)
FAIRMATIC (SIRIUSPOINT SPECIALTY INSURANCE COMPANY)
FEDERAL INSURANCE COMPANY (CHUBB)
FIREMAN'S FUND INSURANCE COMPANY (ALLIANZ)
FIREMAN'S FUND INSURANCE COMPANY
GREAT AMERICAN INSURANCE COMPANY
ILLINOIS UNION INSURANCE COMPANY (CHUBB)
INDEMNITY INSURANCE COMPANY OF NORTH AMERICA (CHUBB)
LANDMARK AMERICAN INSURANCE COMPANY
LANDMARK AMERICAN INSURANCE COMPANY (R-T SPECIALTY)
LIBERTY SURPLUS INSURANCE CORPORATION
MERCER INSURANCE COMPANY (R-T SPECIALTY)
MSIG SPECIALTY INSURANCE USA (PROPRAXIS)
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA. (AIG)
RSUI INDEMNITY COMPANY (R-T SPECIALTY)
SCOTTSDALE INSURANCE COMPANY (PROPRAXIS)
SIRIUSPOINT LTD.
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA
WESTFIELD SELECT INSURANCE COMPANY
W. R. BERKLEY CORPORATION
XL SPECIALTY INSURANCE COMPANY
XL SPECIALTY INSURANCE COMPANY

SURETY BOND ISSUERS & BENEFICIARIES

AMERIGROUP PARTNERSHIP PLAN, LLC
ATLANTIC SPECIALTY INSURANCE COMPANY
BLUE CROSS OF CALIFORNIA DBA ANTHEM BLUE CROSS
COMMONWEALTH OF VIRGINIA
DELAWARE FIRST HEALTH, INC
ELEVANCE HEALTH, INC.
FEDERAL INSURANCE COMPANY
MAGNOLIA HEALTH PLAN, INC.
OKLAHOMA COMPLETE HEALTH, INC. C/O CENTENE CORPORATION
PENNSYLVANIA PUBLIC UTILITY COMMISSION
SIRIUSPOINT AMERICA INSURANCE COMPANY
STATE OF ALABAMA
STATE OF CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION
STATE OF FLORIDA, AGENCY FOR HEALTH CARE ADMINISTRATION
STATE OF INDIANA, FAMILY AND SOCIAL SERVICES ADMINISTRATION, OFFICE OF MEDICAID POLICY AND PLANNING
STATE OF MAINE DEPARTMENT OF TRANSPORTATION
STATE OF NEW JERSEY
STATE OF SOUTH CAROLINA, DEPT. OF HEALTH AND HUMAN SERVICES
TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA
VIRGINIA DEPARTMENT OF MOTOR VEHICLES
WELLCARE AFFILIATES
WESTCHESTER FIRE INSURANCE COMPANY

LANDLORDS

1 AVENUE C BUILDING MADISON
111 WASHINGTON STREET REALTY LLC
1590 ADAMSON LLC
174 JEFFERSON, LLC
18 SHEPARD STREET LLC
1978 THIRD AVENUE LLC
22 WEST MAIN LLC
26 JOURNAL SQUARE OWNER LLC
30 PECK ROAD LLC
307-319 W LANDIS LLC
330 SCANGAS NOMINEE TRUST
39 CROSS 79 PROSPECT REALTY TRUST
400 SOUTHBOROUGH LLC
446A BLAKE LLC C/O TOM GELMAN
6900 LAYTON SUBSIDIARY, LLC
70 EAST SUNRISE HWY LLC
7055 BRANDY HILL PLAZA ASSOCIATES LLC
75 BROAD LLC
8 PENN CENTER OWNER LP
800 BRIDGECAM LLC
8818 EXPEDITION LLC
ALBANY TOWERS LLC
AVANTI HOLDINGS LLC
BALANCE HOLDINGS, LLC
BANTA MANAGEMENT LLC
BLOOMFIELD BK, LLC
BLS ASSET MANAGEMENT CORP
BOIC PROPERTIES LLC
BRIDGE33 REAL ESTATE PARTNERS LP
BUFFINGTON PROPERTY MANAGEMENT LLC
BYRON KOTZAS & OLGA DOMOTOR ETAL PT
CGP DEVELOPMENT CO INC
CIPHER REALTY
CITATION INVESTMENTS INC
CITY OF NORTON
COLIN DUNCAN
COLONIAL CENTRE SQUARE LLC
DAVIS PROFESSIONAL PARK LLC
DEBRA SAYLES
DF ACQUISITIONS LLC
DIAMOND PROPERTY MANAGEMENT, LLC
EDGEWATER CORPORATE PARK LLC
ELM GROVE REALTY, LLC
ENGHOUSE INTERACTIVE INC
EWING EQUITIES, LLC
FORTUNATO REALTY INC
GARVEY PROPERTIES
GPI-CAL REALTY I LP
HANOVER PLAZA ASSOCIATES
HM SKY HARBOR, LLC
HURON GROUP INC
JMDJMS LIMITED LIABILITY COMPANY
KAGR2 BINGHAMTON LLC
KOAM INVESTORS GROUP, LLC
KELLAR INDUSTRIES, LLC
LAPP LIMITED PARTNERSHIP
LEE, WEST & WALSH, LP
LEGERE PROPERTIES LLC
MARK J. OTERI
MARQUEZ-ENT, LLC
MAYNARD ROAD CORP
MCCORMACK FAMILY LIMITED PARTNERSHIP
MELLIN LIMITED PARTNERSHIP
METROPLEX ASSOCIATES 1
METROPLEX ASSOCIATES 2
MIAMI LAKES CENTER LLC
MJH WACKER LLC
NICOLAS HERRERA
NORTHPARK OFFICE LLC
PALISADE PLAZA WEST LLC
PALM BEACH BUSINESS CENTER PARTNERSHIP
PAVILION UNIT ACQUISITION LP
PEAK REALTY ENTERPRISES LLC
PREMIUM ASSET MANAGEMENT, INC.
PRIMECO TOWERS INDIA
Q2U2 LLC
REGUS
RNSI CITY PLACE JV LLC
ROBERT & PATRICIA AIKEN
ROBERT L ECKLIN
ROBERT L. ALBERTSON, JR.
ROC II FAIRLEAD GRAN PARK AVENUES LLC
S&N LAWRENCE REALTY LLC
S&R LLC
SEAMLESS CENTENNIAL LTD
SEMYA I LLC
SHELBOURNE LAFAYETTE LLC
SHRESTHA P MANAGEMENT LLC
SIKYU ENTERPRISES LLC
SL TOWN CENTER REALTY, LLC
SPIEGEL & SPIEGEL PA MONEY PURCHASES PENSION PLAN AND 401 K PROFIT SHARING PLAN
SUMMIT INVESTMENTS PROPERTIES LLC
TANIOS REALTY LLC
THE WE COMPANY MANAGEMENT HOLDINGS L.P.
THOMAS A BECKER
THORNE PROPERTIES
TN BROTHER LLC
TSK MORRIS LLC
TSO ICP LP
UNIVERSITY AVENUE LLC
USA EQUITY TRUST LLC

WATER STREET REALTY TRUST
WEWORK
WEBBS PROPERTY LLC
WICK SHOPPING PLAZA ASSOCIATES LLC
WILLOWOOD PARK LLC
WOODSIDE SPECIAL OPPORTUNITY PE FUND LP

UTILITIES

11:11 SYSTEMS, INC.
3N DOCUMENT DESTRUCTION INC
4 ELOHIM CLEANING INC.
A&E LOW VOLTAGE SOLUTIONS LLC
8X8 INC
A1 DATASHRED
A&E LOW VOLTAGE SOLUTIONS LLC
ABINGTON TOWNSHIP POLICE DEPARTMENT
ACCURATE FIRE EQUIPMENT CORP
ADT US HOLDINGS INC
AFFORDABLE PEST CONTROL, INC.
AFFORDABLE SHRED AND STORAGE
ALLIED FIRE & SAFETY EQUIPMENT CO, INC.
AMERICAN ELECTRIC POWER
AT&T
AT&T MOBILITY
ATMOS ENERGY CORPORATION
BANDWIDTH INC.
BLOOM SERVICES LLC
BOARDMAN FIRE EXTINGUISHER CO INC
BOROUGH OF CLARKS SUMMIT
BOSTON FIRE EXTINGUISHER CO INC
BRISCOE PROTECTIVE LLC
BUEHLER MOVING AND STORAGE CO
CHARTER COMMUNICATIONS
CINTAS CORPORATION NO. 2
CITY OF PERTH AMBOY
CITY OF SULLIVAN (CIVIC CENTER)
CITY OF TEMPE POLICE DEPARTMENT
CITY OF VINELAND - FIRE
CLEARFIELD MUNICIPAL AUTHORITY
COGENT COMMUNICATIONS, LLC
COLOGIX
COLONIAL RECORD STORAGE
COMCAST
COMMONWEALTH EDISON COMPANY
CON EDISON CO OF NEW YORK
CORNING NATURAL GAS CORP
COX COMMUNICATIONS ARIZONA, LLC
DATA STRUCTION
DIALPAD INC.
EARTHWORKS LANDSCAPE & DESIGN INC
ELIZABETHTOWN GAS COMPANY
EMERGENT POWER SOLUTIONS LLC
ENTERGY UTILITY HOLDING COMPANY, LLC
FIRE PROTECTION PRODUCTS
FIRE PROTECTION SERVICE CORPORATION
FIRSTENERGY CORP
FLORIDA POWER AND LIGHT
FRANKLIN TOWNSHIP SUPERVISORS
FRONTIER COMMUNICATIONS
G&G PROPERTY MAINTENANCE
GROUNDSYSTEMS, INC
IMWOTH LLC
INFOSHRED LLC
INTERNATIONAL TELCOM, LLC
IRIS GROUP HOLDINGS LLC
IRON MOUNTAIN
IRON MOUNTAIN INCORPORATED
JEMPS MANAGEMENT
JOHN'S REFUSE & RECYCLING, LLC
LEVEL 3 COMMUNICATIONS LLC
LONG ISLAND LIGHTING CO
LOWITT ALARMS SECURITY SYSTEM
LS REMOLENG LLC
MARMIC FIRE AND SAFTEY CO INC
MASERGY COMMUNICATIONS, INC.
MONONGAHELA POWER CO
MOUNTAINEER GAS COMPANY
NATIONAL GRID
NEPTUNE FIRE DISTRICT #1
NEW JERSEY-AMERICAN WATER COMPANY
NIAGARA MOHAWK POWER CORPORATION
NJR HOME SERVICES COMPANY
NORTH CENTRAL SIGHT SERVICES INC
NYSEG
ON SITE CONFIDENTIAL SHREDDING JJMR LLC
PACKETFABRIC INC
PALISADE PLAZA WEST LLC
PECO ENERGY COMPANY
PENNSYLVANIA AMERICAN WATER COMPANY
PENNSYLVANIA ELECTRIC COMPANY
PJSJ ENTERPRISES INC
PPL ELECTRIC UTILITIES CORPORATION
PSE&G CO
REPUBLIC SERVICES, INC.
ROCHESTER GAS AND ELECTRIC CORP
ROMAN SENTRY SECURITY SYSTEMS, INC.
RUMPKE OF OHIO, INC.
SAFT LTD
SANGOMA US INC.
SECURITAS TECHNOLOGY CORPORATION
SECURITY RESOURCES INC
SERVICE LOGIC STRATEGIC SERVICES, LLC
SOME LIKE IT GREEN LLC
SOUTH JERSEY GAS

STERICYCLE INC
SUMMIT FIRE & SECURITY LLC
TEXAS GAS SERVICE
THE ADT SECURITY CORPORATION (INACTIVE)
THE CONNECTICUT LIGHT AND POWER CO
THE SHREDDING SOURCE
THE SOUTHERN CONNECTICUT GAS COMPANY
THE UNITED ILLUMINATING COMPANY
T-MOBILE USA INC
TITANIUM SECURITY & SURVEILLANCE LLC
TOWN OF NORTH ATTLEBOROUGH
TOWNSHIP OF PARSIPPANY
UGI UTILITIES INC
VEOLIA WATER NEW JERSEY INC
VERIZON COMMUNICATIONS INC.
VINELAND MUNICIPAL UTILITES
VITAL RECORDS HOLDINGS LLC
WHITE PALMS FIRE REQUIPMENT INC
WIGGINS SHREDDING, INC
WINDSTREAM
WM CORPORATE SERVICES, INC.
YALL RITE LLC DBA GREENLEAF RECYCLING

UNITED STATES BANKRUPTCY JUDGES FOR THE SOUTHERN DISTRICT OF TEXAS (AND KEY STAFF MEMBERS)

AARON JACKSON
AKEITA HOUSE
ANA CASTRO
JEANNIE CHAVEZ
JUDGE ALFREDO R. PEREZ
JUDGE CHRISTOPHER M. LOPEZ
JUDGE EDUARDO V. RODRIGUEZ
JUDGE JEFFREY P. NORMAN
JUDGE MARVIN ISGUR
ROSARIO SALDANA
SHANNON HOLDEN
SIERRA THOMAS-ANDERSON
TRACY CONRAD
TYLER LAWS
YESENIA LILA
NATHAN OCHSNER

UNITED STATES TRUSTEE FOR THE SOUTHERN DISTRICT OF TEXAS (AND KEY STAFF MEMBERS)

ALETHEA CALUZA
ALICIA BARCOMB
ALINA SAMKO-YU
ANDREW JIMENEZ
CHRISTOPHER R. TRAVIS
CHRISTY SIMMONS
GLENN OTTO
GWEN SMITH
HA NGUYEN
HECTOR DURAN
IVETTE GERHARD
JANA WHITWORTH
JAYSON B. RUFF
KEVIN M. EPSTEIN
LINDA MOTTON
MILLIE APONTE SALL
RAJALAKSHMI KRISHNAN
SAMANTHA CHILTON
SUSAN B. HERSH
VIANEY GARZA
YASMINE RIVERA

EMPLOYEE INSURANCE PROGRAM ADMINISTRATORS

AMERICAN SPECIALTY HEALTH INCORPORATED
AUTOMATIC DATA PROCESSING, INC.
BIND BENEFITS, INC. D/B/A SUREST
CBIZ, INC.
COMPSYCH EMPLOYEE ASSISTANCE PROGRAMS, INC.
ESIS, INC.
HEALTHSMART HOLDINGS INC.
IMAGINE HEALTH, INC.
METLIFE, INC.
OPTUM BANK, INC.
OPTUMRX, INC.
PARTNERS DIRECT HEALTH LLC
THE CIGNA GROUP
TRUDATARX, INC.
UNITEDHEALTH GROUP
VERACITY BENEFITS, LLC
VOYA FINANCIAL, INC.
WELLFLEET INSURANCE COMPANY
WEX INC.

COMPETITORS

ACCESSCARE
ALIVI HEALTH
CALL THE CALL
MEDIDRIVE
MTM, INC.
RIDE2MD

ADVERSE PARTIES IN LITIGATION, ADMINISTRATIVE PROCEEDINGS, AND OTHER LEGAL OR REGULATORY MATTERS

LAW OFFICES OF DAVID M. GASPARI, P.A.[3]
PENNSYLVANIA HUMAN RELATIONS COMMISSION
ADRIENNE REED
ALEXA MORALES
ALEXIS JONES
AMERICAN GROUND TRANSPORTATION
ANDREA HINSON DEANGELO DAVIS
ANGEL PEREZ
ARTHUR OWENS
ASANTA S. BUXTON
BRANDY CURTIS
BRENT JOHNSON
BRITTNEE HARRIS
CAMECISE METELLUS
CARLA WILLIAMS
CHEREDA IVORY
CHRISTOPHER SMITH
CLEMMIE WILLIAMS
COOLYN TURNER
CYNTHIA BREECE
DALE FITZ
DANNY EVANS
DARYL STOKES
DAVID PULSIFER
DAVID T. PATTERSON
DEBBIE MARIE HOWARD
DEBRA BURDEN
DEBRA CHABERT
DEBRA JONES
DENISE AVALOS
DENZELL CARSWELL
DEXTER SIAS
DIANA CLAUDIO
DIANNA GUINYARD
DINESH KALERA
DOMINICK VITI
DONNA MAE TOTTY
DOUGLAS SELBY
EASTER LYONS
EDWIN BARROSO-PEREZ
ELAINE BOWDOIN
ELIZABETH HERNANDEZ HERRERA
ELLEN PILLEY
ELLEN REYES
FATIMA ZHINDON
FRANCES DOUGLAS
GABRIELLA ARCENA DE LOS SANTOS
GERALDINE NIXON FORD
GERALDINE ORR
GWENDOLYN MOBLEY
HEATHER SWICK
HELEN D. WALKER
HOPE SADLER
IDA WILLIAMS
INSTANT TRANSPORTATION LLC
JACQUELINE SISTRUNK
JAMES A. BATES
JAMES OLIVER STEPHENS
JAMES PEREZ
JAYESON HENRY
JEFFREY HARRIS
JESSIE LOVE
JHOVANNA PARKER
JIMMY SMITH
JORGE FURCOY
KAREN WALTERS
KENYATTA GODWIN
LEA'CIMMONE BRIGGS
LEWIS HAGAR
LEWIS S. GLASS
LINDA GANT
MAE ROBERTSON
MARIA J. CAMACHO PINEDA
MARIANN SCHROEDER
MARQUIS HINES
MARTHE PAUL
MARTIN LUQUE
MARYANN ORTEGA
MICHAEL MAVROVITIS
MODEST KELTRICK
MOIRA SANDROCK

[3] Law firm names appear where an adverse plaintiff's name has been anonymized in court filings.

NHI NGU
NICHOLAS GARZA
NILSA TORRES
NORMAN FISHBEIN
ORLANDO CLARK
QADRIYYAH HILL
RACHEL CORBETT
RAPHAEL CRAWFORD
READING METRO, LLC
ROBERT KLEBETZ
ROBERT L. FREIDMAN
ROBERT SMITH
ROBERTA GWIN
RODRICK HACKWORTH
RONALD HINES
RONNIE HUNT
RUTH OLIVER
RYAN MARTIN
SADIE DONNELL
SADIE DONNELL CHRISTOPHER SMITH
SALLY TRIANO
SANDRA PADILLA HERNANDEZ
SANTA GUERRERO
SEINI IKA
SENIORCARE EMERGENCY MEDICAL SERVICES, INC.
SHABANA HAFIZ
SHAUNTALAY MCCLENDON
SHAWN MEADOWS
SHOOSHANIK CHARKHCHIAN
SONYA ROSS
STACIE ROGERS
SUFUNDA SAMUEL
SUZANNE BETTS
SUZIE PLUMAJ
TERENCE WHITE
TERRENCE CORA
THERESA HENRY
THERESA LYONS
TINA HAGER
TRINIDAD DE LA CRUZ
VEDA ROBERSON
VINCENT STALEY
WILLARD MCCLAM
WILLIE CROMARTIE
ZANE WHITFIELD

GOVERNMENT AUTHORITIES AND TAX COLLECTORS

ABINGTON MUNICIPAL TAX COLLECTOR
ABINGTON TOWNSHIP TAX OFFICE
ALABAMA DEPARTMENT OF REVENUE
ALBEMARLE COUNTY TAX COLLECTOR
ALEXANDRIA FINANCE DEPARTMENT
ALIEF ISD TAX OFFICE
AMERICAN FINANCIAL CREDIT SERVICES, INC.
AMESBURY MUNICIPAL TAX COLLECTOR
ANSONIA CITY TAX COLLECTOR
ARIZONA DEPARTMENT OF REVENUE
ARKANSAS DEPARTMENT OF FINANCE AND ADMINISTRATION
ARKANSAS DEPT. OF FINANCE AND ADMINISTRATION
ASOTIN COUNTY TAX COLLECTOR
ATTLEBORO MUNICIPAL TAX COLLECTOR
BEAUFORT COUNTY TREASURER
BELL COUNTY
BENTON COUNTY TAX COLLECTOR
BERKHEIMER TAX ADMINISTRATOR
BERKS COUNTY TAX COLLECTION COMMITTEE
BERLIN MUNICIPAL TAX COLLECTOR
BERNALILLO COUNTY TAX COLLECTOR
BEXAR COUNTY TAX ASSESSOR-COLLECTOR
BOSSIER PARISH SHERIFF
BOSTON ASSESSING DEPARTMENT
BOURNE MUNICIPAL TAX COLLECTOR
BRAINTREE MUNICIPAL TAX COLLECTOR
BRANFORD TOWN TAX COLLECTOR
BRAZORIA COUNTY TAX OFFICE
BRAZOS COUNTY TAX OFFICE
BRIDGEPORT CITY TAX COLLECTOR
BRISTOL CITY TAX COLLECTOR
BROCKTON MUNICIPAL TAX COLLECTOR
BROOKFIELD TOWN TAX COLLECTOR
BRUNSWICK COUNTY TAX COLLECTOR
BURLINGTON MUNICIPAL TAX COLLECTOR
BURNET COUNTY TAX ASSESSOR-COLLECTOR
CALIFORNIA DEPARTMENT OF TAX AND FEE ADMINISTRATION (CDTFA)
CALIFORNIA FRANCHISE TAX BOARD
CAMERON COUNTY TAX ASSESSOR-COLLECTOR
CANTON TOWN TAX COLLECTOR
CHELAN COUNTY TAX COLLECTOR
CHESAPEAKE CITY TAX COLLECTOR
CHESHIRE TOWN TAX COLLECTOR
CHESTERFIELD COUNTY TAX COLLECTOR
CITY OF HOLYOKE TAX COLLECTOR
CITY OF MCALLEN
CITY OF NORTH HAVEN TAX COLLECTOR
CITY OF SAVANNAH, GEORGIA
CITY OF WORCESTER TAX COLLECTOR
CLALLAM COUNTY TAX COLLECTOR
CLARK COUNTY TREASURER'S OFFICE

CLINTON TOWN TAX COLLECTOR
COLCHESTER TOWN TAX COLLECTOR
COLLIN COUNTY TAX ASSESSOR-COLLECTOR
COLONIAL HEIGHTS CITY TAX COLLECTOR
COLORADO DEPARTMENT OF REVENUE
COMAL COUNTY TAX ASSESSOR-COLLECTOR
COMPTROLLER OF MARYLAND, REVENUE ADMINISTRATION DIVISION
CONNECTICUT DEPARTMENT OF REVENUE SERVICES
CONTRA COSTA COUNTY TAX COLLECTOR
COWLITZ COUNTY TAX COLLECTOR
CROMWELL TOWN TAX COLLECTOR
CULPEPER TOWN TAX COLLECTOR
CYPRESS-FAIRBANKS ISD TAX ASSESSOR-COLLECTOR
D.C. OFFICE OF TAX AND REVENUE
DALLAS COUNTY TAX ASSESSOR-COLLECTOR
DANBURY CITY TAX COLLECTOR
DANVILLE CITY TAX COLLECTOR
DARTMOUTH MUNICIPAL TAX COLLECTOR
DELAWARE DEPARTMENT OF FINANCE
DELAWARE DIVISION OF CORPORATIONS
DELAWARE DIVISION OF CORPORATIONS (DEPT OF REVENUE)
DENTON COUNTY TAX ASSESSOR-COLLECTOR
DENVER TREASURY DIVISION
DESOTO COUNTY TAX COLLECTOR
DISTRICT OF COLUMBIA OFFICE OF TAX AND REVENUE
DONA ANA COUNTY TAX COLLECTOR
DOUGLAS COUNTY TAX COMMISSIONER
EAST HAMPTON TOWN TAX COLLECTOR
EAST HAVEN TOWN TAX COLLECTOR
EAST LYME TOWN TAX COLLECTOR
ECTOR COUNTY TAX ASSESSOR-COLLECTOR
EL PASO COUNTY TAX ASSESSOR-COLLECTOR
ELLIS COUNTY TAX OFFICE
ERATH COUNTY TAX ASSESSOR-COLLECTOR
FAIRFIELD TOWN TAX COLLECTOR
FAIRHAVEN MUNICIPAL TAX COLLECTOR
FIRST COLONY L.I.D
FLORENCE COUNTY TREASURER'S OFFICE
FLORIDA DEPARTMENT OF REVENUE
FLUVANNA COUNTY TAX COLLECTOR
FORREST COUNTY TAX COLLECTOR
FRAMINGHAM MUNICIPAL TAX COLLECTOR
FRANKLIN COUNTY TAX COLLECTOR
FREDERICK COUNTY TAX COLLECTOR
FREDERICKSBURG CITY TAX COLLECTOR
FREETOWN MUNICIPAL TAX COLLECTOR
GALVESTON COUNTY TAX OFFICE
GEORGETOWN COUNTY TREASURER
GEORGIA DEPARTMENT OF REVENUE
GLASTONBURY TOWN TAX COLLECTOR
GLOUCESTER COUNTY TAX COLLECTOR
GRANBY TOWN TAX COLLECTOR
GRANT COUNTY TREASURER'S OFFICE
GRAYS HARBOR COUNTY TAX COLLECTOR
GROTON TOWN TAX COLLECTOR
HAMPTON CITY TAX COLLECTOR
HANOVER COUNTY TREASURER
HARRIS COUNTY TAX ASSESSOR-COLLECTOR
HARRISON COUNTY TAX COLLECTOR
HARTFORD CITY TAX COLLECTOR
HARWICH MUNICIPAL TAX COLLECTOR
HAWAII DEPARTMENT OF TAXATION
HAYS COUNTY TAX ASSESSOR-COLLECTOR
HENRICO COUNTY TAX COLLECTOR
HIDALGO COUNTY TAX ASSESSOR-COLLECTOR
HINDS COUNTY TAX COLLECTOR
HOLYOKE MUNICIPAL TAX COLLECTOR
HOPEWELL CITY TAX COLLECTOR
HUMBLE ISD TAX OFFICE
IDAHO STATE TAX COMMISSION
ILLINOIS DEPARTMENT OF REVENUE
INDIANA DEPARTMENT OF REVENUE
IOWA DEPARTMENT OF REVENUE
ISLAND COUNTY TAX COLLECTOR
ISLE OF WIGHT COUNTY TAX COLLECTOR
JAMES CITY COUNTY TAX COLLECTOR
JEFFERSON COUNTY TAX ASSESSOR-COLLECTOR
JOHNSTON COUNTY TAX OFFICE
JOHNSTON COUNTY TREASURER
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
KANSAS DEPARTMENT OF REVENUE
KENTUCKY DEPARTMENT OF REVENUE
KING COUNTY TAX COLLECTOR
KITSAP COUNTY TAX COLLECTOR
LACLEDE COUNTY TAX COLLECTOR
LAMAR COUNTY TAX COLLECTOR
LAREDO ISD TAX OFFICE
LAUDERDALE COUNTY TAX COLLECTOR
LEE COUNTY TAX COLLECTOR
LEFLORE COUNTY ASSESSOR
LOS ANGELES COUNTY TAX COLLECTOR
LOUDOUN COUNTY TAX COLLECTOR
LOUISIANA DEPARTMENT OF REVENUE
LUBBOCK COUNTY TAX ASSESSOR-COLLECTOR
LYNCHBURG CITY TAX COLLECTOR
MADISON TOWN TAX COLLECTOR
MAINE REVENUE SERVICES

MANATEE COUNTY TAX COLLECTOR
MANCHESTER TOWN TAX COLLECTOR
MARICOPA COUNTY TREASURER
MARIN COUNTY TAX COLLECTOR
MARYLAND COMPTROLLER OF THE TREASURY
MARYLAND DEPT OF ASSESSMENTS & TAXATION
MASON COUNTY TREASURER
MASSACHUSETTS DEPARTMENT OF REVENUE
MERIDEN CITY TAX COLLECTOR
MICHIGAN DEPARTMENT OF TREASURY
MIDDLETOWN CITY TAX COLLECTOR
MILFORD CITY TAX COLLECTOR
MILFORD MUNICIPAL TAX COLLECTOR
MINNESOTA DEPARTMENT OF REVENUE
MISSISSIPPI DEPARTMENT OF REVENUE
MISSOURI DEPARTMENT OF REVENUE
MODIOHEALTH, INC.
MONROE TOWN TAX COLLECTOR
MONTANA DEPARTMENT OF REVENUE
MONTGOMERY COUNTY TAX ASSESSOR-COLLECTOR
NAUGATUCK CITY TAX COLLECTOR
NEBRASKA DEPARTMENT OF REVENUE
NEW BRITAIN CITY TAX COLLECTOR
NEW FAIRFIELD TOWN TAX COLLECTOR
NEW HAMPSHIRE DEPARTMENT OF REVENUE ADMINISTRATION
NEW HAVEN CITY TAX COLLECTOR
NEW JERSEY DEPARTMENT OF THE TREASURY
NEW JERSEY DIVISION OF TAXATION
NEW MEXICO DEPARTMENT OF TRANSPORTATION
NEW MEXICO PUBLIC REGULATION COMMISSION
NEW MEXICO TAXATION AND REVENUE DEPARTMENT
NEW MILFORD TOWN TAX COLLECTOR
NEW YORK CITY DEPARTMENT OF FINANCE
NEW YORK STATE DEPARTMENT OF TAXATION AND FINANCE
NEWINGTON TOWN TAX COLLECTOR
NEWPORT NEWS CITY TAX COLLECTOR
NEWTON MUNICIPAL TAX COLLECTOR
NEWTOWN TOWN TAX COLLECTOR
NORFOLK CITY TAX COLLECTOR
NORTH ADAMS MUNICIPAL TAX COLLECTOR
NORTH ANDOVER MUNICIPAL TAX COLLECTOR
NORTH BRANFORD TOWN TAX COLLECTOR
NORTH CAROLINA DEPARTMENT OF REVENUE
NORTH HAVEN TOWN TAX COLLECTOR
NORTHBOROUGH MUNICIPAL TAX COLLECTOR
NORTON CITY TAX COLLECTOR
NORWALK CITY TAX COLLECTOR
NORWICH CITY TAX COLLECTOR
NUECES COUNTY TAX ASSESSOR-COLLECTOR
OAK PARK CITY TREASURER (OAKLAND)
OFFICE OF LONG-TERM LIVING
OHIO DEPARTMENT OF TAXATION
OKANOGAN COUNTY TAX COLLECTOR
OKLAHOMA TAX COMMISSION
OLD SAYBROOK TOWN TAX COLLECTOR
ONSLOW COUNTY TAX COLLECTOR
ORANGE COUNTY TAX COLLECTOR
ORANGE TOWN TAX COLLECTOR
OREGON DEPARTMENT OF REVENUE
ORLEANS MUNICIPAL TAX COLLECTOR
PARKER COUNTY APPRAISAL DISTRICT
PENNSYLVANIA DEPARTMENT OF REVENUE
PETERSBURG, VIRGINIA, COMMISSIONER OF THE REVENUE
PIERCE COUNTY TAX COLLECTOR
PIMA COUNTY TREASURER
PITTSFIELD MUNICIPAL TAX COLLECTOR
POQUOSON CITY TAX COLLECTOR
PORTSMOUTH CITY TAX COLLECTOR
POTTER COUNTY TAX ASSESSOR-COLLECTOR
POTTSVILLE CITY HALL
PUTNAM TOWN TAX COLLECTOR
RANKIN COUNTY TAX COLLECTOR
REEVES COUNTY APPRAISAL DISTRICT
RHODE ISLAND DIVISION OF TAXATION
RICHMOND CITY TAX COLLECTOR
RIDGEFIELD TOWN TAX COLLECTOR
ROANOKE CITY TAX COLLECTOR
ROCKY HILL TOWN TAX COLLECTOR
RUTHERFORD COUNTY TAX COLLECTOR
SAN DIEGO COUNTY TAX COLLECTOR
SAN MATEO COUNTY TAX COLLECTOR
SANDWICH MUNICIPAL TAX COLLECTOR
SAULT SAINTE MARIE CITY TREASURER (CHIPPEWA)
SEYMOUR TOWN TAX COLLECTOR
SHELBY COUNTY OCCUPATIONAL LICENSE FEE OFFICE
SHELTON CITY TAX COLLECTOR
SIMSBURY TOWN TAX COLLECTOR
SOLANO COUNTY TREASURY
SOUTH CAROLINA
SOUTH CAROLINA DEPARTMENT OF REVENUE
SOUTHBURY TOWN TAX COLLECTOR
SOUTHINGTON TOWN TAX COLLECTOR
SPOKANE COUNTY TAX COLLECTOR

SPOTSYLVANIA COUNTY TAX COLLECTOR
SPRING ISD TAX OFFICE
SPRINGFIELD CITY TAX COLLECTOR
STAFFORD COUNTY TAX COLLECTOR
STAMFORD CITY TAX COLLECTOR
STANISLAUS COUNTY TREASURER-TAX COLLECTOR
STRATFORD TOWN TAX COLLECTOR
SWAMPSCOTT MUNICIPAL TAX COLLECTOR
TARRANT COUNTY TAX ASSESSOR-COLLECTOR
TAYLOR COUNTY TAX COLLECTOR
TENNESSEE DEPARTMENT OF REVENUE
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
TEXAS CONTROLLER OF PUBLIC ACCOUNTS
TEXAS DEPARTMENT OF LICENSING AND REGULATION
THE AGENCY FOR HEALTH CARE ADMINISTRATION
THURSTON COUNTY TAX COLLECTOR
TOM GREEN COUNTY APPRAISAL DISTRICT
TOMBALL ISD TAX OFFICE
TORRINGTON CITY TAX COLLECTOR
TOWN OF BRATTLEBORO
TOWNSHIP OF NEPTUNE NEW JERSEY
TRAVIS COUNTY TAX ASSESSOR-COLLECTOR
TREASURER-STATE OF NEW JERSEY
TRUMBULL TOWN TAX COLLECTOR
U.S. DEPARTMENT OF THE TREASURY
UTAH STATE TAX COMMISSION
VERMONT DEPARTMENT OF TAXES
VERNON TOWN TAX COLLECTOR
VIRGINIA DEPARTMENT OF TAXATION
WALLA WALLA COUNTY TAX COLLECTOR
WALLINGFORD TOWN TAX COLLECTOR
WARREN COUNTY TAX COLLECTOR
WASHINGTON DEPARTMENT OF REVENUE
WATER VALLEY CITY TAX COLLECTOR
WATERBURY CITY TAX COLLECTOR
WATERFORD TOWN TAX COLLECTOR
WATERTOWN TOWN TAX COLLECTOR
WEBB COUNTY TAX ASSESSOR-COLLECTOR
WEST HAVEN CITY TAX COLLECTOR
WEST VIRGINIA STATE TAX DEPARTMENT
WESTPORT TOWN TAX COLLECTOR
WETHERSFIELD TOWN TAX COLLECTOR
WHATCOM COUNTY TAX COLLECTOR
WICHITA COUNTY TAX ASSESSOR-COLLECTOR
WILLIAMSON COUNTY TRUSTEE'S OFFICE
WILSON COUNTY TRUSTEE
WILTON TOWN TAX COLLECTOR
WINCHESTER TOWN TAX COLLECTOR
WINDHAM TOWN TAX COLLECTOR
WINDSOR TOWN TAX COLLECTOR
WINTERVILLE CITY TAX COLLECTOR
WISCONSIN DEPARTMENT OF REVENUE
WOBURN MUNICIPAL TAX COLLECTOR
WOLCOTT TOWN TAX COLLECTOR
YAKIMA COUNTY TAX COLLECTOR
YALOBUSHA COUNTY TAX COLLECTOR
YORK COUNTY TAX COLLECTOR

SCHEDULE 2

AlixPartners' Disinterestedness

- In connection with the proposed employment and retention of AlixPartners, LLP ("***AlixPartners***") by the Committee in this these Chapter 11 Cases, AlixPartners undertook a complex process, the details of which are set forth below, to determine whether it had any conflicts or other relationships that might cause it not to be disinterested or to hold or represent an interest adverse to the Debtors' estates.

  AlixPartners Holdings, LLP, AlixPartners' parent company ("***Holdings***"), directly or indirectly owns Holdings' U.S. and non-U.S. subsidiaries (collectively, the "***Holdings Enterprise***"). The equity capital of Holdings is owned by the following investors:

  (i) Lakeview Capital Holdings, Inc., the Jay Alix Living Trust and other trusts established by Jay Alix (collectively the "***Lakeview Parties***");
  (ii) Caisse de dépôt et placement du Québec ("***CDPQ***");
  (iii) Investcorp Holdings B.S.C. ("***IVC***");
  (iv) Public Sector Pension Investment Board ("***PSP***"); and
  (v) Current Partners and Managing Directors and certain former Managing Directors of AP (as defined below) and their individual and family trusts, as well as certain other individuals, including current members of the Boards (as hereinafter defined) and employees of the Lakeview Parties, and their individual and family trusts.

  (Collectively, (i) – (v) above are hereinafter referred to as the "***Investors***", and the subset (ii) – (iv) above are hereinafter referred to as the "***Institutional Investors***").

  Holdings and AlixPartners, each have a board of directors (together, the "***Boards***"). No individual or entity controls either of the Boards. Designees of each of the Investors (i) – (iv) above serve as members of the Boards. The Holdings Enterprise does not invest in distressed assets of any class, nor does it have any investment affiliates.

  CDPQ is one of Canada's largest institutional investment managers. It manages investments on behalf of most of Quebec Canada's public and parapublic pension and insurance funds. CDPQ invests globally in numerous industries.

  IVC is a leading global provider and manager of alternative investment products.

  PSP is one of Canada's largest pension investment managers. It invests funds for the pension plans of the Public Service, the Canadian Armed Forces, the Royal Canadian Mounted Police and the Reserve Force. PSP manages a diversified global portfolio in numerous industries throughout the world.

  The Lakeview Parties and related entities are entities owned or controlled by Jay Alix that, among other things, make investments on behalf of Mr. Alix and his family.

  In addition to their investments in Holdings, the Institutional Investors have substantial investments unrelated to AlixPartners.

The Boards are not involved in the delivery of client services and their members do not have access to client files, except for a minority of members of the Boards that are AlixPartners employees. As a precautionary matter, AlixPartners maintains information barriers and guidelines designed to prevent certain confidential client information, including the names of clients likely to be involved in a not-yet-filed case under the Bankruptcy Code, from being shared with the Investors or their designees on the Boards.

To that end, no material nonpublic information about the Debtors (including, before the filing of these Chapter 11 Cases, the fact that AlixPartners was about to undertake an assignment involving the Debtors) has been or will be furnished by AlixPartners to the Investors or their Board designees, and AlixPartners will continue to abide by its confidentiality obligations to the Debtors. Each Investor is independent of each other Investor and is governed by its own board of directors or similar body and managed by its own management team. AlixPartners operates independently and does not share employees, officers or other management with any of the Investors. AlixPartners and each of the Investors have separate offices in separate buildings, use separate internet email addresses, and do not otherwise share IT systems.

AlixPartners formed and currently holds a majority and controlling ownership interest in GSS UK Holdings Limited ("***GSS***"). GSS and its subsidiaries developed a regulatory technology platform to provide global, centralized sanctions screening services to financial institutions. Various Investors, including certain AlixPartners Partners and Managing Directors and Board members, hold minority ownership interests in GSS. AlixPartners currently has a majority of the seats on the board of directors of GSS. GSS does not share office space or IT systems with AlixPartners, but does share certain employees and services such as finance systems. The names of GSS's investors and customers (but not its vendors and employees) are loaded into the database where AlixPartners' connections are stored and are disclosed as part of the disclosure process described herein.

AlixPartners has one database where connections are stored for all entities in the Holdings Enterprise. The process for the preparation of disclosures is as follows: upon receipt of a potential parties in interest list from the Debtors and/or their representatives (the "***Parties in Interest List***"), all such parties are input to the database by team members familiar with the database. A report of the "hits" is generated, and the team members review those "hits" for connections. Where there is a connection, a disclosure is drafted. After the team completes draft disclosures, the disclosures are reviewed by an in-house bankruptcy attorney. The attorney coordinates with the team to finalize the disclosures, which are then reviewed by the engagement's Partner and Managing Director. These initial disclosures (the "***Initial Disclosures***") are thereafter filed with the Bankruptcy Court as part of the retention pleadings.

Promptly thereafter, a bankruptcy paralegal in the firm uses the Initial Disclosures and the Parties in Interest List to draft a firmwide email for each bankruptcy filing, including the Debtors' cases. This email is sent to every firm employee as well as the members of the Boards and the Lakeview Parties. The firmwide email requests each recipient to review the attached file that includes the parties in interest and corresponding disclosures,

and asks that every recipient: (a) contact the legal department in the event that they have a connection or relationship with an interested party that is not included in our disclosures; (b) if they have a connection or relationship with an interested party that is included in our disclosures, confirm that it is accurately described; and (c) contact the legal department if they own securities of the Debtors. Members of the legal team review all email responses and draft any supplemental disclosures appropriate to reflect information received in response to the firmwide email. After the review process described in the immediately preceding paragraph, supplemental disclosures are thereafter filed with the Bankruptcy Court.

After the Initial Disclosures are filed with the Bankruptcy Court, AlixPartners also provides the names of the Debtors, their owners/investors, lenders and, on a case-by-case basis, other named entities (collectively, the "***Investor Search Parties***"), to the Institutional Investors, and requests that each Institutional Investor run a check of the Investor Search Parties across all investment portfolios including, upon reasonable investigation, (i) private and public funds, (ii) loan positions, and (iii) known positions across CLO holdings (all of the foregoing subject to the exceptions listed below, the "***Investor Connections Check***"). The exceptions to the Investor Connections Check are (i) investments over which the Institutional Investors do not possess actual investment authority and discretion ("direct control"), (ii) index replication position, (iii) investments owned in separate accounts managed by independent parties not affiliated with the Institutional Investors, and (iv) pooled investment vehicles in which the Institutional Investors do not exercise actual control or in which the Institutional Investors do not have visibility sufficient to ascertain such vehicle's investments. Members of the legal team review all responses received from the Institutional Investors and draft disclosures appropriate to reflect information received from the Institutional Investors that, following review, are filed with the Bankruptcy Court.

Upon receipt of the responses from the Institutional Investors to the Investor Connections Check, AlixPartners will file any supplemental disclosures which may be required.

To the extent AlixPartners learns of connections that are not included herein, AlixPartners will promptly file a supplemental disclosure.

Further, AlixPartners may have had, currently have or may in the future have business relationships with, among other entities, portfolio companies of the Institutional Investors and portfolio companies of private equity funds in which they are limited partners, in matters unrelated to the Debtors or their affiliates in these Chapter 11 Cases. Based on, among other things, the business separation between each of the Investors and AlixPartners, the contractual client confidentiality obligations of AlixPartners and the information barriers referred to above, AlixPartners believes that it does not hold or represent an interest adverse to the estate with respect to any such engagement.

Other than as specifically noted herein, AlixPartners has not undertaken to determine the existence, nature, and/or full scope of any business relationships or connections that the Investors may have with the Investor Search Parties, the Debtors and their affiliates, and other parties in interest in these Chapter 11 Cases.

Specifically, AlixPartners obtained from the Debtors and/or their representatives the Parties in Interest List, which is attached hereto as Schedule 1 and conducted a search for connections in accordance with the procedures set forth above.

AlixPartners represents that, to the best of its knowledge, it knows of no fact or situation that would represent a conflict of interest, cause it not to be disinterested or hold or represent an interest adverse to the Debtors' estates, and furthermore wishes to the disclose the following with respect to the Holdings Enterprise (collectively, "***AP***" unless otherwise noted):

- AP interacts with U.S. Bankruptcy Court judges and representatives of the U.S. Trustee Program regularly in its capacity as a professional consulting firm that offers turnaround and restructuring services.

- AP has issued debt in the form of a USD-denominated senior secured term loan, and a Euro-denominated senior secured term loan (collectively, the "***Term Loans***"), as well as revolving credit facility (the "***Revolving Credit Facility***").

  Bank of America, N.A. serves as the Administrative Agent for the Term Loans and the Revolving Credit Facility and as such manages all trading of the Term Loans and Revolving Credit Facility between investors. Many of the holders of the Term Loans are pools organized by banks, mutual fund management companies and other fund managers (collectively, "***Fund Managers***") who pool debt instruments issued by multiple / different borrowers and offer interests in the pools to investors. The identities of the investors in the pools cannot be ascertained by AP. The Term Loans are actively traded. Thus, the list of Fund Managers and other investors directly holding the Term Loans can become outdated quickly. On a monthly basis, AP reviews the list of investors in the Term Loans for the purpose of making relationship disclosures in chapter 11 cases. As of the last monthly report, no Fund Manager or other investor in the Term Loans held greater than 10% of the combined US-denominated and Euro-denominated Term Loans. In the event that any entity accumulates a 10% or greater interest in the combined US-denominated and Euro-denominated Term Loans, AP will disclose the name of such entity.

  The participants in the Revolving Credit Facility are Bank of America, N.A., Credit Suisse, Deutsche Bank AG Host Bank, Goldman Sachs Lending Partners LLC, HSBC Bank USA, NA, and JPMorgan Chase Bank N.A.

- The Internal Revenue Service ("***IRS***") is a current and former AP client in matters unrelated to the Debtors. The IRS is a lender, lienholder and adverse litigation party to current and former AP clients in matters unrelated to the Debtors.

- The United States Department of Justice ("***DOJ***"), including the United States Attorney General's Office, is a current and former client of AP in matters unrelated to the Debtors. The DOJ is a litigation party, adverse litigation party, lessor, opposing

counsel and professional to current and former AP clients in matters unrelated to the Debtors.

- AP follows a practice to solicit from the members of its Boards their connections to the parties in interest independent of AP. In response, one or more of the members of its Boards have offered the following disclosures:

  - Ace American Insurance Company (Chubb), Ace Fire Underwriters Insurance Company (Chubb), Federal Insurance Company, Federal Insurance Company (Chubb), Illinois Union Insurance Company (Chubb), Indemnity Insurance Company of North America (Chubb) and Westchester Fire Insurance Company are insurance providers, surety bond issuers & beneficiaries to the Debtors. Chubb is a vendor to an AP investor or one of its affiliates. AP has a group insurance program in place for all US managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from Chubb, an affiliate of ACE, at group rates.

  - American Express, a supplier and vendor to the Debtors, is a vendor to an AP investor or one of its affiliates.

  - AT&T and AT&T Mobility are utility providers to the Debtors. AT&T Mobility is a vendor to an AP investor or one of its affiliates.

  - Bank of America, N.A., a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, is a lender to an AP investor or one of its affiliates.

  - Blue Cross of California and Blue Cross of California dba Anthem Blue Cross are customers, surety bond issuers & beneficiaries to the Debtors. Blue Cross Blue Shield of Michigan is a vendor to an AP investor or one of its affiliates.

  - DE Shaw & Co. is a major equity holder, trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors. An AP investor or one of its affiliates had an investment in D.E. Shaw Orienteer LLC.

  - FIAM LLC an affiliate of Fidelity Investments is a trustee, agent, secured lender (including certain bondholders) to the Debtors. Fidelity Investments is a vendor to an AP investor or one of its affiliates.

  - JP Morgan Chase Bank, N.A. is a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors. J.P. Morgan Investment Management Inc. is a vendor to an AP investor or one of its affiliates.

  - Judge Marvin Isgur is a United States Bankruptcy Judge for the Southern District of Texas. A Board member had litigation matters unrelated to the Chapter 11 Cases in a consolidated dispute before Judge Isgur. AP was neither a plaintiff nor a defendant in the matters.

- Lazard Freres & Co. LLC is a professional for other major stakeholders in these Chapter 11 Cases. An AP investor or one of its affiliates had an investment in Lazard Ltd.

- Metropolitan West Asset Management is a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors. Metropolitan West Management LLC is a vendor to an AP investor or one of its affiliates.

- Optum Bank and OptumRx, Inc. are employee insurance program administrators to the Debtors. A member of AP's board of directors is an officer of Optum (a UnitedHealth Group company) and a former employee of United.

- Pricewaterhouse Coopers LLP is an ordinary course professional to the Debtors. An AP Board member and an employee of one of his affiliates are former employees of PwC.

- Quinn Emanuel Urquhart & Sullivan LLP, a restructuring professional to the Debtors, is a current or former legal services provider to an AP investor or one of its affiliates.

- Travelers Casualty and Surety Company of America is an insurance provider, surety bond issuer & beneficiary to the Debtors. The Travelers Indemnity Company is a vendor to an AP investor or one of its affiliates.

- U.S. Bancorp and U.S. Bank Equipment Finance are banking service providers, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors. US Bank is a vendor to an AP investor or one of its affiliates.

- United Healthcare Services Inc. is an unsecured creditor to the Debtors. A member of AP's board of directors is a member of the board of directors of UnitedHealth Group, Inc.

- Windstream is a utility provider to the Debtors. Windstream Communications Company is a vendor to an AP investor or one of its affiliates.

- A significant number of parties in interest that are categorized as landlords to the Debtors are and/or were lessors to current and former AP clients in matters unrelated to the Debtors. To the extent AP has additional connections to parties in these categories, they are disclosed herein.

- A significant number of parties in interest that are categorized as taxing authorities and /or utility providers to the Debtors are and/or were adverse litigation parties, non-adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors. To the extent AP has additional connections to parties in these categories, they are disclosed herein.

- 11:11 Systems, Inc., a utility provider to the Debtors, is a former AP client in matters unrelated to the Debtors.

- Ace American Insurance Company (Chubb), Ace Fire Underwriters Insurance Company (Chubb), Federal Insurance Company, Federal Insurance Company (Chubb), Illinois Union Insurance Company (Chubb), Indemnity Insurance Company of North America (Chubb) and Westchester Fire Insurance Company, insurance providers, surety bond issuers & beneficiaries to the Debtors, and affiliated entities ("***Chubb***"), are affiliates, bondholders, litigation parties, adverse litigation parties, lenders, lessors and non-adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Chubb is a current and former AP client in matters unrelated to the Debtors. AP has a group insurance program in place for all US managing directors and AP board members under which personal excess liability (umbrella) insurance may be purchased from Chubb, an affiliate of ACE, at group rates. Chubb is an insurance provider to AP.

- ADT US Holdings Inc. and The ADT Security Corporation, utility providers to the Debtors, and affiliated entities, are former AP clients in matters unrelated to the Debtors.

- AllianceBernstein Holding LP, a noteholder to the Debtors, and affiliated entities ("***AllianceBernstein***"), are lenders, shareholders, adverse litigation parties and bondholders to current and former AP clients in matters unrelated to the Debtors. AllianceBernstein is a current AP client in matters unrelated to the Debtors. AllianceBernstein is a vendor to AP.

- Allianz Global Risks US` Insurance Company, an insurance provider to the Debtors, and affiliated entities ("***Allianz***"), are associated companies, bondholders, litigation parties, adverse litigation parties, lenders, lienholders, parent companies and shareholders to current and former AP clients in matters unrelated to the Debtors. Allianz is a current and former AP client in matters unrelated to the Debtors. Allianz is a former employer of current AP employees. Allianz is an insurance provider to AP.

- Allspring Global Investments, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, is a shareholder to former AP clients in matters unrelated to the Debtors.

- Amazon Web Services, Inc., an unsecured creditor to the Debtors, and affiliated entities ("***Amazon***"), are litigation parties, adverse litigation parties, non-adverse litigation parties, related parties and professionals to current AP clients in matters unrelated to the Debtors. Amazon is a current and former AP client in matters unrelated to the Debtors. Amazon is a former employer of current AP employees. Amazon is a vendor to AP.

- American Electric Power, a utility provider to the Debtors, is a former AP client in matters unrelated to the Debtors.

- American Express, a supplier and vendor to the Debtors, and affiliated entities ("***AmEx***"), are lessors, adverse litigation parties and director-affiliated companies to current and former AP clients in matters unrelated to the Debtors. AmEx was a member of the official committee of unsecured creditors that retained AP in Orbital Infrastructure Group, Inc., a former bankruptcy matter unrelated to the Debtors. AmEx is a former employer of current AP employees. AmEx is a vendor to AP which includes an incentive program based on value, but it is not attributed to any particular person or any specific purchases.

- Amerigroup Partnership Plan, LLC, a surety bond issuer & beneficiary to the Debtors, is an adverse litigation party to former AP clients in matters unrelated to the Debtors.

- Ameriprise Financial, a noteholder to the Debtors, is a bondholder, lender and shareholder to current and former AP clients in matters unrelated to the Debtors.

- Ankura Trust Company, LLC, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Ankura***"), are lenders, lienholders and professionals to current and former AP clients in matters unrelated to the Debtors. Ankura is a former AP client in matters unrelated to the Debtors. Ankura is a former employer of current AP employees.

- Anybill, an ordinary course professional to the Debtors, is a professional to a former AP client in matters unrelated to the Debtors.

- Arch Insurance Company and Arch Specialty Insurance Company, insurance providers to the Debtors, and affiliated entities ("***Arch***"), are bondholders, adverse litigation parties, professionals, lenders and non-adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Arch is a current AP client in matters unrelated to the Debtors. Arch is an insurance provider to AP.

- Aristotle Capital Boston, LLC, a major equity holder to the Debtors, and affiliated entities, are bondholders to a former AP client in matters unrelated to the Debtors.

- AT&T and AT&T Mobility, utility providers to the Debtors, and affiliated entities ("***AT&T***"), are lessors to a current AP client in matters unrelated to the Debtors. AT&T is a current and former AP client in matters unrelated to the Debtors. AT&T was a member of the official committees of unsecured creditors that retained AP in Windstream Holdings, Inc., Forever 21, Inc., Fusion Connect and Pareteum Corporation, former bankruptcy matters unrelated to the Debtors. AT&T is a vendor to AP.

- Atlantic Specialty Insurance Company, an insurance provider to the Debtors, is a bondholder and adverse litigation party to current AP clients in matters unrelated to the Debtors. Atlantic Specialty is an insurance provider to AP.

- Automatic Data Processing, Inc., an employee insurance program administrator to the Debtors, and affiliated entities ("***ADP***"), are director-affiliated companies, lessors,

professionals and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. ADP is a former AP client in matters unrelated to the Debtors. ADP is a former employer of a current AP employee. ADP is an employee benefits provider to AP.

- Bank of America, N.A., a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Bank of America***"), are bondholders, non-adverse litigation parties, litigation parties, adverse litigation parties, investors, lenders, lessors, lienholders, shareholders, director-affiliated companies and professionals to current and former AP clients in matters unrelated to the Debtors. Bank of America is a current and former AP client in matters unrelated to the Debtors. Bank of America is a former employer of current AP employees. Bank of America is a vendor to AP.

- Barclays Bank Plc, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Barclays***"), are bondholders, non-adverse litigation parties, lenders, lienholders, professionals, litigation parties, adverse litigation parties and shareholders to current and former AP clients in matters unrelated to the Debtors. Barclays is a current and former AP client in matters unrelated to the Debtors. Barclays is a former employer of current AP employees. Barclays is a GSS client.

- Barrow, Hanley, Mewhinney & Strauss LLC, a major equity holder to the Debtors, is a lender to current and former AP clients in matters unrelated to the Debtors.

- Beach Point Capital Management, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are bondholders, lenders, lienholders and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.

- Berkshire Hathaway Specialty Insurance Company, an insurance provider to the Debtors, and affiliated entities ("***Berkshire Hathaway***"), are bondholders, adverse litigation parties, parent companies and investors to current and former AP clients in matters unrelated to the Debtors. Berkshire Hathaway is a current and former AP client in matters unrelated to the Debtors. Berkshire Hathaway is an insurance provider to AP.

- Birch Grove Capital, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are lenders to current and former AP clients in matters unrelated to the Debtors.

- Blackrock, a noteholder to the Debtors, and affiliated entities ("***Blackrock***"), are bondholders, adverse litigation parties, investors, lenders, lessors, lienholders, limited partners, parent companies and shareholders to current and former AP clients in matters unrelated to the Debtors. BlackRock is a current and former AP client in matters unrelated to the Debtors.

- Blue Cross of California and Blue Cross of California dba Anthem Blue Cross, customers, surety bond issuers & beneficiaries to the Debtors, and affiliated entities ("***BCBS***"), are adverse litigation parties, non-adverse litigation parties, bondholders, lenders, lienholders, director-affiliated companies and professionals to current and former AP clients in matters unrelated to the Debtors. BCBS is a current and former AP client in matters unrelated to the Debtors.

- BNP Paribas S.A., a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***BNP***"), are bondholders, adverse litigation parties, lenders, lessors, lienholders, litigation parties, joint venture entities, professionals and shareholders to current and former AP clients in matters unrelated to the Debtors. BNP is a current and former AP client in matters unrelated to the Debtors. BNP is a former employer of current AP employees. BNP is a vendor to AP. BNP is a GSS client.

- Bradley Arant Boult Cummings LLP ("***Bradley Arant***"), an ordinary course professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Bradley Arant is a current and former AP client in matters unrelated to the Debtors.

- Brigade Capital Management, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Brigade***"), are adverse litigation parties, bondholders, lenders, lienholders, parent companies and shareholders to current and former AP clients in matters unrelated to the Debtors. Brigade is a current AP client in matters unrelated to the Debtors.

- Broadridge ICS, an unsecured creditor and customer to the Debtors, and affiliated entities, are professionals to current and former AP clients in matters unrelated to the Debtors.

- Canadian Imperial Bank, CIBC Bank USA, Imperial Bank of Canada and Privatebank and Trust Company, noteholders, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors, and affiliated entities, are adverse litigation parties, bondholders, investors, lenders, shareholders and lienholders to current and former AP clients in matters unrelated to the Debtors.

- CBIZ, Inc., an employee insurance program administrator to the Debtors, and affiliated entities ("***CBIZ***"), are professionals to current and former AP clients in matters unrelated to the Debtors. CBIZ is a current and former AP client in matters unrelated to the Debtors.

- CDW Direct, an unsecured creditor to the Debtors, and affiliated entities ("***CDW***"), are lessors to a former AP client in matters unrelated to the Debtors. CDW is a former AP client in matters unrelated to the Debtors. CDW is a vendor to AP.

- CGP Development Co Inc., a landlord to the Debtors, and affiliated entities, are affiliates to a former AP client in matters unrelated to the Debtors.

- Charter Communications, a utility provider to the Debtors, and affiliated entities ("***Spectrum***"), are lessees to current AP clients in matters unrelated to the Debtors. Spectrum is a current and former AP client in matters unrelated to the Debtors.

- Cintas Corporation No. 2, a utility provider to the Debtors, and affiliated entities, are vendors to AP.

- Citizens Bank, N.A., a banking service provider to the Debtors, and affiliated entities ("***Citizens Bank***"), are lenders, lienholders and professionals to current and former AP clients in matters unrelated to the Debtors. Citizens Bank is a former AP client in matters unrelated to the Debtors.

- Comcast, a utility provider to the Debtors, and affiliated entities ("***Comcast***"), are parent companies to a former AP client in matters unrelated to the Debtors. Comcast is a former AP client in matters unrelated to the Debtors.

- Comerica Bank, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Comerica***"), are lenders, adverse litigation parties, bondholders, lessors and shareholders to current and former AP clients in matters unrelated to the Debtors. Comerica is a former AP client in matters unrelated to the Debtors.

- Commonwealth Edison Company, a utility provider to the Debtors, and affiliated entities ("***ComEd***"), are bondholders to current and former AP clients in matters unrelated to the Debtors. ComEd is a former AP client in matters unrelated to the Debtors.

- Continental Casualty Company (CNA), an insurance provider to the Debtors, and affiliated entities ("***CNA***"), are affiliates, bondholders, adverse litigation parties, non-adverse litigation parties, lenders and litigation parties to current and former AP clients in matters unrelated to the Debtors. CNA is an insurance provider to AP.

- Cox Communications Arizona, LLC, a utility provider to the Debtors, and affiliated entities ("***Cox***"), are former AP clients in matters unrelated to the Debtors. Cox is a former employer of a current AP employee.

- David Coulter, a former Director to the Debtors, is an officer to a current AP client in matters unrelated to the Debtors.

- DE Shaw & Co., a major equity holder, trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***D.E. Shaw***"), are investors, shareholders, bondholders and lenders to current AP clients in matters unrelated to the Debtors. D.E. Shaw is a current and former AP client in matters unrelated to the Debtors.

- Deutsche Bank Ag New York Branch, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities

("***Deutsche Bank***"), are bondholders, adverse litigation parties, litigation parties, joint venture entities, lenders, lienholders, professionals and shareholders to current and former AP clients in matters unrelated to the Debtors. Deutsche Bank is a current and former AP client in matters unrelated to the Debtors. Deutsche Bank is a former employer of current AP employees. Deutsche Bank is a GSS client.

- Dialpad Inc., a utility provider to the Debtors, is an affiliate to a current AP client in matters unrelated to the Debtors.

- Elevance Health, Inc., a surety bond issuer & beneficiary to the Debtors, is a non-adverse litigation party to a current AP client in matters unrelated to the Debtors.

- Endurance American Insurance Company and Endurance American Insurance Company (Sompo), insurance providers to the Debtors, and affiliated entities ("***Sompo***"), are non-adverse litigation parties, bondholders, professionals, joint venture entities, related parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Sompo is a current and former AP client in matters unrelated to the Debtors. Sompo is an insurance provider to AP.

- Ensign Peak Advisors, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, is a lender and bondholder to current and former AP clients in matters unrelated to the Debtors. Ensign Peak Advisors is a former AP client in matters unrelated to the Debtors.

- Entergy Utility Holding Company, LLC, a utility provider to the Debtors, and affiliated entities ("***Entergy***"), are bondholders to a former AP client in matters unrelated to the Debtors. Entergy is a former AP client in matters unrelated to the Debtors.

- Ernst & Young US LLP, an ordinary course professional to the Debtors, and affiliated entities ("***Ernst & Young***"), are professionals, director-affiliated companies and non-adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Ernst & Young is a former AP client in matters unrelated to the Debtors. Ernst & Young is a former employer of current AP employees. Ernst & Young is a tax advisor to AP.

- FIAM LLC an affiliate of Fidelity Investments, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Fidelity***"), are bondholders, adverse litigation parties, non-adverse litigation parties, joint venture entities, lenders, professionals, shareholders, lessors and lienholders to current and former AP clients in matters unrelated to the Debtors. Fidelity is a former employer of a current AP employee. Fidelity is an employee benefits provider to AP.

- FirstEnergy Corp. and Monongahela Power Co., utility providers to the Debtors, and affiliated entities ("***FirstEnergy***"), are lenders and associated companies to current AP clients in matters unrelated to the Debtors. FirstEnergy is a current and former AP client in matters unrelated to the Debtors.

- Florida Power and Light, a utility provider to the Debtors, is a bondholder, lender and shareholder to current and former AP clients in matters unrelated to the Debtors.

- FTI Consulting, Inc., a restructuring professional to the Debtors, and affiliated entities ("***FTI***"), are professionals to current and former AP clients in matters unrelated to the Debtors. FTI is a current and former AP client in matters unrelated to the Debtors. FTI is a former employer of current AP employees.

- Gibson, Dunn & Crutcher LLP, an ordinary course professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Gibson, Dunn & Crutcher LLP is a current and former AP client in matters unrelated to the Debtors. Gibson, Dunn & Crutcher LLP is a legal service provider to AP.

- Halseypoint Asset Management, LLC, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, is a lender to current and former AP clients in matters unrelated to the Debtors.

- Health Care Services Corporation, a customer to the Debtors, and affiliated entities ("***HCSC***"), are adverse litigation parties and parent companies to former AP clients in matters unrelated to the Debtors. HCSC is a current AP client in matters unrelated to the Debtors.

- Hewlett-Packard Financial Services Company, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***HP***"), are director-affiliated companies, lessors, lienholders, litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. HP is a current and former AP client in matters unrelated to the Debtors. HP is a former employer of current AP employees. HP is a vendor to AP.

- HG Vora Capital Management, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are lenders to current and former AP clients in matters unrelated to the Debtors.

- HSBC Bank Plc and HSBC Holdings Plc., banking service providers, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors, and affiliated entities ("***HSBC***"), are bondholders, litigation parties, adverse litigation parties, lenders, lienholders, shareholders and non-adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. HSBC is a current and former AP client in matters unrelated to the Debtors. HSBC is a former employer of current AP employees. HSBC is GSS client.

- Humana Medical Plan and Humana, Inc., unsecured creditors and major customers to the Debtors, and affiliated entities ("***Humana***"), are lessors to a current AP client in matters unrelated to the Debtors. Humana was a member of the official committee of unsecured creditors that retained AP in Rite Aid Corporation, a former bankruptcy matter unrelated to the Debtors.

- Hunton Andrews Kurth LLP, a restructuring professional to the Debtors, is a professional and counsel to current and former AP clients in matters unrelated to the Debtors. Hunton Andrews Kurth LLP is a current and former AP client in matters unrelated to the Debtors.

- Indiana Department of Revenue, a taxing authority to the Debtors, is a lienholder to a former AP client in matters unrelated to the Debtors.

- Iron Mountain Incorporated, a utility provider to the Debtors, and affiliated entities ("***Iron Mountain***"), are bondholder, lessors, professionals and associated companies to current and former AP clients in matters unrelated to the Debtors. Iron Mountain is a member of the official committee of unsecured creditors that retained AP in New Rite Aid Corporation, a bankruptcy matter unrelated to the Debtors. Iron Mountain is a vendor to AP.

- Jackson Walker LLP, counsel to the official committee of unsecured creditors in these Chapter 11 Cases, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Jackson Walker LLP is a former AP client in matters unrelated to the Debtors.

- Jefferies Finance LLC, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Jefferies***"), are bondholders, adverse litigation parties, lenders, lienholders, litigation parties, professionals and shareholders to current and former AP clients in matters unrelated to the Debtors. Jefferies is a current and former AP client in matters unrelated to the Debtors.

- JP Morgan Chase Bank, N.A., a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***JP Morgan***"), are affiliates, bondholders, litigation parties, investors, lenders, lessors, lienholders, limited partners, adverse litigation parties, non-adverse litigation parties, professionals, investment bankers, parent companies and shareholders to current and former AP clients in matters unrelated to the Debtors. JP Morgan is a current and former AP client in matters unrelated to the Debtors. JP Morgan is a former employer of current AP employees.

- Jupiter Fund Management and Jupiter Asset Management, noteholders, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors and members of the official committee of unsecured creditors in these Chapter 11 Cases, and affiliated entities, are bondholders and shareholders to former AP clients in matters unrelated to the Debtors.

- Kansas Department of Revenue, a taxing authority to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.

- Keybank, National Association, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are

bondholders, litigation parties, lenders, lessors, lienholders, adverse litigation parties and shareholders to current and former AP clients in matters unrelated to the Debtors.

- KPMG LLP, an ordinary course professional to the Debtors, and affiliated entities ("***KPMG***"), are adverse litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. KPMG is a current AP client in matters unrelated to the Debtors. KPMG is a former employer of current AP employees. KPMG is an auditor to AP.

- Kurtzman Carson Consultants, LLC (d/b/a Verita global), a restructuring professional to the Debtors, is a professional to current and former AP clients in matters unrelated to the Debtors.

- Landmark American Insurance Company, an insurance provider to the Debtors, is an adverse litigation party and non-adverse litigation party to current and former AP clients in matters unrelated to the Debtors.

- Latham & Watkins LLP ("***Latham***"), a restructuring professional to the Debtors, is a professional, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtors. Latham is a current and former AP client in matters unrelated to the Debtors. Latham is a legal service provider to AP.

- Lazard Freres & Co. LLC, a professional for other major stakeholders in these Chapter 11 Cases, and affiliated entities ("***Lazard***"), are lenders, shareholders, adverse litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. Lazard is a former AP client in matters unrelated to the Debtors. Lazard is a former employer of a current AP employee. Lazard is a vendor to AP.

- Liberty Surplus Insurance Corporation, an insurance provider to the Debtors, and affiliated entities ("***Liberty***"), are bondholders, lenders, lessors, non-adverse litigation parties, litigation parties and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Liberty is a current and former AP client in matters unrelated to the Debtors. Liberty is a former employer of a current AP employee. Liberty is an insurance provider to AP.

- Littler Mendelson PC, an ordinary course professional to the Debtors, is a professional, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtors. Littler Mendelson PC is a legal service provider to AP.

- Lyft Healthcare, Inc. and Lyft Inc., unsecured creditors, suppliers and vendors to the Debtors, and affiliated entities, are former AP clients in matters unrelated to the Debtors.

- Mariann Schroeder, a litigation party to the Debtors, is a lessor to a former AP client in matters unrelated to the Debtors.

- Mercer Insurance Company (R-T Specialty), an insurance provider to the Debtors, and affiliated entities ("***Mercer***"), are investors, lenders, lienholders, bondholders, shareholders, litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. Mercer is a vendor to AP.

- Mercury Parent, LLC, a non-Debtor affiliated in these Chapter 11 Cases, is a former AP client in matters unrelated to the Debtors.

- MetLife, Inc., an employee insurance program administrator to the Debtors, and affiliated entities, ("***MetLife***"), are non-adverse litigation parties, lenders, lessors, litigation parties, shareholders, bondholders, lienholders and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. MetLife is a former AP client in matters unrelated to the Debtors. MetLife is an employee benefits provider to AP.

- Metropolitan West Asset Management, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, is a bondholder, lender and lienholder to current and former AP clients in matters unrelated to the Debtors.

- Mississippi Department of Revenue, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.

- MJH Wacker LLC, a landlord to the Debtors, is a lender to former AP clients in matters unrelated to the Debtors.

- Moelis & Company, a restructuring professional to the Debtors, and affiliated entities ("***Moelis***"), are investment bankers, lenders, non-adverse litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. Moelis is a former AP client in matters unrelated to the Debtors. Moelis is a former employer of current AP employees.

- Morgan Stanley, a banking service provider to the Debtors, and affiliated entities ("***Morgan Stanley***"), are bondholders, litigation parties, non-adverse litigation parties, adverse litigation parties, lenders, shareholders, investors, lessors, professionals and lienholders to current and former AP clients in matters unrelated to the Debtors. Morgan Stanley is a current and former AP client in matters unrelated to the Debtors. Morgan Stanley is a former employer of current AP employees.

- National Grid, a utility provider to the Debtors, and affiliated entities ("***National Grid***"), are associated companies to a former AP client in matters unrelated to the Debtors. National Grid is a former AP client in matters unrelated to the Debtors. National Grid is a former employer of current AP employees.

- National Union Fire Insurance Company of Pittsburgh, Pa. (AIG), an insurance provider to the Debtors, and affiliated entities ("***AIG***"), are bondholders, adverse litigation parties, non-adverse litigation parties, litigation parties, investors and lessors to current and former AP clients in matters unrelated to the Debtors. AIG is a current

and former AP client in matters unrelated to the Debtors. AIG is a former employer of current AP employees.

- Neal Goldman, a former Director to the Debtors, is a director and officer to current and former AP clients in matters unrelated to the Debtors.

- Neuberger Berman Group, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Neuberger Berman***"), are lenders, bondholders, adverse litigation parties, shareholders and parent companies to current and former AP clients in matters unrelated to the Debtors. Neuberger Berman is a former AP client in matters unrelated to the Debtors.

- New Jersey Division of Taxation, a taxing authority to the Debtors, is a lienholder to a current AP client in matters unrelated to the Debtors.

- New Jersey Transit Corp., a supplier and vendor to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors

- Nicolas Herrera, a landlord to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.

- Nixon Peabody LLP, an ordinary course professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors.

- NYSEG, a utility provider to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.

- Ohio Department of Taxation, a taxing authority to the Debtors, is a lienholder and bondholder to current and former AP clients in matters unrelated to the Debtors.

- Oklahoma Complete Health, Inc. c/o Centene Corporation, a surety bond issuer & beneficiary to the Debtors, and affiliated entities, are litigation parties to a current AP client in matters unrelated to the Debtors.

- Oklahoma Tax Commission, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.

- Olive Street Investment Advisers, a noteholder to the Debtors, is a bondholder and lender to current and former AP clients in matters unrelated to the Debtors.

- Optum Bank and OptumRx, Inc., employee insurance program administrators to the Debtors, and affiliated entities, are associated companies, non-adverse litigation parties, adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors.

- Paul Hastings LLP, a professional for other major stakeholders in these Chapter 11 Cases, is a professional, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtors. Paul Hastings LLP is a current and former AP client in matters unrelated to the Debtors. Paul Hastings LLP is a vendor to AP.

- PECO Energy Company and Pennsylvania Electric Company, utility providers to the Debtors, are bondholders to a former AP client in matters unrelated to the Debtors.

- PNC Bank N.A., a banking service provider to the Debtors, and affiliated entities ("***PNC***"), are bondholders, lenders, lessors, lienholders, litigation parties, adverse litigation parties, professionals and shareholders to current and former AP clients in matters unrelated to the Debtors. PNC is a former employer of current AP employees.

- Polen Capital Management ("***Polen Capital***"), a noteholder to the Debtors, is a bondholder, parent company, shareholder, professional and lender to current and former AP clients in matters unrelated to the Debtors. Polen Capital is a former AP client in matters unrelated to the Debtors.

- Polsinelli PC, an ordinary course professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Polsinelli PC is a current and former AP client in matters unrelated to the Debtors.

- Pricewaterhouse Coopers LLP, an ordinary course professional to the Debtors, and affiliated entities ("***PwC***"), are professionals, litigation parties and non-adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. PwC is a current and former AP client in matters unrelated to the Debtors. PwC is a former employer of current AP employees. PwC is a tax advisor and M&A advisor to AP.

- PSE&G Co., a utility provider to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.

- Quinn Emanuel Urquhart & Sullivan LLP ("***Quinn Emanuel***"), a restructuring professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Quinn Emanuel is a current and former AP client in matters unrelated to the Debtors.

- Randstad North America LP, an unsecured creditor to the Debtors, and affiliated entities ("***Randstad***"), are lenders, lienholders, litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. Randstad is a vendor to AP.

- Redwood Capital Management, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are lenders, adverse litigation parties and bondholders to current and former AP clients in matters unrelated to the Debtors.

- Regions Bank, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are bondholders, lenders, lienholders, adverse litigation parties, shareholders and lessors to former AP clients in matters unrelated to the Debtors.

- Regus, a landlord to the Debtors, and affiliated entities ("***Regus***"), are shareholders and affiliates to a current and former AP clients in matters unrelated to the Debtors. Regus is a former AP client in matters unrelated to the Debtors. Regus is a vendor to AP.

- Republic Services, Inc., a utility provider to the Debtors, is a lessor to a current AP client in matters unrelated to the Debtors. Republic Services, Inc. is a former employer of a current AP employee.

- Roaring Fork Trading, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, are investors to a former AP client in matters unrelated to the Debtors.

- RSUI Indemnity Company (R-T Specialty), an insurance provider to the Debtors, and affiliated entities ("***RSUI***"), are adverse litigation parties and lenders to current and former AP clients in matters unrelated to the Debtors. RSUI is a former AP client in matters unrelated to the Debtors.

- Salesforce.Com Inc., a supplier and vendor to the Debtors, and affiliated entities ("***SalesForce***"), are investors to a former AP client in matters unrelated to the Debtors. SalesForce is a former employer of current AP employees. SalesForce is a vendor to AP.

- Scottsdale Insurance Company (Propraxis), an insurance provider to the Debtors, and affiliated entities, are adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.

- Silver Rock Financial LP and Silver Rock Management LLC, trustees, agent, secured lenders (including certain bondholders), and potential lienholders to the Debtors, and affiliated entities, are bondholders and non-adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.

- Siriuspoint America Insurance Company, a surety bond issuer & beneficiary to the Debtors, and affiliated entities, are former AP clients in matters unrelated to the Debtors.

- SL Town Center Realty, LLC, a landlord to the Debtors, is a lender to a former AP client in matters unrelated to the Debtors. SL Town Center Realty, LLC is a vendor to AP.

- State Street and SSGA Active Trust, noteholders and major equity holders to the Debtors, and affiliated entities, are bondholders, lienholders, lessors, adverse litigation

parties, litigation parties, lenders and shareholders to current and former AP clients in matters unrelated to the Debtors.

- Stericycle Inc., a utility provider to the Debtors, and affiliated entities ("***Stericycle***"), bondholder to a current AP client in matters unrelated to the Debtors. Stericycle is a former employer of a current AP employee. Stericycle is a vendor to AP.

- Stevens & Lee P.C., an ordinary course professional to the Debtors, is a professional, counsel and opposing counsel to current and former AP clients in matters unrelated to the Debtors. Stevens & Lee P.C. is a current and former AP client in matters unrelated to the Debtors.

- Sumitomo Mitsui Banking Corporation, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities, ("***SMBC***"), are adverse litigation parties, litigation parties, lenders, lienholders, lessors and shareholders to current and former AP clients in matters unrelated to the Debtors. SMBC is a current and former AP client in matters unrelated to the Debtors. SMBC is former employer of current AP employees.

- Summit House Capital Management, LLC, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, is a bondholder and lender to a current AP client in matters unrelated to the Debtors.

- TCW Group and TCW Asset Management Company, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors, and affiliated entities, are investors, lenders and lienholders to current and former AP clients in matters unrelated to the Debtors.

- Texas Comptroller of Public Accounts, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.

- The Agency for Health Care Administration, a taxing authority to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.

- The Cigna Group, an employee insurance program administrator to the Debtors, and affiliated entities ("***CIGNA***"), are director-affiliated companies, adverse litigation parties, bondholders, lenders and professionals to current and former AP clients in matters unrelated to the Debtors. CIGNA is a vendor to AP.

- The City of Norton, a landlord to the Debtors, is an adverse litigation party to current and former AP clients in matters unrelated to the Debtors.

- The Commonwealth of Virginia, a surety bond issuer & beneficiary to the Debtors, is an adverse litigation party and litigation party to current and former AP clients in matters unrelated to the Debtors.

- The Connecticut Light and Power Co., a utility provider to the Debtors, is a bondholder to a current AP client in matters unrelated to the Debtors.

- The Pennsylvania Public Utility Commission, a surety bond issuer & beneficiary to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors.

- The State of Alabama, a taxing authority to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.

- The State of Florida, Agency for Health Care Administration, a surety bond issuer & beneficiary to the Debtors, is a bondholder to a former AP client in matters unrelated to the Debtors.

- The State of New Jersey, a surety bond issuer & beneficiary to the Debtors, is an adverse litigation party, limited partner and litigation party to current and former AP clients in matters unrelated to the Debtors.

- The Vanguard Group, a major equity holder to the Debtors, and affiliated entities ("***Vanguard***"), are bondholders, shareholders, adverse litigation parties and lenders to current and former AP clients in matters unrelated to the Debtors. Vanguard is a former AP client in matters unrelated to the Debtors.

- The We Company Management Holdings L.P. and WeWork, landlords to the Debtors, and affiliated entities, are associated companies, adverse litigation parties and litigation parties to current and former AP clients in matters unrelated to the Debtors.

- T-Mobile USA Inc., a utility provider to the Debtors, and affiliated entities ("***T-Mobile***"), are lessors to current AP clients in matters unrelated to the Debtors. T-Mobile is a former AP client in matters unrelated to the Debtors. T-Mobile is a former employer of a current AP employee.

- Travelers Casualty and Surety Company of America, an insurance provider, surety bond issuer & beneficiary to the Debtors, and affiliated entities ("***Travelers***"), are bondholders, non-adverse litigation parties, adverse litigation parties, investors, lenders, limited partners and professionals to current and former AP clients in matters unrelated to the Debtors. Travelers is a current and former AP client in matters unrelated to the Debtors. Travelers is an insurance provider to AP.

- Truist Financial Corporation, a banking service provider to the Debtors, and affiliated entities, are lenders, adverse litigation parties, bondholders and shareholders to current and former AP clients in matters unrelated to the Debtors.

- U.S. Bancorp and U.S. Bank Equipment Finance, banking service providers, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors, and affiliated entities ("***U.S. Bank***"), are bondholders, lienholders, shareholders, professionals, lessors, adverse litigation parties, professionals, and

lenders to current and former AP clients in matters unrelated to the Debtors. U.S. Bank is a current and former AP client in matters unrelated to the Debtors. U.S. Bank was member of the official committee of unsecured creditors that retained AP in Enviva, iMedia Brands, Inc., Tops Holding II Corporation and Vertex Energy, Inc., former bankruptcy matters unrelated to the Debtors. U.S. Bank is a member of the official committee of unsecured creditors that retained AP in New Rite Aid, LLC, a bankruptcy matter unrelated to the Debtors.

- Uber Health LLC, an unsecured creditor to the Debtors and a member of the official committee of unsecured creditors in these Chapter 11 Cases, and affiliated entities ("***Uber***"), are lienholders to a current AP client in matters unrelated to the Debtors. Uber is a current and former AP client in matters unrelated to the Debtors. Uber is a former employer of a current AP employee.

- United Healthcare Services Inc., an unsecured creditor to the Debtors, and affiliated entities ("***United Healthcare***"), are associated companies, litigation parties, adverse litigation parties, non-adverse litigation parties, lenders and lienholders to current and former AP clients in matters unrelated to the Debtors. United Healthcare is a former AP client in matters unrelated to the Debtors.

- Veolia Water New Jersey Inc., a utility provider to the Debtors, and affiliated entities ("***Veolia***"), were members of the official committee of unsecured creditors that retained AP in Ascend Performance Materials Holdings Inc., a former bankruptcy matter unrelated to the Debtors. Veolia is a former AP client in matters unrelated to the Debtors.

- Veracity Benefits, LLC, an employee insurance program administrator to the Debtors, and affiliated entities, are former employers of a current AP employee.

- Verizon Communications Inc., a utility provider to the Debtors, and affiliated entities ("***Verizon***"), are lessors to a current AP client in matters unrelated to the Debtors. Verizon is a current and former AP client in matters unrelated to the Debtors.

- Vital Records Holdings LLC, a utility provider to the Debtors, is a vendor to AP.

- Voya Financial, Inc., an employee insurance program administrator to the Debtors, and affiliated entities, are lenders, lienholders, shareholders, adverse litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors.

- VXI Global Solutions LLC, a supplier and vendor to the Debtors, is an affiliate to a former AP client in matters unrelated to the Debtors.

- Webster Bank, N.A., a banking service provider to the Debtors, is a lender to a former AP client in matters unrelated to the Debtors. Webster Bank, N.A. is a current AP client in matters unrelated to the Debtors.

- WellCare Affiliates, a surety bond issuer & beneficiary to the Debtors, and affiliated entities, are lenders to a current AP client in matters unrelated to the Debtors.

- Wells Fargo Bank, N.A., a banking service provider, trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Wells Fargo***"), are bondholders, litigation parties, director-affiliated companies, lenders, lessors, lienholders, shareholders, professionals and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors. Wells Fargo is a current and former AP client in matters unrelated to the Debtors. Wells Fargo was a member of the official committee of unsecured creditors that retained AP in 24 Hour Fitness Worldwide, Inc. and Extraction Oil & Gas, Inc., former bankruptcy matters unrelated to the Debtors.

- Westfield Select Insurance Company, an insurance provider to the Debtors, and affiliated entities, are insurance providers to AP.

- Wex Inc., an employee insurance program administrator to the Debtors, is an adverse litigation party to a former AP client in matters unrelated to the Debtors. Wex Inc. is an employee benefits provider to AP.

- White & Case LLP, counsel to the official committee of unsecured creditors in these Chapter 11 Cases, is a professional, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtors. White & Case LLP is a current and former AP client in matters unrelated to the Debtors. White & Case LLP is a former employer of a current AP employee. White & Case LLP is a vendor to AP.

- Willcox Savage Consulting LLC, an ordinary course professional to the Debtors, is a professional and counsel to current and former AP clients in matters unrelated to the Debtors.

- Wilmington Savings Fund Society, FSB, Wilmington Savings Fund Society, FSB As Indentured Trustee and WSFS Bank, unsecured creditors, trustees, agents, secured lenders (including certain bondholders), and potential lienholders to the Debtors and members of the official committee of unsecured creditors in these chapter 11 cases, and affiliated entities ("***WSFS***"), are bondholders, lenders, adverse litigation parties, non-adverse litigation parties and professionals to current and former AP clients in matters unrelated to the Debtors. WSFS was a member of the official committee of unsecured creditors that retained AP in EP Energy Corporation, Chesapeake Energy Corporation, Extraction Oil & Gas, Inc., and ION Geophysical Corporation, former bankruptcy matters unrelated to the Debtors.

- Wilmington Trust, a trustee, agent, secured lender (including certain bondholders), and potential lienholder to the Debtors, and affiliated entities ("***Wilmington***"), are bondholders, lenders, adverse litigation parties, shareholders and lienholders to current and former AP clients in matters unrelated to the Debtors. Wilmington is a former AP client in matters unrelated to the Debtors. Wilmington was a member of the official

committee of unsecured creditors that retained AP in EP Energy Corporation, a former bankruptcy matter unrelated to the Debtors.

- Windstream, a utility provider to the Debtors, and affiliated entities ("***Windstream***"), are affiliates to a former AP client in matters unrelated to the Debtors. Windstream is a former AP client in matters unrelated to the Debtors. AP was retained by the official committee of unsecured creditors in Windstream Holdings, Inc., a former bankruptcy matter unrelated to the Debtors.

- Winston & Strawn LLP, counsel to the official committee of unsecured creditors in these Chapter 11 Cases, is a professional, opposing counsel and counsel to current and former AP clients in matters unrelated to the Debtors. Winston & Strawn LLP is a current and former AP client in matters unrelated to the Debtors. Winston & Strawn LLP is a legal service provider to AP.

- WM Corporate Services, Inc., a utility provider to the Debtors, and affiliated entities, are lessors to current and former AP clients in matters unrelated to the Debtors.

- Workday Inc., a supplier and vendor to the Debtors, is a professional to current and former AP clients in matters unrelated to the Debtors. Workday Inc. is a former AP client in matters unrelated to the Debtors.

- XL Specialty Insurance Company, an insurance provider to the Debtors, and affiliated entities ("***AXAXL***"), are non-adverse litigation parties, adverse litigation parties, lenders, shareholders, bondholders, litigation parties and lessors to current and former AP clients in matters unrelated to the Debtors. AXAXL is a former AP client in matters unrelated to the Debtors. AXAXL is a former employer of a current AP employee. AXAXL is an insurance provider to AP.

United States Bankruptcy Court
Southern District of Texas
ENTERED
October 14, 2025
Nathan Ochsner, Clerk

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)
Debtors.[1]	:	(Jointly Administered)

ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS
[Relates to Motion at Docket No. 335]

Upon the motion (the "***Motion***")[2] of the Debtors for entry of an order (this "***Order***") establishing procedures for interim compensation and reimbursement of expenses for professionals and official committee members, all as more fully set forth in the Motion; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary, except as set forth in the Motion with respect to entry of this Order; and upon the record herein; and after due deliberation thereon; and all objections, if any, to the

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Motion.

Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. All Professionals in the Chapter 11 Cases may seek compensation in accordance with the following procedures (collectively, the "***Compensation Procedures***"):

a. On or after the fifth day of each month following the month for which compensation is sought, each Professional seeking interim allowance of its fees and expenses who (i) has been, or is hereafter, retained pursuant to sections 327 or 1103 of the Bankruptcy Code and (ii) is not retained as an Ordinary Course Professional, shall send a reasonably detailed monthly statement indicating the nature of the services rendered and expenses incurred (each, a "***Monthly Fee Statement***"), by e-mail, to the following parties (collectively, the "***Notice Parties***"):

i. the Debtors, ModivCare Inc., 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237, Attn: Faisal Khan (Faisal.Khan@modivcare.com);

ii. proposed co-counsel to the Debtors, Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020, Attn: Ray Schrock, Keith A. Simon, George Klidonas, and Jonathan Weichselbaum (ray.schrock@lw.com, keith.simon@lw.com, george.klidonas@lw.com, and jon.weichselbaum@lw.com);

iii. proposed co-counsel to the Debtors, Hunton Andrews Kurth LLP, 600 Travis Street, Suite 4200, Houston, Texas 77002, Attn: Tad Davidson, and Brandon Bell (taddavidson@hunton.com, and bbell@hunton.com);

iv. the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Jana Whitworth, Andrew Jimenez, and Alina Samko-Yu (janawhitworth@usdoj.gov, andrew.jimenez@usdoj.gov, and alina.samko-yu@usdoj.com);

v. counsel to the First Lien Agent and the Consenting Creditors, Paul Hastings LLP, 71 S. Wacker Drive, Forty-Fifth Floor, Chicago, IL 60606 (Attn: Kris Hansen, Matt Warren, and Lindsey Henrikson

(krishansen@paulhastings.com, mattwarren@paulhastings.com, and lindseyhenrikson@paulhastings.com); and

vi. proposed counsel to the Committee, White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020, Attn: Andrew Zatz, Greg Pesce, and Stephen Ludovici (azatz@whitecase.com, gregory.pesce@whitecase.com, and stephen.ludovici@whitecase.com).

Any Professional that fails to submit a Monthly Fee Statement for a particular month or months may subsequently submit a consolidated Monthly Fee Statement that includes a request for compensation earned or expenses incurred during such previous month(s). All Monthly Fee Statements shall comply with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and applicable law. The first Monthly Fee Statement submitted by each Professional serving as of the Petition Date will cover the period from the Petition Date through and including September 30, 2025. Thereafter, each Monthly Fee Statement shall cover one calendar month (except to the extent that a Professional files a consolidated Monthly Fee Statement, as set forth above).

b. Each Notice Party will have until 4:00 p.m. (prevailing Central Time) on the day that is fourteen days after delivery of a Monthly Fee Statement (the "***Objection Deadline***") to object to the requested fees and expenses in accordance with the procedures described in subparagraph (c) below. Upon the expiration of the Objection Deadline, the Debtors shall promptly pay the applicable Professional an amount equal to 80% of the fees and 100% of the expenses requested in the applicable Monthly Fee Statement (the "***Actual Monthly Payment***") that are not subject to an objection pursuant to subparagraph (c) below.

c. If any Notice Party objects to a Professional's Monthly Fee Statement, such party must serve via e-mail on such Professional and each other Notice Party a written objection (an "***Objection***") so as to be received on or before the Objection Deadline. Any such Objection must identify with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses, and the basis for such Objection. Thereafter, the objecting party and the affected Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution within fourteen days after delivery of the Objection or such later date as both parties agree (the "***Resolution Period***"), the objecting party shall file its Objection with the Court within 3 business days of the expiration of the Resolution Period and serve such Objection on the affected Professional and each of the other Notice Parties. Thereafter, the affected Professional may either (i) file a response to the Objection with the Court or (ii) forego payment of the amount subject to Objection until the next Interim Fee Application or Final Fee Application hearing, at which time the affected Professional may request that the Court consider the Objection. For the avoidance of doubt, the applicable Professional may receive payment of any of the Actual Monthly Payment that is not subject to Objection after the expiration of the Objection Deadline.

d. Beginning with the period ending November 30, 2025, and at three month intervals thereafter (each, an "***Interim Fee Period***"), each Professional shall file with the Court and serve on the Notice Parties an interim fee application (an "***Interim Fee Application***") for allowance of compensation and reimbursement of expenses sought in the Monthly Fee Statements submitted during such Interim Fee Period and prepared in accordance with the Compensation Procedures. Interim Fee Applications may be filed after the close of each Interim Fee Period. Interim Fee Applications must comply with sections 330 and 331 of the Bankruptcy Code, applicable provisions of the Bankruptcy Rules, Bankruptcy Local Rules, and any other applicable procedures and orders of the Court. The Notice Parties will have twenty-one days after service of an Interim Fee Application to object thereto. The first Interim Fee Application shall cover the Interim Fee Period from the Petition Date through and including November 30, 2025. Notwithstanding anything to the contrary in the Compensation Procedures, a Professional may file a combined Interim Fee Application with its fee application for final allowance of compensation and reimbursement of expenses (a "***Final Fee Application***" and, together with the Interim Fee Applications, the "***Applications***").

e. The Court, in its discretion, may approve an uncontested Interim Fee Application or Final Fee Application without the need for a hearing, upon the Professional's filing of a certificate of no objection or certificate of counsel. Upon allowance by the Court of a Professional's Interim Fee Application, the Debtors shall be authorized to promptly pay such Professional all requested fees (including the 20% holdback) and expenses not previously paid.

f. The pendency of an Objection to payment of compensation or reimbursement of expenses shall not disqualify a Professional from the future payment of compensation or reimbursement of expenses not previously paid pursuant to the Compensation Procedures, unless otherwise ordered by the Court.

2. Neither (a) the payment of or the failure to pay, in whole or in part, a Monthly Fee Statement under the Compensation Procedures nor (b) the filing of or failure to file an Objection with the Court will bind any party in interest or the Court with respect to the final allowance of applications for compensation and reimbursement of expenses of Professionals. All fees and expenses paid to Professionals under the Compensation Procedures are subject to challenge and disgorgement until final allowance by the Court.

3. Each member of any official committee formed by the U.S. Trustee is permitted to submit statements of expenses incurred in the performance of the duties of the committee (excluding third-party counsel expenses of individual committee members) and supporting

vouchers to the respective committee's counsel, which counsel shall collect and file the committee members' requests for reimbursement with this Court in accordance with the Compensation Procedures.

4. The Professionals shall serve the Monthly Fee Statements only on the Notice Parties and shall file Applications with the Court. The Professionals shall serve Hearing Notices concerning Applications on all other parties that have filed a notice of appearance with the Clerk of the Court and requested notice of pleadings in the Chapter 11 Cases.

5. A Professional shall not seek payment in a Final Fee Application for any amounts that such Professional previously sought in a Monthly Fee Statement or Interim Fee Application if (a) such Professional voluntarily waived or reduced such amounts to resolve formal or informal objections or (b) such amounts were disallowed by order of the Court.

6. All notices given in accordance with the Compensation Procedures shall be deemed sufficient and adequate notice and in full compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

7. Notice of the Motion as provided therein shall be deemed good and sufficient notice and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

10. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: October 12, 2025

Alfredo R Pérez
United States Bankruptcy Judge

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

In re:	)	
	)	
	)	Chapter 11
MODIVCARE, INC, *et al*.[1]	)	
	)	Case No. 25-90309 (ARP)
Debtors.	)	(Jointly Administered)
	)	
	)	**Re: Docket No. 472**

CERTIFICATE OF NO OBJECTION TO THE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, the Official Committee of Unsecured Creditors (the "**Committee**") of the above-captioned debtors and debtors in possession hereby certifies as follows:

1. On October 8, 2025, the Committee filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* [Docket No. 472] (the "**Application**"). The Application attached a proposed order (the "**Proposed Order**").

2. On October 21, 2025, the Committee filed a revised proposed *Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* [Docket No. 562] (the "**Revised Proposed Order**").

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

3. The deadline for parties to file a response to the Application was October 29, 2025 (the "**Response Deadline**").

4. No formal responses were filed on the Court's docket prior to the Response Deadline. The Committee did not receive any informal comments, except from the Office of the United States Trustee, which comments were resolved by the revisions made in the Revised Proposed Order.

5. The Revised Proposed Order is attached hereto as **Exhibit A**.

The Committee requests that the Court enter the Order granting the relief requested in the Application and such other relief as the Court deems appropriate under the circumstances.

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October 30, 2025
Houston, Texas

/s/ Charles R. Koster

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- and -

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Proposed Counsel for the Official Committee of Unsecured Creditors

Certificate of Service

I certify that on October 30, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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

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

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

[Relates to Docket No. 472]

Upon the application (the "**Application**")[2] of the Committee for entry of an order (this "**Order**") pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "**Bankruptcy Code**"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and rules 2014-1, 2016 and 9013-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Southern District of Texas (the "**Local Rules**"), authorizing the employment and retention of White & Case LLP ("**White & Case**") effective as of September 9, 2025 as the Committee's counsel; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Application and the relief requested therein

[1] A complete list of each of the Debtors in the 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.

[2] Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Application having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and the Committee having incorporated informal comments received from the U.S. Trustee in this Order; and the U.S. Trustee having consented to entry of this Order; and a hearing having been held, if necessary, to consider the relief requested in the Application (the "**Hearing**"); and upon consideration of the Declarations attached to the Application, and the record of the Hearing, if any, and all of the proceedings had before the Court; and the Court having found and determined that White & Case does not represent or hold any interest adverse to the Debtors' estates, and is a "disinterested person" as that term is defined under section 101(14) of the Bankruptcy Code and, as required by section 328 of the Bankruptcy Code, that the relief sought in the Application is necessary and in the best interests of the Committee, the Debtors, their estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. Pursuant to sections 328 and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014, the Committee is authorized to employ and retain White & Case as its counsel in these Chapter 11 Cases in accordance with the terms and conditions set forth in the Pesce Declaration and Application, as modified by this Order, effective as of September 9, 2025.

2. In connection with these Chapter 11 Cases, White & Case shall be compensated and reimbursed for expenses in accordance with, and will file, interim and final fee applications

for allowance of its compensation and expenses incurred in connection with these Chapter 11 Cases and shall be subject to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any applicable orders of the Court, and pursuant to any additional procedures this Court deems appropriate. For billing purposes, White & Case shall keep its time in one tenth (1/10) hour increments.

3. To the extent that White & Case uses contract attorneys who are hired by White & Case to provide services to the Committee, White & Case shall (i) pass-through the cost of such attorneys to the Debtors at the same rate that White & Case pays such attorneys, (ii) seek reimbursement for actual out-of-pocket expenses only, and (iii) ensure that such attorneys are subject to the same conflict checks and disclosures as required of White & Case by Bankruptcy Rule 2014.

4. White & Case shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

5. White & Case will review its files periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

6. White & Case shall provide ten (10) business-days' notice to the Committee, the Debtors, and U.S. Trustee before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to

Section 330 of the Bankruptcy Code. Notwithstanding anything to the contrary in the Application, or the Declarations attached thereto, White & Case shall not be entitled to reimbursement for fees and expenses incurred in connection with any objection to its fees, without further order from the Court.

7. The Debtors and the Committee are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. To the extent that the Application and the Declarations attached thereto are inconsistent with this Order, the terms of this Order shall govern.

10. Notice of the Application as provided therein shall be deemed good and sufficient notice of the Application.

11. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2025
Houston, Texas

_____
THE HONORABLE ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

United States Bankruptcy Court
Southern District of Texas
ENTERED
October 31, 2025
Nathan Ochsner, Clerk

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

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

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025

[Relates to Docket No. 472]

Upon the application (the "**Application**")[2] of the Committee for entry of an order (this "**Order**") pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "**Bankruptcy Code**"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") and rules 2014-1, 2016 and 9013-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Southern District of Texas (the "**Local Rules**"), authorizing the employment and retention of White & Case LLP ("**White & Case**") effective as of September 9, 2025 as the Committee's counsel; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Application and the relief requested therein

[1] A complete list of each of the Debtors in the 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.

[2] Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Application having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and the Committee having incorporated informal comments received from the U.S. Trustee in this Order; and the U.S. Trustee having consented to entry of this Order; and a hearing having been held, if necessary, to consider the relief requested in the Application (the "**Hearing**"); and upon consideration of the Declarations attached to the Application, and the record of the Hearing, if any, and all of the proceedings had before the Court; and the Court having found and determined that White & Case does not represent or hold any interest adverse to the Debtors' estates, and is a "disinterested person" as that term is defined under section 101(14) of the Bankruptcy Code and, as required by section 328 of the Bankruptcy Code, that the relief sought in the Application is necessary and in the best interests of the Committee, the Debtors, their estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. Pursuant to sections 328 and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014, the Committee is authorized to employ and retain White & Case as its counsel in these Chapter 11 Cases in accordance with the terms and conditions set forth in the Pesce Declaration and Application, as modified by this Order, effective as of September 9, 2025.

2. In connection with these Chapter 11 Cases, White & Case shall be compensated and reimbursed for expenses in accordance with, and will file, interim and final fee applications

for allowance of its compensation and expenses incurred in connection with these Chapter 11 Cases and shall be subject to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any applicable orders of the Court, and pursuant to any additional procedures this Court deems appropriate. For billing purposes, White & Case shall keep its time in one tenth (1/10) hour increments.

3. To the extent that White & Case uses contract attorneys who are hired by White & Case to provide services to the Committee, White & Case shall (i) pass-through the cost of such attorneys to the Debtors at the same rate that White & Case pays such attorneys, (ii) seek reimbursement for actual out-of-pocket expenses only, and (iii) ensure that such attorneys are subject to the same conflict checks and disclosures as required of White & Case by Bankruptcy Rule 2014.

4. White & Case shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

5. White & Case will review its files periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

6. White & Case shall provide ten (10) business-days' notice to the Committee, the Debtors, and U.S. Trustee before any increases in the rates set forth in the Application are implemented and shall file such notice with the Court. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in Section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to

Section 330 of the Bankruptcy Code. Notwithstanding anything to the contrary in the Application, or the Declarations attached thereto, White & Case shall not be entitled to reimbursement for fees and expenses incurred in connection with any objection to its fees, without further order from the Court.

7. The Debtors and the Committee are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. To the extent that the Application and the Declarations attached thereto are inconsistent with this Order, the terms of this Order shall govern.

10. Notice of the Application as provided therein shall be deemed good and sufficient notice of the Application.

11. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Signed: October 31, 2025

Alfredo R Pérez
United States Bankruptcy Judge

United States Bankruptcy Court
Southern District of Texas
ENTERED
November 03, 2025
Nathan Ochsner, Clerk

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)
Debtors. [1]	§	(Jointly Administered)

ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO EMPLOY AND RETAIN ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025
[Relates to Docket No. 473]

Upon the application (the "***Application***")[2] of the Official Committee of Unsecured Creditors (the "***Committee***") appointed in these Chapter 11 Cases of the above-captioned Debtors (the "***Debtors***") for entry of an order (this "***Order***"), pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the "***Bankruptcy Code***"), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***") and rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas, Houston Division (the "***Local Rules***"), authorizing the Committee to employ and retain AlixPartners, LLP ("***AlixPartners***") as the Committee's financial advisor, effective as of September 10, 2025; and upon consideration of the Declaration of David MacGreevey (the "***MacGreevey Declaration***"); and it appearing that AlixPartners is "disinterested" and eligible for retention pursuant to sections 101(14) and 328(c)

[1] A complete list of each of the Debtors in these 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.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

of the Bankruptcy Code; and the Court having found the terms and conditions of AlixPartners' employment, including, but not limited to, the Fee and Expense Structure set forth in the Engagement Letter and Application, are reasonable under section 330 of the Bankruptcy Code; and the Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue of this case and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Application; and the Court having held a hearing on the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Application is in the best interest of the Debtors, their estates, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation, and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is approved as set forth in this Order.

2. Pursuant to sections 328(a) and 1103 of the Bankruptcy Code, the Committee is authorized to employ and retain AlixPartners as its financial advisor in connection with these Chapter 11 Cases effective as of September 10, 2025, and in accordance with the terms and conditions set forth in the Engagement Letter attached to the Application as **Exhibit B**.

3. The terms of the Engagement Letter, including, without limitation, the indemnification provisions, are reasonable, and the conditions of employment are approved in all respects, as modified by this Order.

4. AlixPartners may file monthly and interim requests for allowance of compensation and reimbursement of expenses and shall file final requests for allowance of compensation and reimbursement of expenses (collectively, the "***Fee Applications***"). AlixPartners' Fee Applications shall comply with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and Local Rules, the Fee Guidelines and any other such procedures as may be fixed by order of the Court. AlixPartners shall keep its time in one-tenth (1/10) hour increments.

5. AlixPartners' compensation terms set forth in the Engagement Letter, including, without limitation, the Fee and Expense Structure, are approved, and the Debtors shall be bound by such terms. AlixPartners shall be compensated for the services identified in the Application, the MacGreevey Declaration and the Engagement Letter and reimbursed for out-of-pocket expenses incurred in connection with such services, pursuant to section 328(a) of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court.

6. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

7. The indemnification provisions included in the Engagement Letter are approved, subject to the following:

a. No AlixPartners Party (as that term is defined in the Engagement Letter) shall be entitled to indemnification, contribution, or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution, or reimbursement therefore are approved by the Court.

b. The Debtors shall have no obligation to indemnify AlixPartners, or provide contribution or reimbursement to AlixPartners, for any claim or expense that is either: (i) judicially determined (the determination having become final and no longer subject to appeal) to have arisen from AlixPartners Party's gross negligence, bad faith, fraud, or willful misconduct; or (ii) settled prior to a judicial determination as to AlixPartners gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by the Court after notice and hearing to be a claim or expense for which the AlixPartners Party should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter, as modified by this Order.

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in these Chapter 11 Cases (that order having become a final order no longer subject to appeal) and (ii) the entry of an order closing these Chapter 11 Cases, an AlixPartners Party believes that it is entitled to the payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution and/or reimbursement obligations under the Engagement Letter (as modified by this Order), including, without limitation, the advancement of defense costs, the AlixPartners Party must file an application therefor in the Court, and the Debtors may not pay any such amounts to the AlixPartners Party before the entry of an order by the Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by any AlixPartners Party for indemnification, contribution and/or reimbursement, and is not a provision limiting the duration of the Debtors' obligation to indemnify, or make contributions or reimbursements to, AlixPartners. All parties in interest shall retain the right to object to any demand by any AlixPartners Party for indemnification, contribution and/or reimbursement.

8. Any limitation of liability set forth in the Engagement Letter, or otherwise, is hereby eliminated for the duration of these Chapter 11 Cases.

9. The relief granted herein shall be binding upon any chapter 11 trustee appointed in these Chapter 11 Cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of these Chapter 11 Cases to cases under chapter 7.

10. To the extent there is any inconsistency between this Order, the Engagement Letter and the Application, the terms of this Order shall govern.

11. AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases.

12. The Committee and AlixPartners are authorized and empowered to take all necessary actions to implement the relief granted in this Order.

13. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: November 03, 2025

Alfredo R Pérez
United States Bankruptcy Judge

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

In re:	)	
	)	
	)	Chapter 11
MODIVCARE, INC, *et al*.[1]	)	
	)	Case No. 25-90309 (ARP)
Debtors.	)	(Jointly Administered)
	)	
	)	**Re: Docket No. 473**

CERTIFICATE OF COUNSEL TO THE APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, the Official Committee of Unsecured Creditors (the "**Committee**") of the above-captioned debtors and debtors in possession hereby certifies as follows:

1. On October 8, 2025, the Committee filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* [Docket No. 473] (the "**Application**"). The Application attached a proposed order (the "**Proposed Order**").

2. The deadline for parties to file a response to the Application was October 29, 2025 (the "**Response Deadline**").

3. No formal responses were filed on the Court's docket prior to the Response Deadline. The Committee did not receive any informal responses, except for comments from the

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

Office of the United States Trustee, which comments were resolved by the revisions made in a revised proposed order (the "**Revised Order**") which is attached hereto as **Exhibit A**. A redline of the Revised Order against the Proposed Order attached to the Application is attached hereto as **Exhibit B**.

The Committee requests that the Court enter the Revised Order granting the relief requested in the Application and such other relief as the Court deems appropriate under the circumstances.

[*Remainder of Page Intentionally Left Blank*]

November 3, 2025
Houston, Texas

/s/ Charles R. Koster

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WHITE & CASE LLP
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- and -

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Counsel for the Official Committee of Unsecured Creditors

Certificate of Service

I certify that on November 3, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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)
Debtors. [1]	§	(Jointly Administered)

ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO EMPLOY AND RETAIN ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025

Upon the application (the "***Application***")[2] of the Official Committee of Unsecured Creditors (the "***Committee***") appointed in these Chapter 11 Cases of the above-captioned Debtors (the "***Debtors***") for entry of an order (this "***Order***"), pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the "***Bankruptcy Code***"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***") and Rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas, Houston Division (the "***Local Rules***"), authorizing the Committee to employ and retain AlixPartners, LLP ("***AlixPartners***") as the Committee's financial advisor, effective as of September 10, 2025; and upon consideration of the Declaration of David MacGreevey (the "***MacGreevey Declaration***"); and it appearing that AlixPartners is "disinterested" and eligible for retention pursuant to sections 101(14) and 328(c) of the Bankruptcy Code; and the Court having found the terms and conditions of AlixPartners'

[1] A complete list of each of the Debtors in these 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.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

employment, including, but not limited to, the Fee and Expense Structure set forth in the Engagement Letter and Application, are reasonable under section 330 of the Bankruptcy Code; and the Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue of this case and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Application; and the Court having held a hearing on the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Application is in the best interest of the Debtors, their estates, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation, and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is approved as set forth in this Order.

2. Pursuant to sections 328(a) and 1103 of the Bankruptcy Code, the Committee is authorized to employ and retain AlixPartners as its financial advisor in connection with these Chapter 11 Cases effective as of September 10, 2025, and in accordance with the terms and conditions set forth in the Engagement Letter and the MacGreevey Declaration attached to the Application as **Exhibit B**, as modified by this Order.

3. The terms of the Engagement Letter, including, without limitation, the indemnification provisions, are reasonable, and the conditions of employment are approved in all respects, as modified by this Order.

4. AlixPartners may file monthly and interim requests for allowance of compensation and reimbursement of expenses and shall file final requests for allowance of compensation and reimbursement of expenses (collectively, the "***Fee Applications***"). AlixPartners' Fee Applications shall comply with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and the Local Rules, the Fee Guidelines and any other such procedures as may be fixed by order of the Court. AlixPartners shall keep its time in one-tenth (1/10) hour increments.

5. AlixPartners' compensation terms set forth in the Engagement Letter, including, without limitation, the Fee and Expense Structure, are approved, and the Debtors shall be bound by such terms. AlixPartners shall be compensated for the services identified in the Application, the MacGreevey Declaration and the Engagement Letter and reimbursed for out-of-pocket expenses incurred in connection with such services, pursuant to section 328(a) of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court; *provided,* in the event that, during the pendency of these Chapter 11 Cases, AlixPartners seeks reimbursement of any attorneys' fees and/or expenses, the invoices and supporting time records from such attorneys shall be included in AlixPartners' fee applications and such invoices and time records shall be in compliance with the Bankruptcy Local Rules and subject to approval of the Court under the standards of sections 330 and 331 of the Bankruptcy Code without regard to whether such professional has been retained under section 327 of the Bankruptcy Code; *provided further*, that AlixPartners shall not seek reimbursement from the Debtors' estates for any fees incurred in defending any of AlixPartners' fee applications in these Chapter 11 Cases.

6. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

7. The indemnification provisions included in the Engagement Letter are approved, subject to the following:

a. No AlixPartners Party (as that term is defined in the Engagement Letter) shall be entitled to indemnification, contribution, or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution, or reimbursement therefore are approved by the Court.

b. The Debtors shall have no obligation to indemnify AlixPartners, or provide contribution or reimbursement to AlixPartners, for any claim or expense that is either: (i) judicially determined (the determination having become final and no longer subject to appeal) to have arisen from AlixPartners Party's fraud, gross negligence, bad faith, fraud, or willful misconduct; or (ii) settled prior to a judicial determination as to AlixPartners gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by the Court after notice and hearing to be a claim or expense for which the AlixPartners Party should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter, as modified by this Order.

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in these Chapter 11 Cases (that order having become a final order no longer subject to appeal) and (ii) the entry of an order closing these Chapter 11 Cases, an AlixPartners Party believes that it is entitled to the payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution and/or reimbursement obligations under the Engagement Letter (as modified by this Order), including, without limitation, the advancement of defense costs, the AlixPartners Party must file an application therefor in the Court, and the Debtors may not pay any such amounts to the AlixPartners Party before the entry of an order

> by the Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by any AlixPartners Party for indemnification, contribution and/or reimbursement, and is not a provision limiting the duration of the Debtors' obligation to indemnify, or make contributions or reimbursements to, AlixPartners. All parties in interest shall retain the right to object to any demand by any AlixPartners Party for indemnification, contribution and/or reimbursement.

8. To the extent the Committee wishes to materially expand the scope of AlixPartners' services beyond those services set forth in the Engagement Letters, the MacGreevey Declaration, or this Order, the Committee shall be required to seek further approval from this Court. The Committee shall file notice of any proposed additional services (the "***Proposed Additional Services***") and any underlying engagement agreement with the Court and serve such notice on the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, and any party requesting notice under Bankruptcy Rule 2002. If no such party files an objection within 14 days of the Committee filing such notice, the Proposed Additional Services and any underlying engagement agreement may be approved by the Court by further order without further notice or hearing. To the extent any such party objects within 14 days of notice of such Proposed Additional Services being served, the Committee will promptly schedule a hearing before the Court on such matter. The Proposed Additional Services will not be effective unless and until they are approved by the Court. All additional services shall be subject to the provisions of this Order.

9. AlixPartners shall provide ten business-days' notice to the Debtors, the U.S. Trustee, and the Committee before any increases in the hourly rates set forth in the Application or the Engagement Letters are implemented. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

10. Any limitation of liability set forth in the Engagement Letter, or otherwise, is hereby eliminated for the duration of these Chapter 11 Cases.

11. The relief granted herein shall be binding upon any chapter 11 trustee appointed in these Chapter 11 Cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of these Chapter 11 Cases to cases under chapter 7.

12. To the extent there is any inconsistency between this Order, the Engagement Letter and the Application, the terms of this Order shall govern.

13. AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases.

14. The Committee and AlixPartners are authorized and empowered to take all necessary actions to implement the relief granted in this Order.

15. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025

_____
THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

Redline

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)
Debtors. [1]	§	(Jointly Administered)

ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO EMPLOY AND RETAIN ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025

Upon the application (the "***Application***")[2] of the Official Committee of Unsecured Creditors (the "***Committee***") appointed in these Chapter 11 Cases of the above-captioned Debtors (the "***Debtors***") for entry of an order (this "***Order***"), pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the "***Bankruptcy Code***"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***") and Rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas, Houston Division (the "***Local Rules***"), authorizing the Committee to employ and retain AlixPartners, LLP ("***AlixPartners***") as the Committee's financial advisor, effective as of September 10, 2025; and upon consideration of the Declaration of David MacGreevey (the "***MacGreevey Declaration***"); and it appearing that AlixPartners is "disinterested" and eligible for retention pursuant to sections 101(14) and 328(c) of the Bankruptcy Code; and the Court having found the terms and conditions of AlixPartners'

[1] A complete list of each of the Debtors in these 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.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

employment, including, but not limited to, the Fee and Expense Structure set forth in the Engagement Letter and Application, are reasonable under section 330 of the Bankruptcy Code; and the Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue of this case and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Application; and the Court having held a hearing on the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Application is in the best interest of the Debtors, their estates, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation, and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is approved as set forth in this Order.

2. Pursuant to sections 328(a) and 1103 of the Bankruptcy Code, the Committee is authorized to employ and retain AlixPartners as its financial advisor in connection with these Chapter 11 Cases effective as of September 10, 2025, and in accordance with the terms and conditions set forth in the Engagement Letter and the MacGreevey Declaration attached to the Application as **Exhibit B**, as modified by this Order.

3. The terms of the Engagement Letter, including, without limitation, the indemnification provisions, are reasonable, and the conditions of employment are approved in all respects, as modified by this Order.

4. AlixPartners may file monthly and interim requests for allowance of compensation and reimbursement of expenses and shall file final requests for allowance of compensation and reimbursement of expenses (collectively, the "***Fee Applications***"). AlixPartners' Fee Applications shall comply with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and the Local Rules, the Fee Guidelines and any other such procedures as may be fixed by order of the Court. AlixPartners shall keep its time in one-tenth (1/10) hour increments.

5. AlixPartners' compensation terms set forth in the Engagement Letter, including, without limitation, the Fee and Expense Structure, are approved, and the Debtors shall be bound by such terms. AlixPartners shall be compensated for the services identified in the Application, the MacGreevey Declaration and the Engagement Letter and reimbursed for out-of-pocket expenses incurred in connection with such services, pursuant to section 328(a) of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court; *provided,* in the event that, during the pendency of these Chapter 11 Cases, AlixPartners seeks reimbursement of any attorneys' fees and/or expenses, the invoices and supporting time records from such attorneys shall be included in AlixPartners' fee applications and such invoices and time records shall be in compliance with the Bankruptcy Local Rules and subject to approval of the Court under the standards of sections 330 and 331 of the Bankruptcy Code without regard to whether such professional has been retained under section 327 of the Bankruptcy Code; *provided further*, that AlixPartners shall not seek reimbursement from the Debtors' estates for any fees incurred in defending any of AlixPartners' fee applications in these Chapter 11 Cases.

6. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

7. The indemnification provisions included in the Engagement Letter are approved, subject to the following:

a. No AlixPartners Party (as that term is defined in the Engagement Letter) shall be entitled to indemnification, contribution, or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution, or reimbursement therefore are approved by the Court.

b. The Debtors shall have no obligation to indemnify AlixPartners, or provide contribution or reimbursement to AlixPartners, for any claim or expense that is either: (i) judicially determined (the determination having become final and no longer subject to appeal) to have arisen from AlixPartners Party's fraud, gross negligence, bad faith, fraud, or willful misconduct; or (ii) settled prior to a judicial determination as to AlixPartners gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by the Court after notice and hearing to be a claim or expense for which the AlixPartners Party should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter, as modified by this Order.

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in these Chapter 11 Cases (that order having become a final order no longer subject to appeal) and (ii) the entry of an order closing these Chapter 11 Cases, an AlixPartners Party believes that it is entitled to the payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution and/or reimbursement obligations under the Engagement Letter (as modified by this Order), including, without limitation, the advancement of defense costs, the AlixPartners Party must file an application therefor in the Court, and the Debtors may not pay any such amounts to the AlixPartners Party before the entry of an order

by the Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by any AlixPartners Party for indemnification, contribution and/or reimbursement, and is not a provision limiting the duration of the Debtors' obligation to indemnify, or make contributions or reimbursements to, AlixPartners. All parties in interest shall retain the right to object to any demand by any AlixPartners Party for indemnification, contribution and/or reimbursement.

8. To the extent the Committee wishes to materially expand the scope of AlixPartners' services beyond those services set forth in the Engagement Letters, the MacGreevey Declaration, or this Order, the Committee shall be required to seek further approval from this Court. The Committee shall file notice of any proposed additional services (the "***Proposed Additional Services***") and any underlying engagement agreement with the Court and serve such notice on the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, and any party requesting notice under Bankruptcy Rule 2002. If no such party files an objection within 14 days of the Committee filing such notice, the Proposed Additional Services and any underlying engagement agreement may be approved by the Court by further order without further notice or hearing. To the extent any such party objects within 14 days of notice of such Proposed Additional Services being served, the Committee will promptly schedule a hearing before the Court on such matter. The Proposed Additional Services will not be effective unless and until they are approved by the Court. All additional services shall be subject to the provisions of this Order.

9. AlixPartners shall provide ten business-days' notice to the Debtors, the U.S. Trustee, and the Committee before any increases in the hourly rates set forth in the Application or the Engagement Letters are implemented. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

~~8.~~10. Any limitation of liability set forth in the Engagement Letter, or otherwise, is hereby eliminated for the duration of these Chapter 11 Cases.

~~9.~~11. The relief granted herein shall be binding upon any chapter 11 trustee appointed in these Chapter 11 Cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of these Chapter 11 Cases to cases under chapter 7.

~~10.~~12. To the extent there is any inconsistency between this Order, the Engagement Letter and the Application, the terms of this Order shall govern.

~~11.~~13. AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases.

~~12.~~14. The Committee and AlixPartners are authorized and empowered to take all necessary actions to implement the relief granted in this Order.

~~13.~~15. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2025

_____
THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

United States Bankruptcy Court
Southern District of Texas
ENTERED
November 04, 2025
Nathan Ochsner, Clerk

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)
Debtors. [1]	§	(Jointly Administered)

ORDER AUTHORIZING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO EMPLOY AND RETAIN ALIXPARTNERS, LLP AS ITS FINANCIAL ADVISOR EFFECTIVE AS OF SEPTEMBER 10, 2025

Upon the application (the "***Application***")[2] of the Official Committee of Unsecured Creditors (the "***Committee***") appointed in these Chapter 11 Cases of the above-captioned Debtors (the "***Debtors***") for entry of an order (this "***Order***"), pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the "***Bankruptcy Code***"), Rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***") and Rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Southern District of Texas, Houston Division (the "***Local Rules***"), authorizing the Committee to employ and retain AlixPartners, LLP ("***AlixPartners***") as the Committee's financial advisor, effective as of September 10, 2025; and upon consideration of the Declaration of David MacGreevey (the "***MacGreevey Declaration***"); and it appearing that AlixPartners is "disinterested" and eligible for retention pursuant to sections 101(14) and 328(c) of the Bankruptcy Code; and the Court having found the terms and conditions of AlixPartners'

[1] A complete list of each of the Debtors in these 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.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

employment, including, but not limited to, the Fee and Expense Structure set forth in the Engagement Letter and Application, are reasonable under section 330 of the Bankruptcy Code; and the Court having jurisdiction to consider the Application pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue of this case and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Application; and the Court having held a hearing on the Application; and the Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Application is in the best interest of the Debtors, their estates, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation, and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is approved as set forth in this Order.

2. Pursuant to sections 328(a) and 1103 of the Bankruptcy Code, the Committee is authorized to employ and retain AlixPartners as its financial advisor in connection with these Chapter 11 Cases effective as of September 10, 2025, and in accordance with the terms and conditions set forth in the Engagement Letter and the MacGreevey Declaration attached to the Application as **Exhibit B**, as modified by this Order.

3. The terms of the Engagement Letter, including, without limitation, the indemnification provisions, are reasonable, and the conditions of employment are approved in all respects, as modified by this Order.

4. AlixPartners may file monthly and interim requests for allowance of compensation and reimbursement of expenses and shall file final requests for allowance of compensation and reimbursement of expenses (collectively, the "***Fee Applications***"). AlixPartners' Fee Applications shall comply with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, applicable Bankruptcy Rules and the Local Rules, the Fee Guidelines and any other such procedures as may be fixed by order of the Court. AlixPartners shall keep its time in one-tenth (1/10) hour increments.

5. AlixPartners' compensation terms set forth in the Engagement Letter, including, without limitation, the Fee and Expense Structure, are approved, and the Debtors shall be bound by such terms. AlixPartners shall be compensated for the services identified in the Application, the MacGreevey Declaration and the Engagement Letter and reimbursed for out-of-pocket expenses incurred in connection with such services, pursuant to section 328(a) of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable orders of the Court; *provided,* in the event that, during the pendency of these Chapter 11 Cases, AlixPartners seeks reimbursement of any attorneys' fees and/or expenses, the invoices and supporting time records from such attorneys shall be included in AlixPartners' fee applications and such invoices and time records shall be in compliance with the Bankruptcy Local Rules and subject to approval of the Court under the standards of sections 330 and 331 of the Bankruptcy Code without regard to whether such professional has been retained under section 327 of the Bankruptcy Code; *provided further*, that AlixPartners shall not seek reimbursement from the Debtors' estates for any fees incurred in defending any of AlixPartners' fee applications in these Chapter 11 Cases.

6. To the extent AlixPartners uses the services of independent contractors (the "***Contractors***") in these Chapter 11 Cases, AlixPartners shall: (a) pass through the cost of such Contractors to the Debtors at the same rate that AlixPartners pays the Contractors; (b) seek reimbursement for actual costs only; (c) ensure that the Contractors are subject to the same conflict checks as required for AlixPartners; and (d) file with the Court such disclosures required by Bankruptcy Rule 2014.

7. The indemnification provisions included in the Engagement Letter are approved, subject to the following:

a. No AlixPartners Party (as that term is defined in the Engagement Letter) shall be entitled to indemnification, contribution, or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution, or reimbursement therefore are approved by the Court.

b. The Debtors shall have no obligation to indemnify AlixPartners, or provide contribution or reimbursement to AlixPartners, for any claim or expense that is either: (i) judicially determined (the determination having become final and no longer subject to appeal) to have arisen from AlixPartners Party's fraud, gross negligence, bad faith, fraud, or willful misconduct; or (ii) settled prior to a judicial determination as to AlixPartners gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by the Court after notice and hearing to be a claim or expense for which the AlixPartners Party should not receive indemnity, contribution, or reimbursement under the terms of the Engagement Letter, as modified by this Order.

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in these Chapter 11 Cases (that order having become a final order no longer subject to appeal) and (ii) the entry of an order closing these Chapter 11 Cases, an AlixPartners Party believes that it is entitled to the payment of any amounts by the Debtors on account of the Debtors' indemnification, contribution and/or reimbursement obligations under the Engagement Letter (as modified by this Order), including, without limitation, the advancement of defense costs, the AlixPartners Party must file an application therefor in the Court, and the Debtors may not pay any such amounts to the AlixPartners Party before the entry of an order

> by the Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by any AlixPartners Party for indemnification, contribution and/or reimbursement, and is not a provision limiting the duration of the Debtors' obligation to indemnify, or make contributions or reimbursements to, AlixPartners. All parties in interest shall retain the right to object to any demand by any AlixPartners Party for indemnification, contribution and/or reimbursement.

8. To the extent the Committee wishes to materially expand the scope of AlixPartners' services beyond those services set forth in the Engagement Letters, the MacGreevey Declaration, or this Order, the Committee shall be required to seek further approval from this Court. The Committee shall file notice of any proposed additional services (the "***Proposed Additional Services***") and any underlying engagement agreement with the Court and serve such notice on the U.S. Trustee, any official committee appointed in these Chapter 11 Cases, and any party requesting notice under Bankruptcy Rule 2002. If no such party files an objection within 14 days of the Committee filing such notice, the Proposed Additional Services and any underlying engagement agreement may be approved by the Court by further order without further notice or hearing. To the extent any such party objects within 14 days of notice of such Proposed Additional Services being served, the Committee will promptly schedule a hearing before the Court on such matter. The Proposed Additional Services will not be effective unless and until they are approved by the Court. All additional services shall be subject to the provisions of this Order.

9. AlixPartners shall provide ten business-days' notice to the Debtors, the U.S. Trustee, and the Committee before any increases in the hourly rates set forth in the Application or the Engagement Letters are implemented. The U.S. Trustee retains all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

10. Any limitation of liability set forth in the Engagement Letter, or otherwise, is hereby eliminated for the duration of these Chapter 11 Cases.

11. The relief granted herein shall be binding upon any chapter 11 trustee appointed in these Chapter 11 Cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of these Chapter 11 Cases to cases under chapter 7.

12. To the extent there is any inconsistency between this Order, the Engagement Letter and the Application, the terms of this Order shall govern.

13. AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases.

14. The Committee and AlixPartners are authorized and empowered to take all necessary actions to implement the relief granted in this Order.

15. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: November 04, 2025

Alfredo R Pérez
United States Bankruptcy Judge

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: November 19, 2025 @ 4:00 p.m.(CT)

FIRST MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	9/10/2025	9/30/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$786,681.60 (80% of $983,352.00)	
Total expenses requested in this Fee Statement:	$2,567.78	
Total fees and expenses requested in this Fee Statement:	$789,249.38	
Blended hourly rate for professionals:	$1,042..02	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	95.1	$ 138,846.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	36.9	52,213.50
Marc Brown	Partner & Managing Director	$1,415	3.3	4,669.50
Greg Magrisi	Partner & Managing Director	$1,250	8.4	10,500.00
Jerry Wang	Partner	$1,225	4.2	5,145.00
Johnny Lee	Partner	$1,225	15.2	18,620.00
Ashutosh Panda	Director	$1,150	55.5	63,825.00
Joel Amico	Director	$1,150	93.3	107,295.00
Matthew D Gates	Director	$1,120	88.8	99,456.00
Ryan Komendowski	Director	$1,080	46.2	49,896.00
Matthew Root	Director	$1,000	35.7	35,700.00
Kaitlyn Sundt McClarren	Director	$715	2.2	1,573.00
Thomas G Prince	Senior Vice President	$950	123.2	117,040.00
Christopher Cuomo	Senior Vice President	$910	75.0	68,250.00
Jyoji Morimoto	Senior Vice President	$910	44.2	40,222.00
Susan Clark	Senior Vice President	$910	21.6	19,656.00
Chase Hood	Senior Vice President	$850	150.5	127,925.00
Sari Hammer	Senior Vice President	$660	0.8	528.00
Brooke Filler	Senior Vice President	$605	3.2	1,936.00
Jennifer Braverman	Senior Vice President	$565	26.0	14,690.00
Lucas Lovatto	Vice President	$835	13.8	11,523.00
Lisa Marie Bonito	Vice President	$580	0.6	348.00
Total Hours and Fees for Professionals			**943.7**	**$ 989,857.00**
Less: 50% Travel Fees				(6,505.00)
Total Fees for Professionals				**$ 983,352.00**
Less: 20% Holdback				(196,670.40)
Total Fees for Professionals Less Holdback				**$ 786,681.60**

Average Billing Rate	**$ 1,042.02**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	31.1	$ 35,620.00
1.2	Meetings & Communication with UCC and Creditors	72.7	87,895.50
1.3	Preparation of Committee Presentations	39.4	42,117.00
1.4	Meetings & Communication with Debtors	23.8	28,758.00
1.6	DIP Financing and Cash Collateral	213.7	227,403.00
1.7	Liquidity and Cash Management	52.0	51,159.00
1.9	Business and Strategic Plan	115.6	120,670.50
1.10	Employee Compensation and Advisor Retention Matters	16.1	15,584.00
1.11	Financial and Other Diligence	140.0	144,921.00
1.12	Other Motions and Related Objections	30.0	32,302.00
1.14	Claims Analysis	0.9	765.00
1.15	Valuation and Solvency Analysis	118.6	118,838.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	12.5	13,175.50
1.18	Court Hearings and Status Conferences	30.4	34,241.50
1.19	Retention Application & Relationship Disclosures	33.6	20,771.00
1.21	Discovery	2.3	2,626.00
1.31	Travel Time	11.0	6,505.00
	Total Hours and Fees By Matter Category Before Holdback	**943.7**	**$ 983,352.00**

Average Billing Rate $ 1,042.02

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Expense Category	Amount
Airfare	$ 340.49
Ground Transportation	529.53
Lodging	1,432.37
Meals	265.39
Total Expenses	**$ 2,567.78**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this first monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from September 10, 2025 through September 30, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $983,352.00 and reimbursement of out-of-pocket expenses in the amount of $2,567.78 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $786,681.60 (80% of $983,352.00) and 100% of out-of-pocket expenses in the amount of $2,567.78 for a total amount of $789,249.38; and (iii) such other and further relief as this Court deems proper.

Dated: November 5, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Correspondence with team re: work plan	0.4
09/10/2025	CH	Prepare working group list for counsel	0.8
09/10/2025	CH	Prepare team internal datasite and email distribution group	0.9
09/10/2025	DM	Communicate with D. Orlofsky (AlixPartners) re: ModivCare UCC work plan and staffing	0.5
09/10/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2
09/10/2025	DM	Develop ModivCare UCC work plan, strategy and related staffing	1.5
09/10/2025	DM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	GM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	KBM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	KBM	Prepare case set-up items	0.9
09/10/2025	KBM	Email to internal team re: case workstreams and next steps	0.6
09/10/2025	MB	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2
09/11/2025	AP	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	CH	Prepare internal datasite and email distribution group	0.8
09/11/2025	CH	Draft updates to working group list	0.7
09/11/2025	CC	Complete input to work plan and diligence request lists	1.4
09/11/2025	CC	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	DM	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	DM	Discussion with D. MacGreevey, M. Brown (AlixPartners) re: ModivCare investigation work plan	0.2
09/11/2025	DM	Review and comments to draft ModivCare working group list	0.5
09/11/2025	GM	Prepare for call for ModivCare re: diligence	0.3
09/11/2025	GM	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	JL	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	JL	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	KBM	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	MB	Discussion with D. MacGreevey, M. Brown (AlixPartners) re: ModivCare investigation work plan	0.2
09/11/2025	MDG	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/12/2025	LMB	Prepare Fee Application Procedures Memorandum	0.6
09/17/2025	JL	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/18/2025	CH	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	CC	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	DM	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	DM	Communication with K. McGlynn, J. Amico, J. Lee re: ModivCare work plan	0.4
09/18/2025	JA	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	JL	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	MDG	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	RK	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	TGP	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/21/2025	DM	Communicate with D. Orlofsky (AlixPartners) re: ModivCare staffing	0.5
09/24/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	LL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	SC	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
Total Professional Hours			**31.1**

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Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.2	$	9,052.00
Kathryn B McGlynn	$1,415	3.1		4,386.50
Marc Brown	$1,415	0.7		990.50
Greg Magrisi	$1,250	1.2		1,500.00
Johnny Lee	$1,225	2.6		3,185.00
Ashutosh Panda	$1,150	1.1		1,265.00
Joel Amico	$1,150	1.4		1,610.00
Matthew D Gates	$1,120	1.8		2,016.00
Ryan Komendowski	$1,080	1.6		1,728.00
Thomas G Prince	$950	1.4		1,330.00
Christopher Cuomo	$910	3.2		2,912.00
Susan Clark	$910	0.6		546.00
Chase Hood	$850	5.0		4,250.00
Lucas Lovatto	$835	0.6		501.00
Lisa Marie Bonito	$580	0.6		348.00
Total Professional Hours and Fees		**31.1**	**$**	**35,620.00**

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Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	DM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	GM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	JA	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	KBM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	RK	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/11/2025	AP	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	DM	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	JA	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	KBM	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	MB	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	MDG	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/12/2025	DM	Emails with attachment with S. Greissman, A. Zatz, E. Smith (W&C) re: additions and clarifications to ModivCare diligence tracker	0.4
09/12/2025	DM	Prepare memorandum with attachments to W&C re: updates on ModivCare work plan	0.7
09/12/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare UCC diligence and strategy	0.2
09/13/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare diligence	0.2
09/13/2025	DM	Emails with S. Greissman, A. Zatz and E. Smith (W&C) re: additions and clarifications to ModivCare diligence tracker	0.4
09/16/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	DM	Communication with A. Zatz (W&C) re: ModivCare trade vendor order	0.2
09/16/2025	DM	Discussion with S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor motion	0.4
09/16/2025	GM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JW	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JA	Discussion with S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor motion	0.4
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	JL	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	JL	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	MDG	Call with A. Zatz (W&C) re: cash management motion	0.2
09/16/2025	MDG	Call with A. Zatz (W&C) re: vendor motion	0.2
09/16/2025	MDG	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	RK	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	RK	Review documents produced for valuation analysis.	1.6
09/16/2025	TGP	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	TGP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/17/2025	DM	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	DM	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	DM	Emails with S. Greissman (W&C) and J. Amico (AlixPartners) re: ModivCare diligence	0.2
09/17/2025	JA	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	JA	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	JL	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	KBM	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	MDG	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	TGP	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/18/2025	DM	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	DM	Prepare oral presentation for ModivCare UCC meeting	0.7
09/18/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JA	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JL	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	KBM	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1

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09/18/2025	MDG	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/19/2025	CH	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	DM	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	MDG	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	MDG	Email to E. Smith (W&C) re: due diligence	0.2
09/20/2025	CH	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	CC	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	DM	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	DM	Prepare for meeting with W&C re: ModivCare DIP declaration	0.7
09/21/2025	CH	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	CC	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	DM	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	JA	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/22/2025	CH	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare valuation	0.2
09/22/2025	DM	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	DM	Prepare remarks for upcoming meeting with ModivCare UCC re: DIP objection	0.5
09/22/2025	JA	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	TGP	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/23/2025	CC	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/23/2025	DM	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/23/2025	JA	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/24/2025	KBM	Review case updates from Committee Counsel and next steps	0.6
09/25/2025	AP	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	CC	Participate in a call with J. Amico and C. Cuomo (AlixPartners) and A. Chase and others (W&C) re: document collection	0.3
09/25/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	GM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	JA	Participate in a call with J. Amico and C. Cuomo (AlixPartners) and A. Chase and others (W&C) re: document collection	0.3
09/25/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	MDG	Call with R. Beil (W&C) re: intercompany transfers	0.2

AlixPartners

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	RK	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/29/2025	DM	Communication with J. Zakia (W&C) re: ModivCare transportation network	0.3
09/29/2025	MDG	Call with A. Zatz (W&C) re: financial projections	0.2
09/29/2025	MDG	Prepare summary of critical vendor motion and send to W&C	1.0
09/30/2025	CH	Correspondence with J. Zakia and others (W&C) re: 2nd day hearing preparation	0.7
09/30/2025	DM	Attend meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, and L. Miranda (W&C) re: DIP hearing post mortem and go forward plan	2.0
09/30/2025	JA	Participate in call with J. Amico and M. Gates (AlixPartners) and E. Smith (W&C) re: disclosure statement objection	0.3
09/30/2025	MDG	Participate in call with J. Amico and M. Gates (AlixPartners) and E. Smith (W&C) re: disclosure statement objection	0.3
Total Professional Hours			**72.7**

AlixPartners

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	17.3	$	25,258.00
Kathryn B McGlynn	$1,415	8.1		11,461.50
Marc Brown	$1,415	0.6		849.00
Greg Magrisi	$1,250	3.2		4,000.00
Jerry Wang	$1,225	0.8		980.00
Johnny Lee	$1,225	3.8		4,655.00
Ashutosh Panda	$1,150	2.1		2,415.00
Joel Amico	$1,150	9.8		11,270.00
Matthew D Gates	$1,120	8.3		9,296.00
Ryan Komendowski	$1,080	4.8		5,184.00
Thomas G Prince	$950	4.9		4,655.00
Christopher Cuomo	$910	3.7		3,367.00
Chase Hood	$850	5.3		4,505.00
Total Professional Hours and Fees		**72.7**	**$**	**87,895.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Draft demonstrative for counsel for Committee presentation	0.6
09/11/2025	DM	Revise draft issues lists for ModivCare cash management, critical vendor and DIP motions	0.7
09/15/2025	CC	Begin to prepare presentation on first day motions	0.7
09/15/2025	JA	Draft of supporting slides and provide comments on first day motion summary materials	0.9
09/16/2025	CC	Finalize presentation on first day motions	0.9
09/16/2025	MDG	Review and revise presentation to Committee on first and second day motions	2.5
09/16/2025	TGP	Create slides summarizing analysis of the Debtors' first day motions	2.2
09/16/2025	TGP	Update slides summarizing analysis of the Debtors' first day motions based on internal comments	1.1
09/17/2025	CH	Draft variance and liquidity demonstrative for weekly Committee materials	1.3
09/17/2025	CC	Finalize presentation on first day motions re: critical vendor slide	1.1
09/17/2025	DM	Review, revise and comments on draft presentation for ModivCare UCC	1.2
09/17/2025	DM	Review, revise and comments on several iterations of a revised draft presentation to ModivCare re: updates	1.7
09/17/2025	JA	Draft of Committee deck re: first day motion and other updates	1.2
09/17/2025	KBM	Review and revise weekly Committee update presentation	0.9
09/17/2025	MDG	Review changes to Committee presentation re: first day motions	2.0
09/17/2025	TGP	Create slides summarizing the Debtors' actual performance to budget	0.8
09/17/2025	TGP	Update presentation slides for call with the Committee based on internal comments	0.4
09/17/2025	TGP	Update slides summarizing analysis of the Debtors' first day motions based on internal comments	0.7
09/18/2025	DM	Review and revise draft presentation to ModivCare UCC per W&C comments	0.6
09/18/2025	DM	Review ModivCare revised motion to pay trade vendors and amend UCC update deck	0.4
09/18/2025	DM	Revise draft presentation to ModivCare UCC re: weekly updates	0.5
09/18/2025	TGP	Update presentation materials for call with Committee based on comments from counsel	0.2
09/22/2025	CC	Update presentation on SOFA/SOALs re: assets	0.9
09/22/2025	CC	Update presentation on SOFA/SOALs re: claims	2.5
09/23/2025	CC	Finalize updates to presentation on SOFA/SOALs re: assets, claims, and payments	2.4
09/23/2025	CC	Update presentation on SOFA/SOALs after feedback from M. Gates of AlixPartners	2.2
09/23/2025	MDG	Review SOFA/SOAL presentation	1.8
09/24/2025	JA	Review and provide comments to Committee presentation materials	1.0
09/24/2025	KBM	Review and revise weekly Committee update presentation	0.9
09/24/2025	TGP	Update weekly slides for Committee call based on internal comments	0.7
09/25/2025	CC	Finalize updates to presentation on SOFA/SOALs re: employees	0.7
09/25/2025	TGP	Update slides summarizing analysis of SOFAs / SOALs based on responses from FTI	0.4
09/29/2025	MDG	Update SOFA/SOAL presentation for comments from K. McGlynn	0.8
09/30/2025	MDG	Finalize SOFA / SOAL presentation and send to W&C	0.4

AlixPartners

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Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	TGP	Create slides summarizing analysis of FTI's proposed fee structure	0.9
09/30/2025	TGP	Create slides summarizing analysis of Moelis' proposed fee structure	1.2
Total Professional Hours			**39.4**

AlixPartners

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Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.1	$	7,446.00
Kathryn B McGlynn	$1,415	1.8		2,547.00
Joel Amico	$1,150	3.1		3,565.00
Matthew D Gates	$1,120	7.5		8,400.00
Thomas G Prince	$950	8.6		8,170.00
Christopher Cuomo	$910	11.4		10,374.00
Chase Hood	$850	1.9		1,615.00
Total Professional Hours and Fees		**39.4**	**$**	**42,117.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/11/2025	DM	Attend meeting with C. Shandler (FTI), A. Steinberg (Moelis) re: ModivCare FA kick off	0.5
09/11/2025	DM	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	DM	Prepare for meeting with C. Shandler (FTI), A. Steinberg (Moelis) re: ModivCare financial advisor kickoff	0.5
09/11/2025	JA	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	KBM	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/12/2025	DM	Email C. Shandler (FTI) and A. Steinberg (Moelis) re: ModivCare diligence	0.3
09/13/2025	DM	Email C. Shandler (FTI) and A. Steinberg (Moelis) re: ModivCare diligence	0.3
09/15/2025	CH	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	CC	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	DM	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	JA	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	JA	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	KBM	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4
09/16/2025	MDG	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4

AlixPartners

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	DM	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	JA	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	JL	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	TGP	Email communications with FTI re: the Debtors' variance report for the period ended September 7	0.2
09/19/2025	DM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	GM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	0.2
09/19/2025	JA	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	JL	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	KBM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	RK	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	TGP	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/24/2025	MDG	Review FTI responses to questions re: SOFA and SOAL	0.5
09/25/2025	MDG	Call with J. Shapiro and D. Kiyosaki (FTI) re: intercompany transfers	0.2
09/29/2025	MDG	Correspondence with FTI re: due diligence list and call	0.5
09/30/2025	AP	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	GM	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	JW	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	JA	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	JL	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	KBM	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	MDG	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	RK	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	TGP	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
Total Professional Hours			**23.8**

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.9	$	7,154.00
Kathryn B McGlynn	$1,415	3.1		4,386.50
Greg Magrisi	$1,250	0.7		875.00
Jerry Wang	$1,225	0.5		612.50
Johnny Lee	$1,225	2.0		2,450.00
Ashutosh Panda	$1,150	0.5		575.00
Joel Amico	$1,150	4.2		4,830.00
Matthew D Gates	$1,120	2.1		2,352.00
Ryan Komendowski	$1,080	1.5		1,620.00
Thomas G Prince	$950	1.7		1,615.00
Christopher Cuomo	$910	1.3		1,183.00
Chase Hood	$850	1.3		1,105.00
Total Professional Hours and Fees		**23.8**	**$**	**28,758.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Draft potential DIP issues	0.8
09/10/2025	CH	Review DIP motion and DIP term sheet	1.7
09/10/2025	CH	Review discovery requests in connection with DIP and RSA	0.7
09/11/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/11/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/11/2025	JA	Analyze DIP budget and prepare diligence questions	1.1
09/11/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/12/2025	CH	Review initial approved DIP budget	1.1
09/12/2025	CH	Screen for potential comparable DIP facilities	1.8
09/12/2025	TGP	Analyze the Debtors' DIP motion	2.2
09/15/2025	CH	Analyze DIP financing terms for selected comparable facilities	2.8
09/15/2025	CH	Continue to analyze DIP financing terms for selected comparable facilities	2.6
09/15/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	CH	Research DIP motions and final orders for comparable DIP facilities	1.9
09/15/2025	CH	Research restructuring support agreements and disclosure statements for related comparable DIP facility cases	1.2
09/15/2025	CC	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	CC	Review 10-K and DIP budget in advance of DIP budget call	0.4
09/15/2025	CC	Review DIP comparables for inclusion in analysis on costs	0.3
09/15/2025	CC	Summarize notes from intro call for D. MacGreevey and J. Amico of AlixPartners	0.4
09/15/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	JA	Review and analysis of underlying DIP model and assumptions	1.2
09/15/2025	JA	Review DIP comps and supporting analysis	1.0
09/16/2025	CH	Analyze dilution and equity splits in relation to equitized backstop fees for comparable DIP facilities	2.3
09/16/2025	CH	Analyze disclosure statements for comparable DIP facilities re: plan equity value	1.9
09/16/2025	CH	Analyze restructuring support agreements for comparable DIP facilities re: DIP backstop fee economics	2.4
09/16/2025	CH	Review draft DIP model re: receipt buildup and transportation disbursements	0.7
09/16/2025	JA	Review DIP issues and collateral issues	1.4
09/16/2025	KBM	Review DIP budget and related items	0.7
09/17/2025	CH	Draft updates to DIP comps analysis	2.1
09/17/2025	CH	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	CH	Research re: expanded comp set for DIP facilities	1.8
09/17/2025	CH	Research re: unencumbered asset values	0.6

AlixPartners

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	CC	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	CC	Review DIP comparable transactions related to fees with a specific emphasis on backstop fees	3.0
09/17/2025	JA	Analyze potential unencumbered assets	0.8
09/17/2025	JA	Draft of issues list and supporting analysis of DIP objection	0.7
09/17/2025	JA	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	JL	Review receivables and information in DIP/Cash collateral motions	0.7
09/18/2025	CH	Analyze extended DIP budget forecast	1.2
09/18/2025	CH	Analyze Moelis DIP comp set and compare to AlixPartners comp set	1.1
09/18/2025	CH	Draft analysis re: proposed DIP financing internal rate of return	1.7
09/18/2025	CH	Internal call with M. Gates and C. Hood (AlixPartners) re: DIP comps analysis	0.5
09/18/2025	JL	Prepare for DIP financing and cash collateral motion/objection/affidavit	0.7
09/18/2025	MDG	Internal call with M. Gates and C. Hood (AlixPartners) re: DIP comps analysis	0.5
09/18/2025	MDG	Review DIP comp data	2.2
09/19/2025	CH	Analyze extended DIP budget scenario analysis	0.5
09/19/2025	CH	Call with M. Gates and C. Hood (AlixPartners) re: DIP IRR calculation and DIP comps analysis	0.3
09/19/2025	CH	Draft updated DIP comps analysis as requested by counsel	1.5
09/19/2025	CH	Draft updates to DIP comps analysis and demonstratives to reflect comments from W&C	2.1
09/19/2025	CH	Draft updates to DIP comps analysis to incorporate comments from M. Gates (AlixPartners)	1.2
09/19/2025	CH	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	CH	Research additional comparable DIP facilities in Southern District of Texas	0.6
09/19/2025	CH	Review document production related to DIP budget and prepetition liquidity reporting	1.4
09/19/2025	CH	Review restructuring proposals and board materials re: proposed backstop fee and estimated equity value	1.3
09/19/2025	CC	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	DM	Draft MacGreevey declaration in support of ModivCare DIP objection	1.0
09/19/2025	DM	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	JA	Review DIP comps and prepare issue list	0.8
09/19/2025	MDG	Call with M. Gates and C. Hood (AlixPartners) re: DIP IRR calculation and DIP comps analysis	0.3
09/19/2025	MDG	Draft bullets for W&C re: DIP comparable research	0.5
09/19/2025	MDG	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	MDG	Research two precedent DIP backstop fees	1.5
09/19/2025	MDG	Review DIP comparables schedule	2.0
09/20/2025	CH	Correspondence with team re: extended DIP forecast assumptions	0.5

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/20/2025	CH	Research re: plan equity value for ModivCare and related DIP comps	0.8
09/20/2025	CH	Review draft DIP objection	0.7
09/20/2025	CH	Review extended case timeline analysis and related assumptions	0.6
09/20/2025	CC	Review DIP budget and budget extension analysis	1.7
09/20/2025	CC	Review liquidity and DIP comparables analysis in advance of meeting with W&C	0.7
09/20/2025	DM	Analyze extended ModivCare DIP budget	0.6
09/20/2025	DM	Analyze ModivCare DIP comp set	1.0
09/20/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.7
09/20/2025	JA	Analysis and development of extended DIP budget	1.5
09/20/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.7
09/20/2025	JA	Review filings and underlying DIP budget	1.0
09/20/2025	MDG	Research comparable DIP backstop fees	0.8
09/21/2025	CH	Analyze extended budget forecast and related assumptions	0.7
09/21/2025	CH	Research re: additional potential DIP comps	1.3
09/21/2025	CC	Continue to evaluate cash flow and working capital for DIP objection	1.6
09/21/2025	CC	Review investment banking fees and associated analysis	1.4
09/21/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.5
09/21/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare case extension analysis	0.5
09/21/2025	DM	Exact research	0.3
09/21/2025	DM	Review and comments on draft objection to ModivCare DIP motion	1.0
09/21/2025	DM	Review and comments on email from J. Amico re: ModivCare DIP objection	0.3
09/21/2025	DM	Review draft extension of ModivCare DIP budget	0.8
09/21/2025	DM	Review email from S. Spitzer re: details of Exela DIP	0.2
09/21/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare case extension analysis	0.5
09/21/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.5
09/21/2025	JA	Draft of revised cash analysis to extend timeline	1.5
09/21/2025	KBM	Review DIP motion to identify potential objectionable issues	1.1
09/21/2025	KBM	Review DIP objection for potential revisions	0.9
09/21/2025	MDG	Research comparable DIP backstop fees	1.0
09/21/2025	MDG	Review draft DIP objection	0.8
09/22/2025	CH	Analyze forecasted DIP interest and DIP sizing	0.6
09/22/2025	CH	Draft analysis re: extended cash flow forecast and related assumptions	1.1
09/22/2025	CH	Review and draft updates to DIP terms comps analysis	2.1
09/22/2025	CH	Review initial draft DIP declaration and provide comments	0.5
09/22/2025	CH	Review revised DIP objection and DIP declarations	0.8
09/22/2025	CH	Review year to date actuals re: weekly and monthly operating cash flow	0.8
09/22/2025	DM	Communication with C. Hood (AlixPartners) re: ModivCare DIP comps	0.2
09/22/2025	DM	Communication with C. Hood, M. Gates and R. Komendowski (AlixPartners) re: ModivCare DIP analysis	0.5

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee	0.3
09/22/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee valuation	0.2
09/22/2025	DM	Revise draft MacGreevey declaration in support of ModivCare DIP objection	0.8
09/22/2025	JA	Analyze requests from W&C re: DIP collateral	0.5
09/22/2025	JA	Analyze seasonality and other cash flow items to develop go forward view	0.5
09/22/2025	JA	Develop go forward cash projection based on analyzing existing cash flow forecast	1.4
09/22/2025	JA	Review and provide comments on DIP objection	0.5
09/22/2025	KBM	Review D. MacGreevey declaration re: DIP objection and revisions	0.9
09/22/2025	KBM	Review sets of revisions to DIP objection	1.1
09/22/2025	MDG	Complete detailed review of DIP comparables	2.5
09/22/2025	MDG	Review and comment on DIP declaration	0.5
09/22/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee	0.3
09/22/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee valuation	0.2
09/23/2025	CH	Analyze illustrative plan valuation and related backstop fee equity value	0.8
09/23/2025	CH	Correspondence with A. Zatz and others (W&C), D. MacGreevey, J. Amico, and M. Gates (AlixPartners) re: DIP objection and DIP comps	1.2
09/23/2025	CH	Draft updates to DIP comps analysis to reflect comments from D. MacGreevey (AlixPartners)	1.8
09/23/2025	CH	Finalize DIP comps exhibits for DIP declaration	1.4
09/23/2025	CH	Research comparable DIP facilities without a backstop fee for potential inclusion into comp set	1.4
09/23/2025	CH	Review and provide comments to revised draft DIP objection and DIP declaration	1.7
09/23/2025	CC	Review DIP objection for consistency with financial analysis and other edits	0.8
09/23/2025	DM	Review draft MacGreevey declaration in support of UCC objection to ModivCare DIP motion	3.1
09/23/2025	DM	Revise MacGreevey declaration in support of UCC objection to ModivCare DIP motion	3.2
09/23/2025	JA	Analyze success fee calculations	0.3
09/23/2025	JA	Preparation of supporting schedules and analysis for DIP related declaration	1.0
09/23/2025	JA	Review DIP objection, draft comments and provide backup analysis for support	1.6
09/23/2025	JA	Review professional fee detail from DIP budget and evaluate alternative scenarios	0.7
09/23/2025	KBM	Review DIP issues list	0.4
09/23/2025	KBM	Review revised DIP budget sensitivity analysis	0.9
09/23/2025	KBM	Review updated DIP objection	0.9
09/23/2025	MDG	Review and comment on DIP declaration and objection	1.0
09/23/2025	MDG	Review DIP comparables for DIP declaration	2.5
09/24/2025	CH	Analyze revised DIP comps analysis prepared by Moelis	1.6
09/24/2025	CH	Correspondence with W&C team re: DIP comps and deposition topics	0.7

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	CH	Draft outline of deposition topics and support	2.8
09/24/2025	JA	Review items per discovery documents re: historical transactions	1.3
09/24/2025	KBM	Review information related to DIP comps	0.4
09/24/2025	MDG	Review DIP comparables	1.5
09/24/2025	MDG	Review documents used in preparation of DIP comparables in preparation for D. MacGreevey deposition	1.0
09/24/2025	MDG	Review Moelis DIP comparables	1.5
09/25/2025	CH	Call with A. Chase (W&C) re: documents relied upon for D. MacGreevey deposition	0.3
09/25/2025	CH	Compile supporting documents for D. MacGreevey (AlixPartners) declaration	2.2
09/25/2025	CH	Continue telephonic attendance of Z. Jamal (Moelis) deposition	1.0
09/25/2025	CH	Continue to compile supporting documents for D. MacGreevey (AlixPartners) declaration	1.4
09/25/2025	CH	Correspondence with W&C team and D. MacGreevey (AlixPartners) re: DIP comps and upcoming depositions	0.8
09/25/2025	CH	Research and analysis re: plan value, equity value, and exit financing for comparable DIP facilities	1.2
09/25/2025	JA	Review comps used for DIP comparison	0.5
09/25/2025	MDG	Attend conclusion of Z. Jamal (Moelis) deposition	1.3
09/25/2025	MDG	Attend deposition of Z. Jamal (Moelis)	2.5
09/25/2025	MDG	Research DIP comparables mentioned in Z. Jamal (Moelis) deposition	1.0
09/26/2025	MDG	Review DIP comparables cited by Moelis in deposition	1.5
09/27/2025	CH	Correspondence with M. Gates and D. MacGreevey (both AlixPartners) re: DIP comps analysis	0.5
09/27/2025	DM	Review MacGreevey declaration and exhibits in support off UCC objection to ModivCare DIP to prepare for upcoming deposition	5.5
09/27/2025	MDG	Review DIP comparable issues list from D. MacGreevey	1.0
09/28/2025	CH	Call with M. Gates and C. Hood (AlixPartners) re: DIP comps	0.2
09/28/2025	CH	Draft updates to backstop fee analysis for comps	1.4
09/28/2025	CH	Preparation of support and research re: DIP fee comps	1.5
09/28/2025	CH	Review deposition transcript for Z. Jamal (Moelis) re: DIP financing	1.3
09/28/2025	DM	Prepare for deposition	1.5
09/28/2025	MDG	Review and comment on DIP comparables analysis	1.4
09/28/2025	MDG	Call with M. Gates and C. Hood (AlixPartners) re: DIP comps	0.2
09/29/2025	CH	Working session with D. MacGreevey, M. Gates (AlixPartners), and J. Zakia and others (W&C) re: prepare for D. MacGreevey deposition re: DIP objection	2.9
09/29/2025	CH	Discussion with D. MacGreevey, C. Hood (AlixPartners) re: ModivCare deposition post mortem and testimony preparation	1.0
09/29/2025	CH	Meeting with C. Shore and others (W&C) re: DIP hearing preparation	1.2
09/29/2025	CH	Working session with D. MacGreevey, M. Gates (AlixPartners), and J. Zakia and others (W&C) re: prepare for D. MacGreevey deposition re: DIP objection	2.9
09/29/2025	CH	Review Debtor and lender replies to DIP objection	1.2
09/29/2025	CC	Attend deposition of D. MacGreevey re: DIP objection	2.0
09/29/2025	DM	Attend MacGreevey ModivCare deposition	2.3

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/29/2025	DM	Discussion with D. MacGreevey, C. Hood (AlixPartners) re: ModivCare deposition post mortem and testimony preparation	1.0
09/29/2025	DM	Prepare for ModivCare MacGreevey deposition	5.3
09/29/2025	KBM	Review items related to DIP objection	0.9
09/29/2025	MDG	Attend D. MacGreevey DIP deposition	2.4
09/29/2025	MDG	Review DIP objection responses	1.2
09/30/2025	CH	Continue to prepare for DIP hearing with D. MacGreevey (AlixPartners), and J. Zakia and others (W&C)	2.7
09/30/2025	CH	Prepare for DIP hearing with D. MacGreevey (AlixPartners), and J. Zakia and others (W&C)	2.8
09/30/2025	DM	Attend D. MacGreevey testimony and DIP hearing preparation	6.0
09/30/2025	JA	Respond to requests for information and perform analysis for W&C re: DIP hearing	1.2
Total Professional Hours			**213.7**

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	38.3	$	55,918.00
Kathryn B McGlynn	$1,415	8.2		11,603.00
Johnny Lee	$1,225	1.4		1,715.00
Joel Amico	$1,150	23.5		27,025.00
Matthew D Gates	$1,120	33.4		37,408.00
Ryan Komendowski	$1,080	0.5		540.00
Thomas G Prince	$950	2.2		2,090.00
Christopher Cuomo	$910	13.9		12,649.00
Chase Hood	$850	92.3		78,455.00
Total Professional Hours and Fees		**213.7**	**$**	**227,403.00**

AlixPartners

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/12/2025	CH	Review accounts payable and proposed vendor program payment detail	1.3
09/12/2025	CH	Review professional fee forecast	0.6
09/12/2025	CH	Review variance reporting for week ending 8/24	0.6
09/12/2025	CH	Review variance reporting for week ending 8/30	0.7
09/15/2025	TGP	Analyze the Debtors' cash management interim order	0.2
09/15/2025	TGP	Analyze the Debtors' cash management motion	1.4
09/15/2025	TGP	Analyze the Debtors' DIP budget with respect to liquidity projections	2.6
09/15/2025	TGP	Analyze the Debtors' variance reporting through the week ended August 31	1.2
09/16/2025	CC	Research transportation expense for DIP budget	1.1
09/16/2025	JA	Review cash flow reporting and comparison to budget	0.5
09/16/2025	TGP	Analyze documents provided in data room	1.4
09/16/2025	TGP	Analyze the Debtors' liquidity projections	2.4
09/17/2025	CH	Analyze variance reporting package for week ended 9/7	0.7
09/17/2025	TGP	Analyze the Debtors' variance to budget through the period ended September 7	1.7
09/17/2025	TGP	Draft questions for FTI re: actual performance versus budget	0.3
09/18/2025	JA	Development of liquidity scenarios based on company provided cash flow and business plan projections	1.5
09/18/2025	TGP	Analyze the Debtors' weekly liquidity projections	1.4
09/19/2025	JA	Develop analysis to extend case timeline	1.5
09/21/2025	TGP	Analyze the Debtors' weekly liquidity projections	1.3
09/22/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	CC	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	CC	Research liquidity and cash flow related to contracts, transportation expense, minimum liquidity, and cash	1.7
09/22/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	JA	Analyze historical cash flow performance	0.9
09/22/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	TGP	Analyze the Debtors' DIP budget projections	1.7
09/22/2025	TGP	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/23/2025	CC	Continue analysis of DIP budget and extension of case scenario	2.4
09/23/2025	CC	Participate in a call with J. Amico and C. Cuomo (AlixPartners) re: review of DIP budget extension model	0.5
09/23/2025	JA	Participate in a call with J. Amico and C. Cuomo (AlixPartners) re: review of DIP budget extension model	0.5
09/23/2025	TGP	Analyze the Debtors' DIP budget projections	1.1
09/24/2025	CH	Review liquidity and variance reporting package for week ended 9/14	0.8
09/24/2025	CC	Call with C. Cuomo, T. Prince (AlixPartners) re: liquidity analysis	0.2
09/24/2025	CC	Update weekly variance update deck in advance of committee meeting	2.8
09/24/2025	TGP	Analyze changes to the DIP budget over time	1.3
09/24/2025	TGP	Analyze the Debtors' variance report for the week ended September 14th	0.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	TGP	Call with C. Cuomo, T. Prince (AlixPartners) re: liquidity analysis	0.2
09/25/2025	CC	Finalize weekly variance update deck in advance of Committee meeting	0.6
09/25/2025	TGP	Analyze the Debtors' DIP budget projections	1.2
09/26/2025	JA	Analyze liquidity scenarios under assumptions	1.0
09/27/2025	CC	Edit and review liquidity analysis files for preparation before sending to W&C	0.6
09/27/2025	CC	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/27/2025	CC	Respond to questions from D. MacGreevey of AlixPartners related to liquidity and revolver	1.4
09/27/2025	DM	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/27/2025	JA	Analyze liquidity scenarios and prepare summary output	1.0
09/27/2025	JA	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/29/2025	JA	Analyze cash variance reports and prepare diligence questions	0.5
09/29/2025	JA	Prepare cash flow scenario schedules	0.7
09/29/2025	TGP	Analyze the Debtors' variance report for the period ended September 21st	0.8
09/30/2025	CC	Respond to question from J. Amico (AlixPartners) re: contracts	0.2
09/30/2025	TGP	Analyze variance report for week ended September 21st	0.4
Total Professional Hours			**52.0**

AlixPartners

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Joel Amico	$1,150	9.8		11,270.00
Thomas G Prince	$950	21.9		20,805.00
Christopher Cuomo	$910	13.2		12,012.00
Chase Hood	$850	5.4		4,590.00
Total Professional Hours and Fees		**52.0**	**$**	**51,159.00**

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	TGP	Analyze the Debtors' operating model with projections through 2026	0.8
09/17/2025	AP	Review files uploaded to the data room by Debtors to identify relevant files supporting Debtors' financial projections	1.5
09/17/2025	TGP	Analyze the Debtors' operating model with projections through 2026	1.1
09/18/2025	AP	Analyze Debtors' financial projections and supporting documents for NEMT with a focus on revenue, rate and volume trends, and customer contracts	2.4
09/18/2025	JA	Review underlying financial model and prepare diligence questions	1.1
09/18/2025	TGP	Analyze the Debtors' operating model	1.6
09/19/2025	GM	Call with J Wang, G Magrisi (AlixPartners) re: business plan assessment document review and planning	0.4
09/19/2025	JW	Call with J Wang, G Magrisi (AlixPartners) re: business plan assessment document review and planning	0.4
09/19/2025	JA	Review business plan and develop issues for diligence call with company	1.5
09/19/2025	JL	Review preliminary information on business plan and note follow up items	0.6
09/19/2025	TGP	Analyze the Debtors' 2026 projections	1.6
09/22/2025	AP	Analyze Debtors' financial projections and supporting documents for NEMT with a focus on expenses, including service costs	2.8
09/22/2025	AP	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	AP	Review Debtors' purchased services schedule for NEMT with a focus on vendor and third party provider costs	2.6
09/22/2025	CH	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	CC	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	GM	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	JW	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	LL	Reviewed and annotated internal management memorandums re: current operating model, business challenges, and go-forward assumptions, formulated initial working hypotheses	1.2
09/22/2025	LL	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/23/2025	AP	Analyze Debtors' financial projections and supporting documents for PCS with a focus on expenses, including service costs	2.8
09/23/2025	AP	Analyze Debtors' financial projections and supporting documents for PCS with a focus on revenue, hours and rate trends, customer contracts	2.5
09/23/2025	AP	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	AP	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	DM	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3

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Re: Business and Strategic Plan
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/23/2025	GM	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	GM	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	GM	Participate in a call with G. Magrisi, S Clark (AlixPartners) re: business plan workstreams and project plan	0.4
09/23/2025	JW	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	JW	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	LL	Review historical profit & loss statements provided by management; identified revenue/cost trends, normalized adjustments, and areas requiring clarification	2.4
09/23/2025	LL	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	SC	Participate in a call with G. Magrisi, S Clark (AlixPartners) re: business plan workstreams and project plan	0.4
09/24/2025	AP	Analyze Debtors' financial projections and supporting documents for RPM with a focus on expenses, including service costs	2.6
09/24/2025	AP	Analyze Debtors' financial projections and supporting documents for RPM with a focus on revenue, hours and rate trends, customer contracts	2.7
09/24/2025	AP	Develop customer contract revenue waterfall with key volume and rate metrics for NEMT business	2.4
09/24/2025	SC	Prepare high-level view functional distribution of headcount for business plan workstream.	1.7
09/24/2025	SC	Review client financial documents and organizational charts for business plan workstream.	0.9
09/24/2025	TGP	Analyze the Debtors' business plan model	2.3
09/25/2025	AP	Develop customer contract revenue waterfall with key volume and rate metrics for NEMT business	2.8
09/25/2025	AP	Develop project plan and time line with key milestones for Debtors' business plan review	1.5
09/25/2025	AP	Prepare key revenue and cost drivers for ModivCare businesses to pressure test Debtors' financial projections	2.7
09/25/2025	LL	Prepare questionnaire for management re: assumptions for financial projections, performance improvement initiatives and cost-out programs.	1.6
09/25/2025	SC	Analyze materials received from Debtors for business plan workstream.	0.6
09/25/2025	TGP	Analyze the Debtors' business plan model	2.9
09/26/2025	AP	Analyze customer contract revenue waterfall with key volume and rate metrics for NEMT business for the top 20 contracts	2.7
09/26/2025	AP	Compile key questions for Debtors' management and data requests on the Debtors' latest financial projections and FY26-30 business plan	2.1
09/26/2025	AP	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6

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Re: Business and Strategic Plan
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/26/2025	AP	Review Debtors' latest financial projections re: business plan and valuation disclosure filed on 9/23	2.5
09/26/2025	GM	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	JW	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	JL	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	LL	Update data request form to include additional business plan requests and flagged critical items for prioritization by Management	1.2
09/26/2025	LL	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	RK	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	RK	Review latest business plan produced and corresponding assumptions.	2.4
09/26/2025	SC	Prepare materials in relation to business plan workstream, specifically around data requirements and questions for management.	0.6
09/26/2025	TGP	Analyze investment banker fees in comparable cases	2.7
09/26/2025	TGP	Analyze the Debtors' business plan model	1.3
09/29/2025	AP	Analyze customer contract attrition and revenue impacts for NEMT business for the top 20 contracts	2.3
09/29/2025	AP	Analyze Segment level projections in the Debtors' business plan and valuation disclosure filed on 9/23	2.8
09/29/2025	LL	Preparation of financial models by business unit (NEMT, PCS, RPM/Higi) with variance analysis	1.8
09/29/2025	SC	Analyze documents received from Debtors re: on going cost savings initiatives to weave into hypotheses for business plan workstream	1.4
09/29/2025	SC	Analyze financial data, including understanding historical trends and future projections, provided by Debtors and SEC filings for business plan workstream	2.8
09/29/2025	SC	Analyze staffing / organization related documents provided by Debtors to create questions and hypotheses for business plan workstream	2.3
09/29/2025	SC	Review financial data, including understanding historical trends and future projections, provided by Debtors and SEC filings for business plan workstream	1.7
09/29/2025	TGP	Analyze the Debtors' 2026 projections	1.3
09/29/2025	TGP	Research the Debtors' cleansing materials filed in 2025	1.1
09/30/2025	AP	Analyze customer contract attrition and revenue impacts for PCS business for the top 20 contracts	2.6
09/30/2025	AP	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	AP	Prepare summary of information requests to discuss with Debtors' financial advisor in support of FY26-30 business plan	1.9
09/30/2025	AP	Research market and growth outlook for each segment re: Debtors' business plan projections filed on 9/23	2.7
09/30/2025	LL	Analyze historical (2022-2024) and projections (2025-2030) for service expense across business units and assessment of cost improvement levers	2.4
09/30/2025	LL	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
09/30/2025	SC	Analyze historical and future looking cost data for business plan workstream	2.6
09/30/2025	SC	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
09/30/2025	SC	Create materials visualizing trends in historical and future looking costs and revenue for business plan workstream	2.9
09/30/2025	SC	Review materials visualizing trends in historical and future looking costs and revenue for business plan workstream	2.3
09/30/2025	TGP	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
Total Professional Hours			**115.6**

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Greg Magrisi	$1,250	2.9		3,625.00
Jerry Wang	$1,225	2.5		3,062.50
Johnny Lee	$1,225	1.2		1,470.00
Ashutosh Panda	$1,150	51.4		59,110.00
Joel Amico	$1,150	2.6		2,990.00
Ryan Komendowski	$1,080	3.0		3,240.00
Thomas G Prince	$950	17.1		16,245.00
Christopher Cuomo	$910	0.6		546.00
Susan Clark	$910	20.6		18,746.00
Chase Hood	$850	0.6		510.00
Lucas Lovatto	$835	12.8		10,688.00
Total Professional Hours and Fees		**115.6**	**$**	**120,670.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	TGP	Analyze documents from the Debtors provided through discovery with respect to retention programs	0.8
09/21/2025	TGP	Analyze Moelis retention application	1.4
09/22/2025	MDG	Review analysis of Moelis fees	0.7
09/22/2025	TGP	Analyze Moelis fee structure	1.2
09/23/2025	TGP	Analyze Moelis fee structure	0.9
09/23/2025	TGP	Review FTI retention application	0.4
09/23/2025	TGP	Review Moelis retention application	0.4
09/24/2025	MDG	Call with M. Gates, T. Prince (AlixPartners) re: analysis of retention applications for Moelis and FTI	0.2
09/24/2025	TGP	Call with M. Gates, T. Prince (AlixPartners) re: analysis of retention applications for Moelis and FTI	0.2
09/25/2025	TGP	Analyze FTI's retention application	1.1
09/25/2025	TGP	Review data room documents with respect to the Debtors' business plan	2.7
09/29/2025	TGP	Analyze success fees in comparable cases	2.8
09/30/2025	MDG	Review analysis of Debtors' professional fees	0.8
09/30/2025	TGP	Analyze investment banking fees in comparable cases	1.4
09/30/2025	TGP	Analyze success fees in comparable cases	1.1
Total Professional Hours			**16.1**

AlixPartners

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Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

PROFESSIONAL	RATE	HOURS	FEES
Matthew D Gates	$1,120	1.7	1,904.00
Thomas G Prince	$950	14.4	13,680.00
Total Professional Hours and Fees		**16.1**	**$ 15,584.00**

AlixPartners

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Review first day declaration re: company and case background	1.6
09/10/2025	JA	Review background information and first day filings	1.7
09/10/2025	TGP	Analyze the Debtors' 2024 10-K	1.2
09/10/2025	TGP	Analyze the Debtors' first day declaration	1.7
09/11/2025	CH	Download data room documents to internal site for team	1.1
09/11/2025	CH	Initial review of data room document uploads	1.4
09/11/2025	CC	Create and edit due diligence request list across 13 week cash flow, DIP, M&A, investigation and other categories	2.6
09/11/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: organize due diligence request list	0.3
09/11/2025	JA	Draft intro due diligence questions	1.5
09/11/2025	JA	Review key legal issues based on Akin input	0.7
09/11/2025	JL	Review initial request list	0.6
09/11/2025	JL	Review case filings to prepare for kick off	0.6
09/11/2025	MDG	Review initial due diligence material provided	2.4
09/11/2025	TGP	Analyze documents provided in care package from the Debtors	2.6
09/11/2025	TGP	Analyze the Debtors' first day declaration	1.1
09/11/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: organize due diligence request list	0.3
09/11/2025	TGP	Review discovery notices in connection with creation of initial diligence request list	0.6
09/11/2025	TGP	Update diligence list with initial diligence requests	1.4
09/11/2025	TGP	Update initial diligence request list with additional requests	0.6
09/12/2025	CC	Make additional updates to due diligence request re: business plan and formatting	2.3
09/12/2025	DM	Review revised ModivCare diligence tracker	0.5
09/12/2025	DM	Revise draft ModivCare diligence tracker	0.8
09/12/2025	JA	Review background information and update to due diligence list	1.6
09/12/2025	JA	Review historical financial filings and disclosures	1.0
09/12/2025	MDG	Further review of due diligence material provided	0.8
09/12/2025	MDG	Review due diligence list and provide comments	1.0
09/12/2025	TGP	Analyze the Debtors' first day declaration	1.3
09/12/2025	TGP	Review documents provided by the Debtors in connection with initial diligence requests	1.2
09/13/2025	DM	Review and revise the ModivCare diligence tracker	0.5
09/15/2025	CH	Download and review new uploads to data room	1.2
09/15/2025	CC	Prepare indexing for data room downloads	0.8
09/15/2025	CC	Update due diligence tracker for data received	0.4
09/15/2025	JA	Update to due diligence list based on data room files	0.5
09/15/2025	KBM	Review information available in data room	0.3
09/15/2025	KBM	Review information re: CMS receivables	0.4
09/15/2025	MDG	Review data room provided by Debtors	2.5
09/16/2025	CH	Research 10-K filings re: CMS and government receivables	0.6
09/16/2025	CC	Draft email to D. MacGreevey (AlixPartners) summarizing key terms of critical vendor motion	0.6
09/16/2025	CC	Review 10-K and earnings transcript for general business and financial trends	0.6

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	DM	Email with attachments with internal counsel re: ModivCare NDA	0.3
09/16/2025	JA	Review company public disclosures and analysis of prior transactions	1.5
09/16/2025	KBM	Review draft revisions to critical vendor order	0.8
09/16/2025	KBM	Review information related to unencumbered assets and related value	0.4
09/16/2025	MDG	Review W&C document re: unencumbered assets	1.5
09/17/2025	DM	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	DM	Review ModivCare 10-K re: CMS exposure	0.7
09/17/2025	JA	Review data room and update diligence list for revised cash forecast requests	1.0
09/17/2025	JA	Review documents from W&C discovery request	1.2
09/17/2025	JL	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	KBM	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	MDG	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	MDG	Research Debtors' New Jersey contracts and RFP	0.4
09/17/2025	MDG	Research unencumbered assets	0.8
09/17/2025	TGP	Analyze collateral package for the Debtors' prepetition debt	1.4
09/17/2025	TGP	Analyze the Debtors' interest in the Matrix JV	1.3
09/17/2025	TGP	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	TGP	Review comments to the Debtors' proposed final cash management order	0.4
09/18/2025	CH	Continue review of Relativity document production for documents relative to DIP and liquidity workstreams	2.6
09/18/2025	CH	Review Relativity document production for documents relative to DIP and liquidity workstreams	2.7
09/18/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: data room documents	0.3
09/18/2025	CC	Review files in data room disclosure for case analysis	2.4
09/18/2025	KBM	Review revised critical vendor motion	0.6
09/18/2025	TGP	Analyze documents from the Debtors provided through discovery with respect board materials	1.2
09/18/2025	TGP	Analyze the Debtors' collateral package for prepetition debt	0.9
09/18/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: data room documents	0.3
09/19/2025	CC	Begin analysis of SOFAs and SOALs	2.3
09/19/2025	CC	Continue analysis of SOFAs and SOALs re: payments and assets	2.9
09/19/2025	CC	Call with C. Cuomo and M. Gates (AlixPartners) re: SOFA/SOAL presentation	0.2
09/19/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: review of diligence tracker and discovery	0.5
09/19/2025	CC	Research comparable companies for valuation	1.1
09/19/2025	CC	Review discovery files and organize associated diligence tracker	0.9
09/19/2025	JA	Analyze customer contracts and corresponding payment timing to develop go forward liquidity view	1.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/19/2025	MDG	Call with C. Cuomo and M. Gates (AlixPartners) re: SOFA/SOAL presentation	0.2
09/19/2025	MDG	Begin presentation on SOFAs and SOALs	0.4
09/19/2025	MDG	Review due diligence request list	0.5
09/19/2025	TGP	Analyze the Debtors' interest in the Matrix JV	1.4
09/19/2025	TGP	Analyze the Debtors' schedules of assets and liabilities	1.1
09/19/2025	TGP	Analyze the Debtors' statements of financial affairs	0.9
09/19/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: review of diligence tracker and discovery	0.5
09/19/2025	TGP	Review documents provided by the Debtors in comparison to diligence requests	0.8
09/19/2025	TGP	Update diligence request list	0.6
09/20/2025	CC	Continue analysis of SOFAs and SOALs re: assets by debtor	2.6
09/20/2025	CC	Prepare analysis of SOFAs and SOALs re: liabilities and claims	1.4
09/21/2025	MDG	Research information on unencumbered assets in SOALs	2.5
09/22/2025	CH	Review new items uploaded to virtual data room	0.6
09/22/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: analyze SOFA/SOALs payments and assets	0.7
09/22/2025	KBM	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	KBM	Review analysis of unencumbered assets and related value	0.6
09/22/2025	MDG	Continue unencumbered assets analysis	1.3
09/22/2025	MDG	Review diligence list for unencumbered assets requests	0.8
09/22/2025	TGP	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	TGP	Analyze the Debtors' historical financials	1.6
09/22/2025	TGP	Analyze the Debtors' joint venture interests	1.6
09/22/2025	TGP	Analyze the Debtors' reported assets	1.4
09/22/2025	TGP	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: analyze SOFA/SOALs payments and assets	0.7
09/23/2025	JA	Analyze underlying financial projection detail to evaluate supporting assumptions	0.8
09/23/2025	JA	Review data room and analysis of documents	0.5
09/23/2025	TGP	Analyze the Debtors' schedules of assets and liabilities	1.9
09/23/2025	TGP	Analyze the Debtors' statements of financial affairs	2.4
09/23/2025	TGP	Draft questions for FTI re: the SOFAs and SOALs	0.4
09/23/2025	TGP	Review documents uploaded to the data room in response to diligence requests	0.8
09/23/2025	TGP	Update diligence tracker based on documents uploaded to the data room	0.4
09/24/2025	CC	Respond to question from D. MacGreevey of AlixPartners related to letters of credit and net debt	0.3
09/24/2025	KBM	Review outstanding information requests	0.4
09/24/2025	TGP	Analyze the Debtors' SOALs	1.2
09/24/2025	TGP	Analyze the Debtors' SOFAs	1.1
09/25/2025	CC	Download documentation related to comparables and DIP budget extension to be shared with W&C	0.8
09/25/2025	JA	Review capital structure assumptions in Plan and reconcile with Plan documents	1.0

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Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	JA	Review discovery requests and prepare responses	0.7
09/25/2025	JA	Review sets of financial projections and reconcile of changes	1.2
09/25/2025	TGP	Analyze the Debtors' historical financials	1.3
09/26/2025	CH	Review financial model and related assumptions re: go-forward business plan	2.1
09/26/2025	CC	Respond to questions associated with information request list and document production	0.3
09/26/2025	JA	Review data room documents related to financial projections support and draft diligence questions	1.0
09/26/2025	JA	Review documents produced by Debtors and prepare follow up questions	1.5
09/26/2025	KBM	Review 2025-2030 financial projections	1.1
09/26/2025	MDG	Continue unencumbered assets analysis	1.5
09/27/2025	JA	Preparation of materials for deposition prep	1.5
09/27/2025	MDG	Update and send diligence list to FTI	0.4
09/28/2025	JA	Prepare summary financial information for W&C	0.5
09/29/2025	JA	Analyze certain prepetition vendor payment status and prepare analysis	0.8
09/29/2025	JA	Analyze historical cash projections and changes over time	0.8
09/29/2025	JA	Prepare financial analyses for W&C background	1.5
09/29/2025	KBM	Revise SOFA/Schedules presentation for the Committee	0.8
09/29/2025	MDG	Research 8-K filings for prior financial projections	0.8
09/29/2025	TGP	Analyze the Debtors' historical financials	1.3
09/30/2025	AP	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	GM	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JW	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JA	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JA	Review data room and perform update of diligence list for required information	1.3
09/30/2025	JL	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	KBM	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	KBM	Finalize SOFA/Schedules presentation to the Committee	0.3
09/30/2025	LL	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	MDG	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	MDG	Prepare analysis of unencumbered assets	1.5
09/30/2025	RK	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	SC	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	TGP	Analyze the Debtors' historical financials	1.1
09/30/2025	TGP	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
Total Professional Hours			**140.0**

AlixPartners

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.3	$	4,818.00
Kathryn B McGlynn	$1,415	6.9		9,763.50
Greg Magrisi	$1,250	0.4		500.00
Jerry Wang	$1,225	0.4		490.00
Johnny Lee	$1,225	2.1		2,572.50
Ashutosh Panda	$1,150	0.4		460.00
Joel Amico	$1,150	25.4		29,210.00
Matthew D Gates	$1,120	20.2		22,624.00
Ryan Komendowski	$1,080	0.4		432.00
Thomas G Prince	$950	41.5		39,425.00
Christopher Cuomo	$910	24.3		22,113.00
Susan Clark	$910	0.4		364.00
Chase Hood	$850	13.9		11,815.00
Lucas Lovatto	$835	0.4		334.00
Total Professional Hours and Fees		**140.0**	**$**	**144,921.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CC	Compare critical vendor motion and interim order to precedent cases to establish appropriate modification requests	0.7
09/10/2025	CC	Review critical vendor motion and interim order	0.4
09/10/2025	JA	Review cash first day motion and declaration materials to prepare issues list	1.0
09/10/2025	MDG	Review first day motions and prepare issues lists	2.5
09/10/2025	TGP	Analyze the Debtors' cash management motion	0.6
09/10/2025	TGP	Create issues list re: the Debtors' cash management motion	0.4
09/11/2025	KBM	Review issues related to cash management and critical vendor motions	0.9
09/11/2025	MDG	Finalize and send list of issues with cash management motion to D. MacGreevey	0.4
09/12/2025	TGP	Analyze the Debtors' cash management motion in comparison to other cases	0.9
09/12/2025	TGP	Analyze the Debtors' cash management motion noticing and reporting terms	0.6
09/12/2025	TGP	Analyze the Debtors' motion to pay prepetition claims	0.4
09/15/2025	CH	Review and summarize procedural first day motions	0.7
09/15/2025	CH	Review and summarize taxes and fees motion	0.9
09/15/2025	CH	Review and summarize trading procedures and net operating losses motion	0.6
09/15/2025	CH	Review and summarize utilities motion	0.7
09/15/2025	JA	Review and provide comments on first day motion and prep for upcoming FTI call	1.1
09/15/2025	MDG	Review first day motions	2.5
09/15/2025	TGP	Analyze the Debtors' customer programs motion	1.1
09/15/2025	TGP	Analyze the Debtors' insurance motion	0.8
09/15/2025	TGP	Analyze the Debtors' wages motion	1.3
09/16/2025	DM	Call with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor program analysis	0.3
09/16/2025	DM	Review email from C. Cuomo (AlixPartners) re: cross reference of our ModivCare trade vendor motion issues list to W&C markup	0.3
09/16/2025	DM	Review W&C comments to final ModivCare trade vendor order	0.3
09/16/2025	JA	Call with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor program analysis	0.3
09/16/2025	MDG	Review and provide comments to W&C on critical vendor motion	0.5
09/16/2025	MDG	Review W&C markup of cash management motion	0.7
09/18/2025	JA	Diligence on revised vendor motion and draft of issues list	1.0
09/18/2025	MDG	Review updated draft of cash management motion	0.3
09/22/2025	CH	Review lease rejection motion in relation to lease claims analysis	0.8
09/22/2025	CH	Review Moelis retention application re: DIP financing related fees	0.4
09/22/2025	CH	Review ordinary course professionals motion	0.3
09/24/2025	JA	Preparation of supporting details for depositions	0.9
09/24/2025	KBM	Review updates to Cash Management order	0.6
09/24/2025	MDG	Review updates to cash management motion	0.5
09/25/2025	MDG	Email to D. MacGreevey and K. McGlynn re: intercompany transfers and cash management motion	0.2
09/26/2025	JA	Attend deposition of Chad Shandler (FTI)	2.0
09/26/2025	JL	Participate and listen in on C. Shandler (FTI) Deposition	2.1
Total Professional Hours			**30.0**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Kathryn B McGlynn	$1,415	1.5		2,122.50
Johnny Lee	$1,225	2.1		2,572.50
Joel Amico	$1,150	6.3		7,245.00
Matthew D Gates	$1,120	7.6		8,512.00
Thomas G Prince	$950	6.1		5,795.00
Christopher Cuomo	$910	1.1		1,001.00
Chase Hood	$850	4.4		3,740.00
Total Professional Hours and Fees		**30.0**	**$**	**32,302.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	CH	Review general unsecured and lease claim analysis prepared by Debtors	0.9
Total Professional Hours			**0.9**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Chase Hood	$850	0.9	$	765.00
Total Professional Hours and Fees		**0.9**	**$**	**765.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	MR	Research ModivCare business segments for guideline company analysis.	1.7
09/10/2025	RK	Review case materials for background research and valuation ramp.	1.5
09/11/2025	JM	Assess uptier transaction.	1.4
09/11/2025	JM	Review First Day Declaration.	2.1
09/11/2025	JM	Review ModivCare's 2024 10-K.	0.6
09/11/2025	MB	Conduct valuation analysis	0.6
09/11/2025	MR	Analyze guideline companies for ModivCare valuation analysis.	1.8
09/11/2025	RK	Research ModivCare comparable company for valuation.	2.8
09/11/2025	RK	Research ModivCare comparable company payer mix for valuation.	2.6
09/12/2025	JM	Assess ModivCare's capital structure.	1.8
09/12/2025	JM	Review analyst reports.	0.7
09/12/2025	JM	Search Capital IQ for historical medical transport transactions.	2.5
09/12/2025	MB	Review data request list	0.3
09/12/2025	MR	Analyze guideline company financial metrics for ModivCare valuation analysis.	2.7
09/12/2025	MR	Review ModivCare analyst reports for guideline company analysis.	2.0
09/12/2025	RK	Research guideline company transactions for valuation analysis.	0.9
09/12/2025	RK	Review disclosure statement for case background.	2.1
09/12/2025	RK	Review documents provided by counsel for valuation analysis.	3.0
09/15/2025	JM	Search Capital IQ for historical medical transport transactions.	1.4
09/15/2025	JM	Search Capital IQ for historical personal care transactions.	2.8
09/15/2025	JM	Update valuation analysis.	1.7
09/15/2025	MB	Conducted valuation research	0.8
09/15/2025	MR	Develop guideline company method for ModivCare valuation.	2.0
09/15/2025	MR	Review EBITDA forecast from data room for ModivCare valuation analysis.	1.9
09/16/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare Allston workstream	0.2
09/16/2025	DM	Email to M. Brown, J. Kopa and M. Rule (AlixPartners) re: valuation workstream	0.3
09/16/2025	JM	Review S&P credit rating reports.	1.6
09/16/2025	JM	Search Capital IQ for historical personal care transactions.	1.0
09/16/2025	MB	Conducted valuation analysis	0.3
09/16/2025	MR	Research ModivCare segment financial performance for guideline company valuation analysis.	2.1
09/16/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare Allston workstream	0.2
09/17/2025	DM	Review and distribute CVs for proposed ModivCare valuation expert candidates to W&C team	0.6
09/17/2025	JM	Update valuation analysis.	2.8
09/17/2025	MR	Perform analysis of monitoring segment guideline companies for ModivCare valuation analysis.	2.8
09/17/2025	MR	Prepare guideline transaction analysis for ModivCare valuation.	2.2
09/17/2025	RK	Preparation of AMCI valuation analysis.	1.4
09/17/2025	RK	Review guideline company comparables for valuation analysis.	2.0
09/18/2025	JM	Review Board of Directors meeting materials.	0.7
09/18/2025	JM	Review FTI cash flow projections.	1.7

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	MR	Review Matrix segment financial information in ModivCare public filings.	2.9
09/18/2025	RK	Review documents produced for AMCI valuation analysis.	2.3
09/19/2025	CC	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	JM	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	JM	Review Board of Directors meeting materials.	3.0
09/19/2025	JM	Review ModivCare advisor presentations.	2.6
09/19/2025	JM	Update valuation analysis.	1.4
09/19/2025	MR	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	MR	Perform research re: health care industry companies for market approach analysis.	1.0
09/19/2025	MR	Review guideline company analyst reports for ModivCare valuation analysis.	2.1
09/19/2025	RK	Review current business plan produced for AMCI valuation analysis.	2.0
09/19/2025	TGP	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/20/2025	DM	Review analysis of ModivCare post emergence equity dilution	0.4
09/22/2025	MR	Perform analysis of ModivCare capital structure for valuation analysis.	0.8
09/22/2025	RK	Review documents produced for AMCI valuation analysis.	1.8
09/23/2025	MR	Perform analysis of ModivCare capital structure for valuation analysis.	0.4
09/23/2025	RK	Preparation of AMCI valuation analysis.	2.8
09/24/2025	RK	Review document production for business plans.	2.3
09/25/2025	RK	Preparation of AMCI valuation analysis.	0.8
09/25/2025	RK	Review historical board meeting materials from document production for projection analysis.	2.6
09/29/2025	JM	Draft valuation report.	3.0
09/29/2025	JM	Review advisor presentations.	1.7
09/29/2025	JM	Update valuation analysis	2.6
09/29/2025	MR	Prepare draft presentation materials for ModivCare valuation analysis.	2.3
09/29/2025	RK	Review documents produced for business plan review.	2.0
09/30/2025	JM	Draft valuation report.	3.0
09/30/2025	JM	Review analyst reports.	1.3
09/30/2025	JM	Update valuation analysis.	2.4
09/30/2025	MR	Analyze financial metrics for guideline companies for ModivCare valuation analysis.	2.1
09/30/2025	MR	Analyze market data for guideline companies for ModivCare valuation analysis.	1.5
09/30/2025	MR	Perform segment analysis of ModivCare guideline companies for valuation analysis.	3.0
09/30/2025	RK	Review documents produced for valuation analysis.	1.3
Total Professional Hours			**118.6**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Marc Brown	$1,415	2.0		2,830.00
Ryan Komendowski	$1,080	34.4		37,152.00
Matthew Root	$1,000	35.7		35,700.00
Thomas G Prince	$950	0.4		380.00
Christopher Cuomo	$910	0.4		364.00
Jyoji Morimoto	$910	44.2		40,222.00
Total Professional Hours and Fees		**118.6**	**$**	**118,838.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	TGP	Analyze the Debtors' RSA with respect to treatment of creditors	1.6
09/11/2025	CH	Review plan and disclosure statement re: exit financing and claim recovery mechanics	1.8
09/12/2025	TGP	Analyze the Debtors' RSA	0.8
09/12/2025	TGP	Analyze the Debtors' RSA term sheet	0.6
09/24/2025	CH	Analyze filed financial projections and valuation and related assumptions	1.1
09/24/2025	CH	Analyze filed liquidation analysis and related assumptions	0.9
09/24/2025	DM	Review filed ModivCare disclosure statement exhibits and memo to team re: diligence of same	1.2
09/24/2025	DM	Prepare memorandum to AlixPartners' internal team re: ModviCare disclosure statement exhibits and diligence of same	0.5
09/24/2025	JA	Review Disclosure Statement filed exhibits and prepare diligence questions	1.5
09/24/2025	MDG	Review disclosure statement exhibits	1.4
09/26/2025	KBM	Review initial settlement offer	0.3
09/30/2025	MDG	Review disclosure statement objection	0.8
Total Professional Hours			**12.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Kathryn B McGlynn	$1,415	0.3		424.50
Joel Amico	$1,150	1.5		1,725.00
Matthew D Gates	$1,120	2.2		2,464.00
Thomas G Prince	$950	3.0		2,850.00
Chase Hood	$850	3.8		3,230.00
Total Professional Hours and Fees		**12.5**	**$**	**13,175.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	DM	Attend hearing re: ModivCare trade vendor payment motion	0.5
09/18/2025	KBM	Attend hearing re: critical vendor motion	0.4
09/25/2025	CH	Telephonic attendance of Z. Jamal (Moelis) deposition	2.9
09/26/2025	CC	Attend deposition of C. Shandler (FTI) re: extension of budget	1.9
09/29/2025	CH	Attend deposition of D. MacGreevey (AlixPartners) re: DIP objection	1.8
09/29/2025	JA	Attend MacGreevey deposition	2.2
09/30/2025	CH	Attend hearing re: DIP objection	1.5
09/30/2025	CH	Continue to attend hearing re: DIP objection	2.0
09/30/2025	CH	Attend ModivCare DIP hearing breakout meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, L. Miranda (W&C), D. MacGreevey and C. Hood (AlixPartners) re: DIP objection	2.0
09/30/2025	DM	Attend ModivCare DIP hearing	3.5
09/30/2025	DM	Attend ModivCare DIP hearing breakout meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, L. Miranda (W&C), D. MacGreevey and C. Hood (AlixPartners) re: DIP objection	2.0
09/30/2025	JA	Attend DIP hearing	3.0
09/30/2025	KBM	Attend DIP hearing	3.5
09/30/2025	MDG	Attend continued DIP hearing	1.6
09/30/2025	MDG	Attend DIP hearing	1.6
Total Professional Hours			**30.4**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.0	$	8,760.00
Kathryn B McGlynn	$1,415	3.9		5,518.50
Joel Amico	$1,150	5.2		5,980.00
Matthew D Gates	$1,120	3.2		3,584.00
Christopher Cuomo	$910	1.9		1,729.00
Chase Hood	$850	10.2		8,670.00
Total Professional Hours and Fees		**30.4**	**$**	**34,241.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/11/2025	BF	Draft engagement letter	1.1
09/11/2025	BF	Draft AlixPartners retention documents	2.1
09/11/2025	DM	Begin review ModivCare retention package	0.6
09/11/2025	DM	Continue review of draft ModivCare retention package	0.8
09/11/2025	SH	Review ModiveCare UCC retention documents	0.4
09/16/2025	KSM	Correspondence with D. MacGreevey and S. Rosenfeld (AlixPartners), D. Litz (W&C) re: retention	0.2
09/17/2025	JB	Prepare parties in interest list for firm database	1.2
09/17/2025	JB	Review parties in interest list for disclosure purposes	0.8
09/18/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Car-Iron	1.8
09/18/2025	JB	Draft disclosures to be included in retention documents for parties beginning with 111-Cap	1.6
09/19/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Nati-Ros	1.9
09/19/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Ive-Nat	1.7
09/22/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Tru-Ze	1.4
09/22/2025	JB	Draft disclosures to be included in retention documents for parties beginning with RSU-Tri	1.6
09/22/2025	KSM	Correspondence with J. Braverman (AlixPartners) re: relationship disclosures	0.2
09/23/2025	JB	Update draft disclosures to be included in retention documents in response to comments from K. Sundt McClarren (AlixPartners)	0.6
09/23/2025	KSM	Edit draft relationship disclosures	1.2
09/23/2025	KSM	Revise draft AlixPartners' retention documents	0.6
09/26/2025	JB	Compare updated parties in interest list to previous version for disclosure purposes	1.1
09/26/2025	JB	Draft disclosures to be included in retention documents for parties beginning with 1A-Bi	1.7
09/26/2025	JB	Prepare list for firm database with additional parties in interest	2.4
09/26/2025	SH	Correspondence re: discovery requests with J. Amico and S. Rosenfeld (AlixPartners)	0.4
09/29/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Del-Ind	1.6
09/29/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Bin-Deb	1.8
09/30/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Pac-Ver	2.9
09/30/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Ind-Orl	1.9
Total Professional Hours			**33.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.4	$	2,044.00
Kaitlyn Sundt McClarren	$715	2.2		1,573.00
Sari Hammer	$660	0.8		528.00
Brooke Filler	$605	3.2		1,936.00
Jennifer Braverman	$565	26.0		14,690.00
Total Professional Hours and Fees		**33.6**	**$**	**20,771.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Discovery
Code: 20015424PA0001.1.21

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	CH	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	DM	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	JA	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	MDG	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	MDG	Produce documents in response to discovery request	0.3
Total Professional Hours			**2.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Discovery
Code: 20015424PA0001.1.21

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Joel Amico	$1,150	0.5		575.00
Matthew D Gates	$1,120	0.8		896.00
Chase Hood	$850	0.5		425.00
Total Professional Hours and Fees		**2.3**	**$**	**2,626.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/29/2025	CH	Travel from Lufkin, TX to Houston, TX (for D. MacGreevey deposition preparation)	2.0
09/29/2025	DM	Travel from New York, NY to W&C Houston, TX (to attend ModivCare deposition and DIP hearing)	6.0
09/30/2025	CH	Travel from Houston, TX to Lufkin, TX (return from DIP hearing)	3.0
Total Professional Hours			**11.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.0	$	8,760.00
Chase Hood	$850	5.0		4,250.00
Total Professional Hours and Fees		**11.0**	**$**	**13,010.00**
Less 50% Travel Fees				(6,505.00)
Total Professional Fees			**$**	**6,505.00**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
09/25/2025	Airfare David MacGreevey 2025-09-29 LGA- IAH	340.49
09/27/2025	Taxi/Car Service David MacGreevey Home to LGA airport	144.94
09/29/2025	Taxi/Car Service David MacGreevey Iah airport to Client office	119.47
09/29/2025	Roundtrip mileage from Home to White & Case Houston office. Mileage Chase Hood 235 Miles	164.50
09/29/2025	Lodging David MacGreevey - JW Marriott, Houston, TX 2025-09-29 2025-09-30	500.00
09/29/2025	Lodging Chase Hood JW Marriott, Houston, TX 2025-09-29 2025-09-30	432.37
09/29/2025	Individual Meal - David MacGreevey - Breakfast	9.93
09/29/2025	Group Meal - David MacGreevey - Dinner - David MacGreevey; Chase Hood	150.00
09/30/2025	Parking/Tolls Chase Hood Parking - White & Case office	40.00
09/30/2025	Parking/Tolls Chase Hood Hotel parking for deposition and DIP hearing	60.62
09/30/2025	Lodging David MacGreevey JW Marriott, Houston, TX 2025-09-30 2025-10-01	500.00
09/30/2025	Individual Meal - David MacGreevey - Breakfast	53.03
09/30/2025	Individual Meal - Chase Hood - Dinner	39.56
09/30/2025	Individual Meal - Chase Hood - Breakfast	12.87
Total Expenses		**2,567.78**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20014495Pa0001

Expenses		Amount
Airfare		340.49
Ground Transportation		529.53
Lodging		1,432.37
Meals		265.39
Total Expenses	**USD**	**2,567.78**

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

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

WHITE & CASE LLP'S FIRST MONTHLY FEE STATEMENT FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 TO AND INCLUDING SEPTEMBER 30, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in the Cases:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	10/31/2025 [Docket No. 616]	
	Beginning of Period	**End of Period**
Time period covered by this Statement:	September 9, 2025	September 30, 2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:		$2,064,621.60 (80% of $2,580,777.00)
Total reimbursable expenses requested in this Statement		$20,974.54
Total fees and expenses requested in this Statement (exclusive of 20% Holdback):		$2,085,596.14
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):		$2,601,751.54
Summary of Attorney Fees Requested[2]		
Total attorney fees requested in this Statement:		$2,510,231.00
Total actual attorney hours covered by this Statement:		1,611.7
Average hourly rate for attorneys:		$1,558
Summary of Paraprofessional Fees Requested[3]		
Total paraprofessional fees requested in this Statement:		$70,546.00
Total actual paraprofessional hours covered by this Statement:		133.1
Average hourly rate for paraprofessionals:		$530

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

[2] Includes staff attorneys.

[3] May include individuals who are admitted to the bar.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* ("Compensation Procedures Order") [Docket No. 500], each Notice Party (as defined therein) receiving notice of the Monthly Statement will have until 4:00 p.m. (prevailing Central Time) 14 days after the filing of the Monthly Statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay White & Case an amount of 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement that are not objected to.

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, hereby files this monthly statement (this "Monthly Statement") for the period from September 9, 2025 to and including September 30, 2025 (the "Fee Period") requesting an aggregate amount of $2,085,596.14 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Committee in the amount of $2,064,621.60, representing 80% of the $2,580,777.00 of fees earned by White & Case for professional services to the Committee during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Fee Period in connection with such services in the amount of $20,974.54.

1. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by project category is attached here to as **Exhibit B.** A detailed statement of White & Case's hours expended and fees earned during the Fee Period is attached hereto as **Exhibit C**. A summary of White & Case's expenses incurred for which reimbursemet is sought grouped by category is attached hereto as **Exhibit D**. A detailed statement of White & Case's expenses incurred for which reimbursement is sought is attached hereto as **Exhibit E**.

2. White & Case attorneys and paraprofessionals expended a total of 1,744.8 hours in connection with the chapter 11 cases during the Fee Period. All services rendered by White &

Case for which compensation is sought pursuant to this Monthly Statement were rendered solely to or on behalf of the Committee. No payments were received by White & Case from any source other than the Debtors for services rendered or to be rendered in connection with the chapter 11 cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Statement shall serve via email to White & Case and each of the Notice Parties (defined in the Compensation Procedures Order) a written objection identifying with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses, and the basis for such objection (the "Objection") on or before the objection deadline.

4. Upon expiration of the objection deadline, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Statement that are not subject to an objection. If an Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and White & Case shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay White & Case an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

5. Although White & Case has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this Monthly Statement due to delays caused by accounting and processing during the Fee Period. White & Case reserves the right to make further statements or applications to this Court for allowance of such fees and expenses not included herein, which further statement will be filed in

accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

November 7, 2025
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP
Charles R. Koster (Texas Bar No. 24128278)
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- and -

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on November 7, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Summary of Hours and Fees by Timekeeper

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Aquije, Alonso	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	44.1	$1,110.00	$48,951.00
Bagdasarian, Amy	**Associate**	2003	Debt Finance Practice	8.8	$1,580.00	$13,904.00
Beil, Ryan	**Associate**	2021	Financial Restructuring & Insolvency (FRI) Practice	82.5	$1,280.00	$105,600.00
Bourgault, Jacob	**Associate**	N/A	Pool Associates - Corporate	7.7	$870.00	$6,699.00
Chase, Ashley	**Associate**	2016	Financial Restructuring & Insolvency (FRI) Practice	146.4	$1,580.00	$231,312.00
Chemborisov, Gleb	**Litigation Specialist**	N/A	Timekeeper Pool	24.5	$490.00	$12,005.00
Chen, Ken	**Project Manager - Litigation Support**	N/A	Practice Technology - Disputes	34.7	$490.00	$17,003.00
Chen, Tony	**Manager of Litigation Support**	N/A	Timekeeper Pool	2.6	$490.00	$1,274.00
Greissman, Scott	**Partner**	1995	Financial Restructuring & Insolvency (FRI) Practice	92.3	$2,500.00	$230,750.00
Hirshorn, Deanna	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	8.8	$490.00	$4,312.00
Hong, Alice	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	5.3	$1,370.00	$7,261.00
Isaac, Chantal	**Associate**	N/A	Pool Associates - Corporate	16.1	$870.00	$14,007.00
Kakani, Bhavini	**Associate**	2025	Litigation Practice	32.2	$870.00	$28,014.00
Koster, Charles	**Partner**	2009	Financial Restructuring & Insolvency (FRI) Practice	26.7	$1,900.00	$50,730.00
Lingle, Barrett	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	63.3	$1,370.00	$86,721.00
Litz, Dominic	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	67.7	$1,370.00	$92,749.00
Ludovici, Stephen	**Staff Attorney**	2014	Financial Restructuring & Insolvency (FRI) Practice	12.1	$1,110.00	$13,431.00
Magnaye, Maclin	**Litigation Specialist**	N/A	Practice Technology - Disputes	1.0	$420.00	$420.00
Mago, Don	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	93.8	$990.00	$92,862.00
Miranda, Loredana	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	204.7	$1,220.00	$249,734.00
Pesce, Gregory	**Partner**	2011	Financial Restructuring & Insolvency (FRI) Practice	68.3	$2,100.00	$143,430.00
Quintana, Anastasia	**Associate**	N/A	Pool Associates - Litigation	9.7	$870.00	$8,439.00
Rai, Parm	**Associate**	2024	Debt Finance Practice	11.7	$1,110.00	$12,987.00
Sachdev, Varoon	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	19.3	$1,420.00	$27,406.00
Shore, Christopher	**Partner**	1992	Financial Restructuring & Insolvency (FRI) Practice	118.8	$2,500.00	$297,000.00
Silnicki, Graham	**Associate**	2013	Debt Finance Practice	12.5	$1,470.00	$18,375.00
Slattery, Christine	**Legal Assistant**	N/A	Debt Finance Practice	25.7	$700.00	$17,990.00
Smith, Erin	**Counsel**	2014	Financial Restructuring & Insolvency (FRI) Practice	89.9	$1,630.00	$146,537.00

Venes, Aileen	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	1.3	$490.00	$637.00
Walz, Jacko	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	56.0	$870.00	$48,720.00
Wick, Katie	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	34.5	$490.00	$16,905.00
Yoo, Jade	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	33.7	$1,370.00	$46,169.00
Zahiremami, Golshid	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	112.7	$990.00	$111,573.00
Zakia, Jason	**Partner**	1999	Financial Restructuring & Insolvency (FRI) Practice	85.3	$2,200.00	$187,660.00
Zatz, Andrew	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	90.1	$2,100.00	$189,210.00
Grand Total				**1,744.8**		**$2,580,777.00**

Exhibit B

Statement of Hours and Fees by Project Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B04	Case Administration	69.1	$63,619.00
B05	Case Strategy	88.4	$160,819.00
B06	Cash Management & Intercompany Issues	23.0	$40,489.00
B07	Claims Administration & Objections	4.5	$6,578.00
B08	Committee Meetings & Communications	98.0	$170,866.00
B10	Creditor Communications	0.7	$1,670.00
B11	DIP Financing & Cash Collateral	445.5	$728,581.00
B12	Discovery	630.5	$866,612.00
B13	Exclusivity, Plan & Disclosure Statement	81.0	$113,452.00
B14	Executory Contracts & Unexpired Leases	6.8	$6,732.00
B15	Hearings & Court Matters	112.9	$206,017.00
B16	Investigation of Causes of Action	133.8	$154,365.00
B19	Non-Working Travel	4.6	$8,556.00
B20	Professional Retention & Fees - W&C	33.6	$35,177.00
B21	Professional Retention & Fees - Other	8.5	$10,879.00
B22	Reports, Schedules & US Trustee Issues	3.7	$5,945.00
B23	Tax Issues	0.2	$420.00
	Grand Total	**1,744.8**	**$2,580,777.00**

Exhibit C

Detailed Statement of Hours and Fees

WHITE & CASE

Official Committee of Unsecured Creditors of ModivCare Inc.
RE: Project Emcee

OUR REF: 1908759-0002

For professional services for the period ending 30 September 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Case Administration				
9 September 2025	Confer with D. Mago re: NOAs and PHVs for W&C team.	D Litz	0.40	548.00
9 September 2025	Meet with D. Litz re: workstreams.	L Miranda	0.30	366.00
9 September 2025	Draft template for ModivCare filings.	D Mago	0.80	792.00
9 September 2025	Update PHV motions for C. Shore, A. Zatz, S. Greissman and prepare PHV motions for G. Pesce, E. Smith, D. Litz and A. Chase (0.2); coordinate with K. Wick re: updating notice of appearance (0.1); submit request for ModivCare Creditors' Committee and Advisors listserv with external parties (0.6); emails with D. Litz, A. Venes and K. Wick re: CompuLaw and ECFX notifications (0.1).	Hirshorn, Deanna	1.00	490.00
9 September 2025	Prepare NOA draft for D. Litz.	K Wick	0.70	343.00
10 September 2025	Review NOA (0.3); internal correspondence with team (0.2).	C Koster	0.50	950.00
10 September 2025	Coordinate with W&C team re: action items.	B Lingle	0.30	411.00
10 September 2025	Review precedent notices of appearance and correspond with A. Zatz and D. Litz re: same (0.4); revise draft notice of appearance per C. Koster's comments (0.8).	D Mago	1.20	1,188.00
10 September 2025	Review and respond to Service Desk email re: creation of lists and additions to same (0.2); email D. Mago re: same (0.1); prepare and submit request for W&C ModivCare email distribution (0.1); prepare and submit request for W&C ModivCare Associate email distribution list (0.1); review, finalize and file notice of appearance (0.4).	Hirshorn, Deanna	0.90	441.00
10 September 2025	Download court filings (1.5); prepare shared folder (0.2); review docket for calendar dates (0.9); update list servs (1.6).	K Wick	4.20	2,058.00
11 September 2025	Review and revise NDA (0.9); calls with litigation team re: same (1.2).	E Smith	2.10	3,423.00
11 September 2025	Review and provide markup of 2nd day pleadings.	D Litz	3.00	4,110.00
11 September 2025	Analyze background material re: chapter 11 cases.	R Beil	1.50	1,920.00
11 September 2025	Correspondence with A. Zatz re: pro hac vice motions (0.1); review pro hac vice motions (0.6); correspondence with D. Hirshorn re: filing pro hac vice	D Mago	3.90	3,861.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	motions (0.1); correspondence with D. Litz, D. Hirshorn, and Service Desk re: email distribution lists (0.2); review listservs to ensure all members are added (0.3); send email to W&C team with various listservs (0.1); draft working group list (1.5); draft work-in-progress tracker (1.0).			
11 September 2025	Review background documents in case (0.1); Meet with L. Miranda and E. Smith re: case onboarding and background (0.3).	J Walz	0.40	348.00
11 September 2025	Review and respond to emails with D. Mago re: UCC members listserv (0.2); review and respond to email with D. Mago re: G. Pesce's pro hac vice motion (0.1); finalize pro hac motions (0.3); and file the pro hac vice motions for C. Shore (0.1); G. Pesce (0.1); S. Greissman (0.1); and A. Zatz (0.1).	Hirshorn, Deanna	1.00	490.00
11 September 2025	Review docket (0.1); update court filings folder (0.1).	K Wick	0.20	98.00
12 September 2025	Review Alix diligence requests.	E Smith	0.50	815.00
12 September 2025	Correspondence with J. Yoo re: revisions to working group list and revise same (0.1); draft work in progress tracker (0.9).	D Mago	1.00	990.00
12 September 2025	Review docket (0.1); update court filings folder (0.1).	K Wick	0.20	98.00
15 September 2025	Attend telephone conference with W&C team re: work in process and next steps.	B Lingle	0.30	411.00
15 September 2025	Attend ModivCare work in progress meeting (0.5); revise work in progress list and confer with B. Lingle, D. Mago and L. Miranda re: same (0.4); Confer with W&C and Alix team re: advisor NDA (0.4).	D Litz	1.30	1,781.00
15 September 2025	Update work in progress with litigation updates (0.4); email with J. Yoo and E. Smith re: same (0.1); update work in progress with comments from J. Yoo (0.1); email with D. Mango re: same (0.1); attend W&C call re: work in progress (0.6); emails with J. Yoo re: proposed litigation workstreams (0.2).	L Miranda	1.50	1,830.00
15 September 2025	Attend meeting with W&C team re: status update and upcoming deadlines re: first day motions (0.3); attend work-in-progress call with W&C team (0.6); update working group list (0.2); correspondence with D. Litz re: working group list (0.1); correspondence with G. Zahiremami re: same (0.1); draft summary email to A. Zatz re: revisions to cash management order (0.3); draft email to C. Shore re: same (0.2); correspondence with S. Smith and Service Desk re: listservs (0.1); update work in progress tracker (0.6); draft daily work in progress update email (0.5); correspondence with W&C litigation team re: same (0.1); update work in progress tracker and email (0.1).	D Mago	3.20	3,168.00
15 September 2025	Email to K. Wick re: case calendar and notifications	G Zahiremami	0.40	396.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); locate precedent bar date summary and email same to W&C team (0.3).			
15 September 2025	Update ECFX notifications (0.2); execute NDA for D. Litz (0.2); correspondence with W&C team re: VDR (0.2); review docket and update court filings folder (0.2).	K Wick	0.80	392.00
16 September 2025	Revise work in progress (0.2); email with D. Mago re: same (0.1); email with W&C litigation team re: same (0.1).	L Miranda	0.40	488.00
16 September 2025	Revise work in progress update email.	D Mago	0.10	99.00
16 September 2025	Review and revise work in progress tracker (0.6); confer with W&C team re: same (0.1); prepare summary email and send same to W&C team (0.2).	G Zahiremami	0.90	891.00
16 September 2025	Review docket and update case calendar (0.2); coordinate printing of org charts for L. Miranda (0.4); correspondence with D. Litz and D. Hirshorn re: service (0.3); calendar hearing for team (0.2).	K Wick	1.10	539.00
17 September 2025	Update work in progress (0.2); email with D. Mago re: same (0.1).	L Miranda	0.30	366.00
17 September 2025	Revise working group lists (0.4); update daily work in progress email (0.2).	D Mago	0.60	594.00
17 September 2025	Review and revise work in progress (0.7); confer with W&C team re: same (0.1); prepare summary email and share same with W&C team (0.2).	G Zahiremami	1.00	990.00
17 September 2025	Review docket and update case calendar.	K Wick	0.10	49.00
18 September 2025	Call with Committee advisors to discuss work in progress (0.5); calls with litigation team re: active workstreams (0.4).	E Smith	0.90	1,467.00
18 September 2025	Review and revise work in progress tracker (0.2); confer with D. Mago, B. Lingle, and G. Zahiremami re: same (0.5).	D Litz	0.70	959.00
18 September 2025	Update work in progress email (0.5); correspondence with D. Litz re: same (0.1); revise same and send to W&C team (0.1); update work in progress email (0.2).	D Mago	0.90	891.00
18 September 2025	Review docket and update case calendar (0.2); correspondence with G. Zahiremami re: emergency hearing (0.1); register attorney appearances (0.2); correspondence with MCO re: case updates (0.1); pull schedules and SOFAs (3.2).	K Wick	3.80	1,862.00
19 September 2025	Update work in progress email and send to D. Litz and B. Lingle for review.	D Mago	0.20	198.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 September 2025	Review and provide comments to work in progress tracker (0.1); email same to D. Mago (0.1).	G Zahiremami	0.20	198.00
19 September 2025	Review docket and update case calendar (0.2); pull schedules and SOFAs (3.9); prepare share site with same (0.5).	K Wick	4.60	2,254.00
20 September 2025	Call with Alix partners re: works in progress.	E Smith	0.70	1,141.00
20 September 2025	Attend telephone conference with V. Sachdev re: case administration.	B Lingle	0.30	411.00
20 September 2025	Update work in progress tracker.	D Mago	0.70	693.00
21 September 2025	Update work in progress tracker and revise per D. Litz's comments (0.7); update work in progress email tracker (0.2).	D Mago	0.90	891.00
22 September 2025	Correspond with A. Zatz re: action items (0.3); telephone conference with E. Smith re: same (0.3).	B Lingle	0.60	822.00
22 September 2025	Update work in progress.	L Miranda	0.90	1,098.00
22 September 2025	Update work in progress email (0.6); update work in progress document (0.4).	D Mago	1.00	990.00
22 September 2025	Review and revise work in progress (0.1); email to D. Mago re: same (0.1).	G Zahiremami	0.20	198.00
23 September 2025	Update work in progress (0.2); email with D. Mago re: same (0.1).	L Miranda	0.30	366.00
23 September 2025	Update daily work in progress email.	D Mago	0.30	297.00
23 September 2025	Update case calendar (0.2); confer with W&C team re: same (0.1).	G Zahiremami	0.30	297.00
23 September 2025	Review and respond to B. Lingle email re: assistance with filing of DIP Financing objection and supporting declaration (0.1); prepare for, and assist with finalizing for (0.9) and e-filing (0.1) of Creditors' Committee's objection to DIP Financing and sealed MacGreevey declaration; send courtesy copies of filings to Chambers (0.1); update pleadings file (0.1).	A Venes	1.30	637.00
23 September 2025	Update case calendar.	K Wick	0.10	49.00
24 September 2025	Call with A. Zatz and B. Lingle re: open workstreams and tasks related thereto.	V Sachdev	0.60	852.00
24 September 2025	Update work in progress email.	D Mago	0.20	198.00
24 September 2025	Review docket and update case calendar.	K Wick	0.10	49.00
25 September 2025	Coordination with team re: case administration, active	B Lingle	0.60	822.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	case issues.			
25 September 2025	Update work in progress email (0.6); conduct legal research re: Bankruptcy Rules re: service and notice (2.9); draft email to V. Sachdev re: same (0.2); call with V. Sachdev re: same (0.1); revise email re: same (0.3).	D Mago	4.10	4,059.00
25 September 2025	Review and revise work in progress (0.1); email to D. Mago re: same (0.1); attend standing call (0.3); confer with W&C team re: interim compensation procedures motion (0.1).	G Zahiremami	0.60	594.00
25 September 2025	Conference with A. Case and E. Smith re: case and depositions update.	C Isaac	0.30	261.00
25 September 2025	Research on court processes for A. Chase.	J Walz	0.30	261.00
25 September 2025	Review and respond to emails with A. Chase re: pro hac vice motion for J. Zakia (0.1); finalize and file same (0.1).	Hirshorn, Deanna	0.20	98.00
25 September 2025	Pull exhibits for A. Aquije (0.2); review docket for updates (0.1); update VDR folder with new documents (1.3).	K Wick	1.60	784.00
26 September 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
26 September 2025	Update work in progress email (0.5); review docket for upcoming deadlines and omnibus dates (0.2).	D Mago	0.70	693.00
26 September 2025	Review and revise work in progress (0.1); email to W&C team re: same (0.1); emails with E. Smith and confer with Paris office re: binder delivery (0.3).	G Zahiremami	0.50	495.00
26 September 2025	Pull sealed exhibits for L. Miranda (0.2); review docket for updates (0.2); correspondence with G. Zahiremami re: binder (0.2); update VDR folder with new documents (0.2).	K Wick	0.80	392.00
29 September 2025	Update work in progress email.	D Mago	0.50	495.00
29 September 2025	Review and revise work in progress tracker (0.5); emails with W&C team re: same (0.1); circulate filings to team (0.2).	G Zahiremami	0.80	792.00
29 September 2025	Update case calendar.	K Wick	0.10	49.00
30 September 2025	Update work in progress email.	D Mago	0.30	297.00
30 September 2025	Emails with E. Smith re: pro hac vice motion (0.1); update CompuLaw and ECFX distribution to include V. Sachdev (0.1).	Hirshorn, Deanna	0.20	98.00
30 September 2025	Register attorneys for hearing (0.2); correspondence with W&C team re: hearing materials (0.2); update	K Wick	1.50	735.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	case calendar (0.3); update VDR local drive with new documents (0.8).			
SUBTOTAL: Case Administration			**69.10**	**63,619.00**

Case Strategy

9 September 2025	Attend initial post-pitch strategy meeting (0.5); attend kick off call with L&W team (0.5); follow up correspondence re: timeline of dates (0.4).	S Greissman	1.40	3,500.00
9 September 2025	Confer with C. Shore re: case strategy.	J Zakia	0.50	1,100.00
9 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	0.80	1,680.00
9 September 2025	Attend internal meeting (0.4); review status and filings (0.4).	C Koster	0.80	1,520.00
9 September 2025	Call among W&C re: initial work streams and strategy (0.4).	A Chase	0.40	632.00
9 September 2025	Review first day presentation (0.3); review Creditors' Committee pitch materials (0.5).	A Chase	0.80	1,264.00
9 September 2025	Attend telephone conference with A. Zatz re: ModivCare background and deck for first Creditors' Committee meeting.	B Lingle	0.40	548.00
9 September 2025	Attend W&C team strategy call.	J Yoo	0.40	548.00
9 September 2025	Review first day pleadings and Disclosure Statement (1.7); attend W&C call re: strategy and work streams (0.3); follow-up call with litigation team re: same (0.2); draft notes from W&C call and circulate to team (0.3).	L Miranda	2.50	3,050.00
9 September 2025	Draft key dates slide (1.2); review first day motions and orders and create issues list (6.3).	D Mago	7.50	7,425.00
10 September 2025	Internal strategy call.	S Greissman	0.80	2,000.00
10 September 2025	Review financial advisor materials and related correspondence (1.4); attend conference call with Alix Partners team re: kickoff, advisory role and tasks (0.4); financial advisor follow up call (0.2).	S Greissman	2.00	5,000.00
10 September 2025	Team meetings (1.0); review second day motions (2.0).	J Shore	3.00	7,500.00
10 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	0.80	1,680.00
10 September 2025	Attend intro strategy call with Alix.	A Zatz	1.00	2,100.00
10 September 2025	Review discovery.	C Koster	0.30	570.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 September 2025	Meeting with W&C and Alix team re: strategy.	D Litz	0.50	685.00
10 September 2025	Review first day filings and draft issues list.	D Mago	1.70	1,683.00
11 September 2025	Calls with debtors and creditors (0.5); review background materials (0.7); review debtor "care package" (1.5).	J Shore	2.70	6,750.00
11 September 2025	Team calls (0.6); outline motion strategies (1.1).	J Shore	1.70	4,250.00
11 September 2025	Confer with W&C team re: litigation strategy.	J Zakia	0.20	440.00
11 September 2025	Attend intro call with Paul Hastings.	A Zatz	0.40	840.00
11 September 2025	Attend strategy call with C. Shore (0.1); attend internal strategy meeting (0.5); attend strategy call with S. Greissman (0.3).	A Zatz	0.90	1,890.00
11 September 2025	Review recent case filings.	C Koster	0.30	570.00
11 September 2025	Attend Creditors' Committee meeting (0.5); emails Debtors' counsel re: scheduling (0.3).	C Koster	0.80	1,520.00
11 September 2025	Prepare for meeting with Paul Hastings (0.7); meeting with Paul Hastings re: case strategy (1.0).	D Litz	1.70	2,329.00
11 September 2025	Attend kickoff meeting with B. Lingle and L. Miranda re: Creditors' Committee mandate and case strategy (0.4); review W&C pitch deck to Committee re: same (0.8).	R Beil	1.20	1,536.00
11 September 2025	Analyze first day motions and orders and revise comment chart per D. Litz's comments (3.9); correspondence with D Litz re: same (0.1).	D Mago	4.00	3,960.00
12 September 2025	Confer with C. Shore re: valuation issues.	J Zakia	0.50	1,100.00
12 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	0.80	1,680.00
12 September 2025	Review working group list (0.1); review update from Alix (0.1).	A Zatz	0.20	420.00
12 September 2025	Analyze First Day Declaration re: case strategy (0.8); analyze RSA re: same (1.3); analyze DIP Financing term sheet re: same (0.5); analyze RSA term sheet re: same (0.5).	R Beil	3.10	3,968.00
14 September 2025	Correspondence and conference call with Alix re: diligence and status (0.5); review Chapter 11 filing documents and first day pleadings (2.5).	S Greissman	3.00	7,500.00
15 September 2025	Internal meeting re: active workstreams (0.3); reviewed materials and review schedule (0.6).	S Greissman	0.90	2,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 September 2025	Attend team call re: case strategy.	J Zakia	0.50	1,100.00
15 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	0.80	1,680.00
15 September 2025	Attend team strategy call (0.5) and internal strategy call (1.0).	A Zatz	1.50	3,150.00
15 September 2025	Review NDA (0.3); review stipulation with Chubb (0.3); review case work in progress tracker (0.2).	A Zatz	0.80	1,680.00
15 September 2025	Attend internal meeting re: active workstreams.	C Koster	0.40	760.00
15 September 2025	Call among W&C re: workstreams.	A Chase	0.40	632.00
15 September 2025	Meeting with W&C and Alix team re: upcoming hearing strategy (0.8); meeting with W&C team and Alix team re: case strategy and upcoming hearing (0.8).	D Litz	1.60	2,192.00
15 September 2025	Attend restructuring ModivCare work in progress call re: case strategy and workstreams (0.5); attend broader W&C call re: same (0.3).	R Beil	0.80	1,024.00
15 September 2025	Attend W&C strategy and update call.	L Miranda	0.30	366.00
15 September 2025	Attend calls with W&C team re: case strategy.	G Zahiremami	0.60	594.00
16 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	0.80	1,680.00
16 September 2025	Attend strategy meeting with S. Greissman.	A Zatz	0.20	420.00
16 September 2025	Attend update call with L&W.	A Zatz	0.30	630.00
16 September 2025	Attend telephone conference with W&C, Alix teams re: case strategy.	B Lingle	0.80	1,096.00
16 September 2025	Work in progress call with W&C team (0.7); call with W&C and AlixPartners team re: case strategy (1.0).	D Litz	1.70	2,329.00
17 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	1.60	3,360.00
17 September 2025	Call with Alix re: valuation analysis.	A Zatz	0.50	1,050.00
17 September 2025	Strategy meeting with S. Greissman (0.2); and strategy call with S. Greissman (0.3).	A Zatz	0.50	1,050.00
17 September 2025	Call with W&C and Alix team re: case strategy and unencumbered assets.	D Litz	0.90	1,233.00
17 September 2025	Meet with A. Chase re: workstreams and litigation strategy.	L Miranda	0.60	732.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 September 2025	Calls re: valuation issues.	J Shore	0.60	1,500.00
18 September 2025	Review discovery issues.	J Zakia	0.20	440.00
18 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	0.80	1,680.00
18 September 2025	Strategy call with C. Shore.	A Zatz	0.50	1,050.00
18 September 2025	Attend telephone conference with W&C, Alix teams re: case strategy and action items.	B Lingle	0.50	685.00
18 September 2025	Assist with setting up requested searches (0.3); add new users to workspace (0.2).	G Chemborisov	0.50	245.00
19 September 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	1.60	3,360.00
19 September 2025	Internal strategy calls.	A Zatz	0.80	1,680.00
20 September 2025	Advisor calls (1.0); review production materials (0.8).	J Shore	1.80	4,500.00
20 September 2025	Review materials re: matter strategy (0.6); call with B. Lingle re: matter strategy (0.3); correspondence with partner leads re: same (0.1).	V Sachdev	1.00	1,420.00
22 September 2025	Attend W&C team call re: second day hearing.	J Yoo	0.50	685.00
23 September 2025	Reviewing valuation.	A Zatz	0.30	630.00
24 September 2025	Strategy call with E. Smith (0.2); strategy call with V. Sachdev and B. Lingle (0.4); strategy calls with S. Greissman (0.3); and correspondence re: Quinn investigation (0.2).	A Zatz	1.10	2,310.00
24 September 2025	Attend telephone conference with A. Zatz, V. Sachdev re: action items and case strategy.	B Lingle	0.70	959.00
24 September 2025	Confer with W&C team re: Disclosure Statement objection.	G Zahiremami	0.30	297.00
25 September 2025	Liquidation review.	J Shore	2.00	5,000.00
25 September 2025	Strategy call with S. Greissman (0.2); and strategy call with E. Smith and V. Sachdev (0.4).	A Zatz	0.60	1,260.00
25 September 2025	Attend W&C team call re: second day hearing.	J Yoo	0.50	685.00
26 September 2025	Review settlement proposal and internal discussion re: same.	S Greissman	0.40	1,000.00
26 September 2025	Reviewing settlement offer.	A Zatz	0.30	630.00
26 September 2025	Internal strategy call (1.0); and strategy call with S.	A Zatz	1.10	2,310.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Greissman (0.1).			
26 September 2025	Internal call with core team re: go-forward strategy and open workstreams.	V Sachdev	0.50	710.00
26 September 2025	Attend telephone conference with W&C team re: next steps and strategy.	B Lingle	0.50	685.00
27 September 2025	Confer with W&C team re: second day hearing.	J Yoo	0.20	274.00
28 September 2025	Internal conference call re: hearing preparation and related (0.8); hearing preparation and review of first day papers, plan, disclosure statement and related (1.2).	S Greissman	2.00	5,000.00
28 September 2025	Call re: liquidity forecast.	J Shore	0.80	2,000.00
28 September 2025	Strategy call with B. Lingle (0.3); internal strategy call (0.5); and strategy call with C. Koster (0.4).	A Zatz	1.20	2,520.00
28 September 2025	Confer with W&C team re: second day hearing.	J Yoo	0.40	548.00
29 September 2025	Strategy call with C. Shore (0.1); strategy call with C. Koster (0.5); strategy calls with S. Greissman (0.9); strategy call with B. Lingle (0.1); and strategy call with C. Koster and S. Greissman (0.7).	A Zatz	2.30	4,830.00
30 September 2025	Strategy call with S. Greissman and C. Koster.	A Zatz	0.80	1,680.00
SUBTOTAL: Case Strategy			**88.40**	**160,819.00**

Cash Management & Intercompany Issues

11 September 2025	Review first day orders, including critical vendor motion.	S Greissman	0.90	2,250.00
11 September 2025	Correspondence with D. Litz re: revisions to cash management and critical vendor orders (0.2); revise cash management order (0.7); revise critical vendor motion (0.7); review and comment on draft email re: issues with interim orders (0.2); correspondence with A. Zatz re: revisions to cash management and critical vendor orders (0.1).	D Mago	1.90	1,881.00
13 September 2025	Review cash management motion.	A Zatz	0.40	840.00
14 September 2025	Comment on trade payments order (0.4); comment on cash management order (0.3).	A Zatz	0.70	1,470.00
15 September 2025	Reviewed critical and cash management orders and related.	S Greissman	0.60	1,500.00
15 September 2025	Revise cash management order (0.6); revise critical vendors orders (0.7).	A Zatz	1.30	2,730.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 September 2025	Research customary SD Tex. language re: critical vendors order markup (2.1); summarize precedent language for markup re: same (0.3).	R Beil	2.40	3,072.00
15 September 2025	Legal research re: precedent cash management orders (1.5): revise cash management order (0.2); revise critical vendor order (0.2).	D Mago	1.90	1,881.00
15 September 2025	Review precedent critical vendors orders (0.2); email to W&C team re: same (0.1); review WGL and email to D. Mago re: same (0.1).	G Zahiremami	0.40	396.00
16 September 2025	Correspondence and teleconference with J. Weichselbaum re: critical vendor motion and next steps (0.4); review updated cash management and critical vendor order (0.5).	S Greissman	0.90	2,250.00
16 September 2025	Calls re: critical vendors amendment (0.9); review critical vendors request (0.3).	J Shore	1.20	3,000.00
16 September 2025	Revise trade payments order (0.1); revise cash management orders (0.1); address issues and prepare materials on request for additional prepetition trade payments (3.6).	A Zatz	3.80	7,980.00
16 September 2025	Revise cash management order.	D Mago	0.90	891.00
17 September 2025	Correspondence with J. Weichselbaum re: critical vendor request (0.1); internal conference call with C. Shore re: critical vendor (0.1); conference call with C. Shore re: hearing on critical vendor (0.1).	S Greissman	0.30	750.00
17 September 2025	Reviewing cash management order.	A Zatz	0.70	1,470.00
17 September 2025	Review correspondence from M. Gates (Alix) re: critical vendor order reporting requirements (0.1); review precedent critical vendor orders (0.3); draft proposed revision and send to A. Zatz and D. Litz re: same (0.2); review Latham's revisions to critical vendor order (0.1).	D Mago	0.70	693.00
18 September 2025	Review critical vendor-related hearing and correspondence (0.5); issues relating to critical vendor emergency motion and follow up (1.1).	S Greissman	1.60	4,000.00
18 September 2025	Analyze emergency motion re: critical vendor cap (0.2); summarize same (0.2).	R Beil	0.40	512.00
18 September 2025	Analyze revised critical vendor order re: proposed language.	D Mago	0.20	198.00
22 September 2025	Attend telephone conference with M. Gates re: cash management order (0.2); correspond with A. Zatz re: same (0.2).	B Lingle	0.40	548.00
25 September 2025	Review Debtors correspondence re: escrow fee.	S Greissman	0.10	250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 September 2025	Revising cash management order.	A Zatz	0.20	420.00
25 September 2025	Review cash management order (0.5); attend telephone conference with M. Gates re: intercompany transactions (0.5); correspond with A. Zatz re: same (0.1).	B Lingle	1.10	1,507.00
SUBTOTAL: Cash Management & Intercompany Issues			**23.00**	**40,489.00**

Claims Administration & Objections

11 September 2025	Review Chubb comments to bar date.	S Greissman	0.10	250.00
15 September 2025	Analyze bar date order (0.4); draft correspondence to Committee re: Bar Date and proof of claim instructions (1.0).	D Mago	1.40	1,386.00
16 September 2025	Analyze Bar Date order and Interim and final DIP Financing orders re: filing master proofs of claims (0.4); correspondence with D. Litz re: same (0.1).	D Mago	0.50	495.00
17 September 2025	Call with L&W re: vendor payments (0.2); reviewing supplemental trade payments motion (0.3) and related correspondence (0.1).	A Zatz	0.60	1,260.00
17 September 2025	Confer with LW re: bar date and master proof of claim (0.1); confer with W&C team and counsel for WSFS re: same (0.3).	D Litz	0.40	548.00
24 September 2025	Sending update on bar date (0.3) and bar date correspondence (0.5).	A Zatz	0.80	1,680.00
24 September 2025	Telephone conference with J. Levine re: omnibus POC by trustee (0.2); correspond with W&C team re: bar date (0.5).	B Lingle	0.70	959.00
SUBTOTAL: Claims Administration & Objections			**4.50**	**6,578.00**

Committee Meetings & Communications

9 September 2025	Preparation for FA pitches.	J Shore	0.90	2,250.00
9 September 2025	Conferences with W&C, Alix and Creditors' Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
9 September 2025	Attend intro call with Company counsel.	A Zatz	0.80	1,680.00
9 September 2025	Prepare bylaws for Creditors' Committee (4.5); prepare for and schedule Creditors' Committee meeting for FA pitches (3.6).	D Litz	8.10	11,097.00
9 September 2025	Draft Creditors' Committee bylaws (1.1); email with D. Litz re: same (0.1).	L Miranda	1.20	1,464.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 September 2025	Attend Creditors' Committee meeting re: financial advisor pitches (2.1); review Creditors' Committee deck for kick off meeting (0.4).	S Greissman	2.50	6,250.00
10 September 2025	Committee meetings (2.4); FA pitches and follow up (2.3).	J Shore	4.70	11,750.00
10 September 2025	Conferences with W&C, Alix and Creditors' Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
10 September 2025	Revise Creditors' Committee bylaws (0.6); review intro deck for Creditors' Committee (0.6); attend financial advisor pitches (2.4); Creditors' Committee calls to discuss hiring financial advisor (0.7).	A Zatz	4.30	9,030.00
10 September 2025	Calls with Committee and potential financial advisors (2.2); calls with litigation team re: same (1.0).	E Smith	3.20	5,216.00
10 September 2025	Review, revise Creditors' Committee by-laws.	B Lingle	0.90	1,233.00
10 September 2025	Revise deck for Creditors' Committee meeting (3.0); Creditors' Committee meeting and follow up to financial advisor pitches (2.0).	D Litz	5.00	6,850.00
10 September 2025	Draft slides re: DIP Financing for Creditors' Committee deck (1.3); emails with D. Litz re: same (0.2); revise Creditors' Committee bylaws with comments from B. Lingle (0.6); email to A. Zatz re: same (0.1).	L Miranda	2.20	2,684.00
10 September 2025	Assist in preparation of Unsecured Creditors' Committee introduction presentation (0.7); attend meeting of Unsecured Creditors Committee re: Financial Advisors pitch (2.4).	D Mago	3.10	3,069.00
11 September 2025	Attend introductory Creditors' Committee meeting and follow up (1.1); Review materials and prepare for Creditors' Committee kick off call (1.4); Attend internal pre-call (0.5).	S Greissman	3.00	7,500.00
11 September 2025	Creditors' Committee meeting (1.1); review FA pitches (0.6).	J Shore	1.70	4,250.00
11 September 2025	Update call with Creditors' Committee (0.7); revise bylaws (0.3).	A Zatz	1.00	2,100.00
11 September 2025	Meeting with Creditors' Committee members.	E Smith	1.00	1,630.00
11 September 2025	Review draft presentation to Committee (0.4); attend call with Committee (0.6).	A Chase	1.00	1,580.00
11 September 2025	Participate in introductory meeting with Creditors' Committee.	B Lingle	0.30	411.00
11 September 2025	Creditors' Committee meeting.	D Litz	1.00	1,370.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 September 2025	Attend weekly Committee meeting (0.5).	J Yoo	0.50	685.00
11 September 2025	Attend Creditors' Committee introduction meeting (0.6); revise Creditors' Committee bylaws with comments from A. Zatz (0.5); email to W&C re: same (0.1).	L Miranda	1.20	1,464.00
11 September 2025	Attend meeting with W&C, Alix Partners, and Committee (0.6).	D Mago	0.60	594.00
12 September 2025	Conferences with W&C, Alix and Creditors' Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
12 September 2025	Draft 9/11 Creditors' Committee meeting minutes.	D Litz	2.50	3,425.00
15 September 2025	Review by laws for Creditors' Committee.	J Shore	0.80	2,000.00
15 September 2025	Conferences with W&C, Alix and Creditors' Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
15 September 2025	Review and revise Creditors' Committee Bylaws (1.9); emails with W&C re: Creditors' Committee bylaws (0.1); review and revise Creditors' Committee bylaws with comments from D. Litz (0.3); emails with D. Litz and B. Lingle re: same (0.3); email with A. Zatz re: same (0.1).	L Miranda	2.70	3,294.00
15 September 2025	Emails to Creditors' Committee re: calendar invites.	G Zahiremami	0.30	297.00
15 September 2025	Prepare binder of financial advisor pitches for S. Greissman.	K Wick	0.60	294.00
16 September 2025	Preparation for Creditors' Committee meeting.	J Shore	1.00	2,500.00
17 September 2025	Revise agenda for standing call with Committee members (0.3); correspondence with D. Litz re: same (0.1); correspondence with A. Zatz re: same (0.1).	D Mago	0.50	495.00
18 September 2025	Prepare for Creditors' Committee meeting and preparation-call with Alix (0.8); Creditors' Committee meeting (1.1); post meeting follow up re: various (0.3).	S Greissman	2.20	5,500.00
18 September 2025	Advisor calls (1.1); Creditors' Committee meeting (1.0).	J Shore	2.10	5,250.00
18 September 2025	Prepare for (0.5); and participate in advisors pre-call to Creditors' Committee call (1.1).	J Zakia	1.60	3,520.00
18 September 2025	Internal pre-call (0.5); and call with Creditors' Committee (1.0).	A Zatz	1.50	3,150.00
18 September 2025	Attend Creditors' Committee meeting (1.0); follow-up re: same (0.3).	C Koster	1.30	2,470.00
18 September 2025	Call with Creditors' Committee.	E Smith	1.00	1,630.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 September 2025	Attend preparation call among advisors (0.5); attend meeting with Creditors' Committee members (1.1).	A Chase	1.60	2,528.00
18 September 2025	Attend Creditors' Committee meeting.	B Lingle	1.00	1,370.00
18 September 2025	Creditors' Committee Advisor meeting (0.5); attend Creditors' Committee meeting (1.1); confer with A. Zatz re: Creditors' Committee meeting agenda and materials (0.5); circulate agenda to Committee (0.3).	D Litz	2.40	3,288.00
18 September 2025	Attend and take notes on Creditors' Committee call.	L Miranda	1.10	1,342.00
18 September 2025	Draft email correspondence to Committee re: agenda for 9.18 meeting and send to D. Litz for review (0.1); attend standing Committee call and take notes (1.2); send calendar invite to W&C, AlixPartners, and Committee re: meeting to discuss DIP Financing objection (0.1); draft meeting minutes re: 9.18 standing call (1.2).	D Mago	2.60	2,574.00
18 September 2025	Attend Creditors' Committee standing call re: strategy.	G Zahiremami	1.10	1,089.00
19 September 2025	Review critical vendors and Creditors' Committee materials.	J Shore	2.80	7,000.00
22 September 2025	Attend Creditors' Committee meetings re: DIP Financing objection.	A Chase	0.70	1,106.00
22 September 2025	Creditors' Committee meeting re: DIP Financing objection.	B Lingle	0.70	959.00
22 September 2025	Attend Creditors' Committee call re: DIP Financing.	L Miranda	0.80	976.00
22 September 2025	Attend Committee meeting and take notes re: DIP Financing objection (0.7); correspondence with Committee members re: bylaws (0.1); correspondence with L. Miranda re: same (0.1).	D Mago	0.90	891.00
23 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	0.80	1,680.00
23 September 2025	Analyze lease rejection and ordinary course professionals procedures motions re: Creditors' Committee updates (0.5); summarize re: same (0.3).	R Beil	0.80	1,024.00
23 September 2025	Draft meeting minutes re: 9/22 Committee meeting to discuss DIP Financing objection (0.4).	D Mago	0.40	396.00
24 September 2025	Reviewing UCC call agenda.	A Zatz	0.10	210.00
24 September 2025	Revise Creditors' Committee meeting agenda.	B Lingle	0.30	411.00
24 September 2025	Draft agenda for meeting with Committee on 9/25 (0.2); correspondence with B. Lingle re: same (0.1).	D Mago	0.30	297.00
24 September 2025	Prepare and send reminder emails to Creditors'	G Zahiremami	0.20	198.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Committee re: bar date.			
25 September 2025	Strategy Creditors' Committee call.	S Greissman	0.70	1,750.00
25 September 2025	Creditors' Committee call.	J Shore	1.00	2,500.00
25 September 2025	Pre-call for UCC meeting (0.3); circulating executed bylaws to UCC (0.1); weekly UCC meeting (0.5).	A Zatz	0.90	1,890.00
25 September 2025	Attend Creditors' Committee meeting.	C Koster	0.50	950.00
25 September 2025	Participate in advisors meeting (0.5); participate in Committee meeting (0.6).	E Smith	1.10	1,793.00
25 September 2025	Participate in advisors call to prepare for Creditors' Committee meeting (0.2); attend portion of Creditors' Committee meeting (0.2).	A Chase	0.40	632.00
25 September 2025	Preparation call in advance of Creditors' Committee call (0.3); attend call with Creditors' Committee (0.6).	V Sachdev	0.90	1,278.00
25 September 2025	Creditors' Committee meeting.	B Lingle	0.70	959.00
25 September 2025	Correspondence with Committee re: agenda for 9.25.25 standing call (0.1); attend meeting re: 9.25.25 standing call (0.6).	D Mago	0.70	693.00
26 September 2025	Conference call with Creditors' Committee members re: member fees.	S Greissman	0.20	500.00
29 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.40	2,940.00
30 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.40	2,940.00
SUBTOTAL: Committee Meetings & Communications			**98.00**	**170,866.00**

Creditor Communications

11 September 2025	Attend introduction call with 1L lender counsel.	S Greissman	0.50	1,250.00
24 September 2025	Call with bondholder.	A Zatz	0.20	420.00
SUBTOTAL: Creditor Communications			**0.70**	**1,670.00**

DIP Financing & Cash Collateral

9 September 2025	Review DIP Financing motion.	S Greissman	1.60	4,000.00
9 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 September 2025	Prepare DIP Financing objection.	A Zatz	1.50	3,150.00
10 September 2025	Outline key issues for DIP Financing objection.	J Zakia	1.30	2,860.00
10 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters.	G Pesce	1.80	3,780.00
10 September 2025	Prepare DIP Financing objection.	A Zatz	0.70	1,470.00
10 September 2025	Conference with A. Zatz, S. Greissman re: DIP Financing objection.	B Lingle	0.70	959.00
10 September 2025	Prepare DIP Financing objection.	D Litz	2.30	3,151.00
11 September 2025	Review DIP Financing motion.	S Greissman	0.70	1,750.00
11 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters.	G Pesce	2.80	5,880.00
11 September 2025	Comment on final DIP Financing order.	A Zatz	1.40	2,940.00
11 September 2025	Review DIP Financing motion.	A Chase	2.20	3,476.00
11 September 2025	Telephone conference with D. Litz re: DIP Financing objection and related workstreams (0.4); review DIP Financing order and case pleadings (0.7); analyze DIP Financing order (0.7).	B Lingle	1.80	2,466.00
11 September 2025	Confer with A. Zatz re: potential litigation issue research (0.5); potential litigation issue research and prepare memo of same (1.5); confer with B. Lingle re: DIP Financing objection (0.4).	D Litz	2.40	3,288.00
11 September 2025	Correspondence with J. Weichselbaum [Latham] re: interim DIP Financing order (0.1); compare interim DIP Financing order to final DIP Financing order (0.2).	D Mago	0.30	297.00
12 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters.	G Pesce	1.80	3,780.00
12 September 2025	Potential litigation issue research and prepare memo re: same.	D Litz	0.80	1,096.00
13 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters.	G Pesce	0.80	1,680.00
13 September 2025	Review DIP Financing credit agreement.	A Zatz	1.80	3,780.00
14 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters.	G Pesce	0.80	1,680.00
15 September 2025	Review DIP Financing order and related documents.	S Greissman	1.60	4,000.00
15 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters (0.9); Revise DIP	G Pesce	1.80	3,780.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Financing objection outline (0.9).			
15 September 2025	Revise DIP Financing objection.	A Zatz	3.20	6,720.00
15 September 2025	Review DIP Financing objection.	C Koster	0.40	760.00
15 September 2025	Analyze proposed final DIP Financing order (0.6); review DIP Financing objection outline (0.2).	B Lingle	0.80	1,096.00
15 September 2025	Confer with D. Litz re: potential litigation issue research (0.1); conduct research re: same (4.6); prepare write up re: same (1.4).	D Litz	6.10	8,357.00
15 September 2025	Review DIP Financing objection outline (0.2); review diligence on DIP Financing (0.6).	L Miranda	0.80	976.00
15 September 2025	Confer with D. Litz re: research (0.1); conduct research re: same (4.6); prepare write up re: same (1.4).	G Zahiremami	6.10	6,039.00
16 September 2025	Review draft DIP Financing order and analyze objection and potential objection (1.7); Internal conference call with A. Zatz, C. Shore and J. Zakia re: DIP Financing with critical vendor motion (0.9); draft DIP Financing objection (1.2).	S Greissman	3.80	9,500.00
16 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters (0.9); revise DIP Financing objection outline (0.9).	G Pesce	1.80	3,780.00
16 September 2025	Comment on DIP Financing order.	A Zatz	1.20	2,520.00
16 September 2025	Call with L. Miranda re: DIP Financing objection.	A Chase	0.40	632.00
16 September 2025	Draft DIP Financing objection (1.5); correspond with D. Litz re: same (0.2).	B Lingle	1.70	2,329.00
16 September 2025	Prepare DIP Financing objection outline (4.8); revise potential litigation issue memo (1.9); call with B. Lingle re: DIP Financing objection (0.3).	D Litz	7.00	9,590.00
16 September 2025	Analyze A. Zatz edits received to DIP Financing order (2.2); revise final DIP Financing order (2.5); analyze revised final DIP Financing order and conform definitions re: same (1.0); analyze RSA re: same (0.7); research precedent SD Tex. orders for certain language re: same (0.3); research precedent SD Tex. orders for certain other language re: same (0.3); research precedent SD Tex. orders re: same (0.5).	R Beil	7.50	9,600.00
16 September 2025	Meet with W&C litigation team re: DIP Financing objection work streams (0.8); review DIP Financing motion, order, initial budget, and summary of potential objection re: same (0.8); email with W&C re: DIP Financing budget (0.2); review documents in relativity re: same (0.2); call with A. Chase re: DIP Financing objection (0.4); conduct legal research re: DIP Financing (0.3); email with B. Lingle re: same (0.1).	L Miranda	2.80	3,416.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 September 2025	Conduct research and prepare write up re: potential litigation issue research (2.6); conduct follow up research re: same (1.4); email final summary to D. Litz for circulation (0.1); review DIP Financing papers for cites (2.3); email to L. Miranda re: same (0.1).	G Zahiremami	6.50	6,435.00
17 September 2025	Draft DIP Financing objection (3.3); review DIP Financing order (1.7).	S Greissman	5.00	12,500.00
17 September 2025	Revise DIP Financing objection outline.	G Pesce	1.80	3,780.00
17 September 2025	Draft DIP Financing objection (3.9); revise same (0.2).	B Lingle	4.10	5,617.00
17 September 2025	Revise DIP Financing objection (1.7); review and revise DIP Financing objection (0.7).	D Litz	2.40	3,288.00
17 September 2025	Research re: DIP Financing objection (3.3); analyze and summarize precedent DIP Financing from other cases (1.6); draft and revise objection re: same (0.3); analyze W&C markup of DIP Financing order re: same (0.2).	R Beil	5.40	6,912.00
17 September 2025	Conduct legal research for DIP Financing objection (3.9); draft summary of research re: same for DIP Financing objection (1.4); review precedent on DIP Financing objections for same (0.6).	L Miranda	5.90	7,198.00
17 September 2025	Review DIP Financing objection (0.3); confer with B. Lingle re: case cites re: same (0.1); conduct research re: same (2.6); emails to team re: same (0.1); conduct supplemental research re: potential litigation issue (2.8).	G Zahiremami	5.90	5,841.00
18 September 2025	Review / revise draft DIP Financing objection (0.8); review Creditors' Committee draft comments on DIP Financing order (1.2).	S Greissman	2.00	5,000.00
18 September 2025	Review and revise DIP Financing objection (1.1); confer with S. Greissman re: same (0.3).	J Zakia	1.40	3,080.00
18 September 2025	Revise DIP Financing objection.	G Pesce	1.90	3,990.00
18 September 2025	Correspondence re: DIP Financing order language (0.5); and revising DIP Financing order (2.3).	A Zatz	2.80	5,880.00
18 September 2025	Call among document review team re: DIP Financing document review (0.5); review documents for DIP Financing depositions (2.9); email with document review team to prepare for depositions (1.4).	A Chase	4.80	7,584.00
18 September 2025	Draft DIP Financing objection.	B Lingle	1.80	2,466.00
18 September 2025	Revise DIP Financing objection preliminary statement (0.5); review and revise argument section of DIP Financing objection (0.8); call with A. Zatz re: DIP Financing objection (0.7); confer with W&C team re: revisions to DIP Financing objection (1.3).	D Litz	3.30	4,521.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 September 2025	Internal teleconference regarding DIP Financing facility and proposed terms (0.9); attention to DIP Financing facility documentation and comments to order (2.1); conference call with advisors re: DIP Financing backstop comparables and follow up (1.5); attention to DIP Financing objection (1.2).	S Greissman	5.70	14,250.00
19 September 2025	Calls and emails re: DIP Financing objection.	J Shore	2.20	5,500.00
19 September 2025	Review draft DIP Financing objection (1.5); confer with W&C team re: DIP Financing issues (0.5); confer with experts re: same (1.1).	J Zakia	3.10	6,820.00
19 September 2025	Conferences with W&C team re: DIP Financing objection and discovery matters (0.9); revise DIP Financing objection (0.9).	G Pesce	1.80	3,780.00
19 September 2025	Call with Alix re: DIP Financing objection (0.5); and revising DIP Financing objection (7.5).	A Zatz	8.00	16,800.00
19 September 2025	Review draft DIP Financing objection.	A Chase	0.40	632.00
19 September 2025	Revise DIP Financing objection (2.8); attend telephone conference with W&C team re: same (0.4); attend telephone conference with Alix re: backstop comps (0.6).	B Lingle	3.80	5,206.00
19 September 2025	Revise DIP Financing objection (5.6); meeting with W&C restructuring team re: DIP Financing objection (1.0); meeting with W&C re: DIP Financing objection and proposed order (0.4); meeting with Alix team and W&C team re: backstop comparables (0.7).	D Litz	7.70	10,549.00
19 September 2025	Attend W&C call re: DIP Financing objection (0.5); draft and revise miscellaneous argument section re: same (1.3); conduct research re: same (2.8);; attend W&C call re: DIP Financing order (0.3); draft and revise final order re: same (1.4).	R Beil	6.30	8,064.00
19 September 2025	Conference with A. Aquije re: DIP Financing comparison chart.	L Miranda	0.20	244.00
19 September 2025	Review credit agreement term sheets and drafts (2.4); draft DIP Financing comparison chart (2.3).	A Aquije	4.70	5,217.00
19 September 2025	Research re: DIP financing (3.9); legal research re: precedent postpetition financing motions and objection (2.2); legal research re: precedent case and DIP Financing related issues (1.1); correspondence with D. Litz, A. Zatz, and S. Greissman re: same (0.1).	D Mago	7.30	7,227.00
19 September 2025	Draft DIP Financing declaration (2.8); email same to W&C team (0.1); conduct research re: DIP Financing objection (5.4); review and revise DIP Financing objection re: same (1.6); attend calls with W&C team re: DIP Financing objection (0.6).	G Zahiremami	10.50	10,395.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 September 2025	Review and revise DIP Financing objection.	S Greissman	1.50	3,750.00
20 September 2025	Conferences with W&C team re: DIP Financing objection.	J Zakia	0.90	1,980.00
20 September 2025	Call with Alix re: DIP Financing objection (0.5); internal call re: same (0.3); revising DIP Financing objection (2.9) and related call with S. Greissman (0.1).	A Zatz	3.80	7,980.00
20 September 2025	Review DIP Financing objection and revise rider.	E Smith	0.80	1,304.00
20 September 2025	Call among W&C and Alix re: DIP Financing objection.	A Chase	0.80	1,264.00
20 September 2025	Revise DIP Financing objection (0.7); review, revise DIP Financing declaration (0.8); telephone conference with W&C and Alix teams re: DIP Financing hearing and objection (0.9).	B Lingle	2.40	3,288.00
20 September 2025	Revise DIP Financing objection (2.7); meeting with W&C team and Alix team re: DIP Financing (1.0).	D Litz	3.70	5,069.00
20 September 2025	Review and revise sections of DIP Financing objection with comments from A. Zatz (2.2); emails with E. Smith and A. Chase re: litigation section re: same (0.3); attend call with Alix & W&C re: DIP Financing objection (0.8); research re: DIP Financing objection (1.2); email with D. Litz and B. Lingle re: same (0.2).	L Miranda	4.70	5,734.00
20 September 2025	Draft credit agreement analysis.	A Aquije	2.00	2,220.00
20 September 2025	Legal research in support of DIP Financing objection (5.2); correspondence with A. Zatz re: challenge period (0.2); draft case explanation summary for A. Zatz re: research (0.5).	D Mago	5.90	5,841.00
20 September 2025	Conduct research re: DIP Financing precedent (5.4); review and revise DIP Financing objection (2.8); confer with W&C team re: same (0.2); revise DIP Financing declaration and email same to B. Lingle (0.8).	G Zahiremami	9.20	9,108.00
21 September 2025	Review and revise DIP Financing objection.	S Greissman	2.60	6,500.00
21 September 2025	Confer with W&C team re: DIP Financing objection (0.9); confer with potential testifying expert (0.5); review revised objection (0.4).	J Zakia	1.80	3,960.00
21 September 2025	Call with Alix re: DIP Financing objection (0.3); revising DIP Financing objections (2.4); related call with S. Greissman (0.2); and related correspondence (0.2).	A Zatz	3.10	6,510.00
21 September 2025	Call among W&C and Alix re: DIP Financing.	A Chase	0.30	474.00
21 September 2025	Draft DIP Financing declaration (2.1); attend telephone conference with W&C, Alix teams re: case timeline and runway (0.4).	B Lingle	2.50	3,425.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
21 September 2025	Research re: DIP Financing objection (1.1); correspondence re: same (0.1).	R Beil	1.20	1,536.00
21 September 2025	Conduct second level review of responsive documents re: DIP Financing (2.6); draft summary of hot documents re: same (1.3); review documents produced by Debtors re: DIP Financing (2.1); update timeline re: same (0.9); emails with W&C re: DIP Financing document review (0.4); review documents re: preparation for Z. Jamal deposition (2.4); draft deposition outline re: same (1.1).	L Miranda	10.80	13,176.00
21 September 2025	Conduct substantive review of DIP Financing objection.	D Mago	2.90	2,871.00
21 September 2025	Conduct research re: DIP Financing precedent (2.2); prepare write up for S. Greissman (0.8); email summary to same (0.1); review DIP Financing declaration (0.1); email same to A. Zatz (0.1).	G Zahiremami	3.30	3,267.00
22 September 2025	Internal meeting to discuss DIP objection (0.5); review and revise DIP objection (2.7); teleconference with Alix re: declaration in support of DIP objection (0.6).	S Greissman	3.80	9,500.00
22 September 2025	Review and revise DIP Financing objection (1.9); confer with W&C team re: same (0.4); confer with Alix re: supporting testimony for DIP Financing objection (1.5); review and revise draft declaration (1.4); prepare for expert witness interviews (0.2); conduct same (0.7).	J Zakia	6.10	13,420.00
22 September 2025	Prepare for DIP Financing hearing (0.8); revise objection (2.6).	G Pesce	3.40	7,140.00
22 September 2025	Revising DIP Financing objection (6.7); revising DIP Financing declaration (0.5); call with Alix re: declaration (0.4); and related calls with S. Greissman (0.4).	A Zatz	8.00	16,800.00
22 September 2025	Telephone Creditors' Committee re: DIP Financing objection (0.6); review and edit objection (0.7); review and edit order (0.7); internal emails re: same (0.4); review declaration (0.3).	C Koster	2.70	5,130.00
22 September 2025	Call with Committee re: DIP Financing objection (0.5); call with Alix re: DIP Financing materials and diligence (1.5).	E Smith	2.00	3,260.00
22 September 2025	Review draft declaration for DIP Financing objection (0.2); attend call among W&C and Alix re: same (0.5); call with L. Miranda, E. Smith and Alix team re: DIP Financing budget (0.3); confer with A. Zatz and J. Yoo re: DIP Financing objection (0.4).	A Chase	1.40	2,212.00
22 September 2025	Revise DIP Financing declaration (1.5); revise DIP Financing objection (3.9); telephone conference with A. Zatz, J. Zakia and Alix team re: DIP Financing declaration and objection (1.0).	B Lingle	6.40	8,768.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 September 2025	Confer with W&C team re: DIP Financing objection.	J Yoo	0.30	411.00
22 September 2025	Review New DIP Financing obligor schedules & SOFAs re: DIP Financing objection collateral review (1.2); draft chart summarizing new value pledged by New DIP Financing Obligors re: same (2.0); analyze 1L credit agreement and 2L indenture re: same (1.6); analyze DIP Financing credit agreement re: same (0.8); draft chart summarizing assets no longer excluded under DIP Financing re: same (1.5); correspondence with G. Silnicki re: same (0.3); attend Creditors' Committee Call re: DIP Financing objection (0.5); conduct research re: same (1.7); conduct citation check re: same (1.0).	R Beil	10.60	13,568.00
22 September 2025	Call with Alix & W&C re: DIP Financing Budget (0.3); follow-up call with Alix & W&C re: diligence (0.2); call with W&C re: DIP Financing document review (0.3); review draft of DIP Financing objection (0.5); conduct legal research re: same (1.1); emails with W&C re: same (0.3).	L Miranda	2.70	3,294.00
22 September 2025	Revise DIP Financing objection per B. Lingle and A. Zatz comments (1.1); correspondence with W&C team re: same (0.1); continue substantive cite check (2.2); draft email analysis of cases cited in DIP Financing objection and send to B. Lingle (1.2).	D Mago	4.60	4,554.00
22 September 2025	Review and cite-check DIP Financing objection (2.8); conduct research re: same (2.7); prepare summary of findings and share with W&C team (0.3).	G Zahiremami	5.80	5,742.00
23 September 2025	Review and revise DIP Financing objection (2.5); review DIP Financing objection supporting declarations (0.5); correspondence and conference call with J. Zakia re: same (0.4); correspondence and conference call with A. Zatz re: same (0.4).	S Greissman	3.80	9,500.00
23 September 2025	Review and revise DIP Financing objection (5.0); confer with expert re: same (1.1).	J Zakia	6.10	13,420.00
23 September 2025	Prepare for DIP Financing hearing (0.8); revise objection (3.6).	G Pesce	4.40	9,240.00
23 September 2025	Revising DIP Financing objection (3.0); related call with Alix (0.3); and related correspondence with Alix (0.2).	A Zatz	3.50	7,350.00
23 September 2025	Review DIP Financing objection (0.7); internal emails re: same (0.3).	C Koster	1.00	1,900.00
23 September 2025	Review updated draft DIP Financing objection (1.1); assist with finalizing DIP Financing objection (1.6).	A Chase	2.70	4,266.00
23 September 2025	Attend telephone conference with A. Zatz, J. Zakia and Alix team re: DIP Financing objection and case runway (0.4); revise DIP Financing objection (3.9); revise DIP Financing declaration (2.8).	B Lingle	7.10	9,727.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 September 2025	Research re: SD Tex. DIP Financing orders (1.5); analyze and summarize certain decision re: same (0.5); draft and revise argument riders re: same (0.5); analyze precedent DIP Financing pleadings and decision re: same (1.8); finalize cash management objection re: same (0.8).	R Beil	5.10	6,528.00
23 September 2025	Draft objection to cash management motion (0.3); email with B. Lingle re: same (0.2); review exhibits to objection (0.2); email with W&C re: same (0.2); revise and revise DIP Financing objection (0.8); review exhibits to budget (0.2); email with B. Lingle re: DIP Financing objections (0.2).	L Miranda	2.10	2,562.00
23 September 2025	Legal research re: case law for DIP Financing objection (1.3); draft case analysis and send to B. Lingle re: same (0.4).	D Mago	1.70	1,683.00
24 September 2025	Review filed DIP Financing objection and declaration (1.2); teleconference and correspondence with G. Klidonas re: DIP Financing objection, hearing and case status (0.4); internal teleconference with C. Shore re: same (0.3); internal teleconference with A. Zatz re: same (0.3); internal teleconference with J. Zakia re: DIP Financing objection, hearing, case strategy and depositions (0.4).	S Greissman	2.60	6,500.00
24 September 2025	Prepare for DIP hearing.	G Pesce	2.80	5,880.00
24 September 2025	Revise sections of DIP Financing objection based on discovery.	E Smith	1.00	1,630.00
24 September 2025	Email re: witness and exhibits list for DIP Financing hearing.	L Miranda	0.60	732.00
25 September 2025	Develop strategy and tactics for DIP Financing hearing and related matters.	G Pesce	3.40	7,140.00
26 September 2025	Internal meeting re: DIP Financing objection and hearing.	S Greissman	0.80	2,000.00
26 September 2025	Review DIP Financing materials.	J Shore	0.70	1,750.00
26 September 2025	Prepare for final DIP Financing hearing.	J Zakia	0.40	880.00
26 September 2025	Analyze strategy and tactics for DIP Financing hearing and related matters.	G Pesce	3.40	7,140.00
26 September 2025	Draft DIP Financing objection sections.	E Smith	2.30	3,749.00
27 September 2025	Review DIP Financing documentation re: objection and hearing preparation.	S Greissman	2.50	6,250.00
27 September 2025	Prepare for DIP Financing hearing (0.8); address objection issues (3.6).	G Pesce	4.40	9,240.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 September 2025	Revise and draft DIP Financing objection riders re: discovery and schedule.	E Smith	1.30	2,119.00
27 September 2025	Call with J. Yoo and L. Miranda to prepare for DIP Financing hearing (0.2); review DIP Financing objection to prepare for upcoming hearing (1.1).	A Chase	1.30	2,054.00
27 September 2025	Draft cross outline for Z. Jamal for 9/30 hearing re: DIP Financing (4.1); email with J. Walz re: C. Shandler cross outline (0.2).	L Miranda	4.30	5,246.00
27 September 2025	Legal research re: potential litigation issue.	D Mago	0.80	792.00
28 September 2025	Prepare for final DIP Financing hearing.	J Zakia	2.10	4,620.00
28 September 2025	Prepare for DIP Financing hearing (0.8); address objection issues (3.6).	G Pesce	4.40	9,240.00
28 September 2025	Review DIP Financing objection and evidence (0.6); attend internal telephone conference re: same (0.4).	C Koster	1.00	1,900.00
28 September 2025	Emails with J. Yoo re: cross outlines for 9/30 hearing (0.2); review revised Z. Jamal cross outline (0.4).	L Miranda	0.60	732.00
28 September 2025	Legal research re: potential litigation issue (2.9); legal research re: precedent health care bankruptcy cases (1.4); draft email summary of findings to V. Sachdev re: potential litigation issue (0.4).	D Mago	4.70	4,653.00
29 September 2025	Review Debtors reply to the DIP Financing objection (1.2); review agent/lender reply to DIP Financing objection (1.3); review revised order (1.6).	S Greissman	4.10	10,250.00
29 September 2025	Preparation for DIP Financing hearing (4.5); calls and emails re: same (1.0); draft cross-examination (3.0).	J Shore	8.50	21,250.00
29 September 2025	Prepare for final DIP Financing hearing (7.4).	J Zakia	7.40	16,280.00
29 September 2025	Prepare for DIP Financing hearing (0.8); address objection issues (3.6).	G Pesce	4.40	9,240.00
29 September 2025	Reviewing replies to DIP Financing objection (2.0); and reviewing DIP Financing order precedent (0.2).	A Zatz	2.20	4,620.00
29 September 2025	Review DIP Financing replies.	C Koster	2.10	3,990.00
29 September 2025	Research and analyze Debtors cases re: Creditors' Committee investigation budget re: DIP Financing objection (0.5); draft chart of analysis re: same (0.7).	R Beil	1.20	1,536.00
29 September 2025	Meet with Alix & W&C to prepare for DIP Financing deposition and hearing (3.2); revise cross outlines for Z. Jamal and C. Shandler with comments from C. Shore (various iterations) (4.2); meet with C. Shore re: same (0.9); prepare for DIP Financing hearing with W&C (2.8); review Debtors' reply to Creditors'	L Miranda	12.20	14,884.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Committee objection on DIP Financing (0.6); review Consenting Creditors' reply to Creditors' Committee objection on DIP Financing (0.5).			
30 September 2025	Reviewing DIP Financing order language.	A Zatz	0.10	210.00
30 September 2025	Revise cross-outlines of Z. Jamal and C. Shandler for DIP Financing hearing with comments from C. Shore (2.6); meet with W&C to prepare for DIP Financing hearing (2.1); draft amended witness and exhibit list for DIP Financing hearing (0.2); email with D. Hirshorn re: same (0.1); discussion with A. Chase re: exhibits (0.4); discussion with C. Shore re: cross outlines and DIP Financing hearing (0.6); email with Alix re: DIP Financing hearing (0.4).	L Miranda	6.40	7,808.00
SUBTOTAL: DIP Financing & Cash Collateral			**445.50**	**728,581.00**

Discovery

9 September 2025	Calls and emails re: beginning of representation (2.1); review background materials (3.9); calls and emails re: scheduling (0.4); calls and emails re: discovery (0.5).	J Shore	6.90	17,250.00
9 September 2025	Review and revise draft discovery requests to Debtors.	A Chase	1.30	2,054.00
9 September 2025	Attend W&C litigation team call re: document requests and deposition notices (0.3); confer with E. Smith re: discovery (0.3); confer with W&C litigation team re: document requests and deposition notices (1.1); draft and revise document requests (2.7); draft and revise deposition notices (1.9); review Disclosure Statement, First Day Declaration, and other docket filings to assist with drafting discovery (1.4).	J Yoo	7.70	10,549.00
9 September 2025	Review and revise depositions notices and incorporate C. Shore's comments (1.6); review and revise requests for production to Debtors re: Plan, Disclosure Statement, and DIP Financing (1.1); review and revise deposition notices with comments from J. Yoo (1.7); emails with J. Yoo, A. Chase, and E. Smith re: discovery requests (0.2).	L Miranda	4.60	5,612.00
10 September 2025	Review discovery materials and correspondence with E. Smith (0.2); conference call with Paul Hastings team re: negotiations and time line (0.6).	S Greissman	0.80	2,000.00
10 September 2025	Calls re: discovery and scheduling.	J Shore	1.10	2,750.00
10 September 2025	Review and revise discovery requests (2.0); review discovery issues (0.6); confer with W&C team re: same (0.5).	J Zakia	3.10	6,820.00
10 September 2025	Revise Plan discovery and DIP Financing discovery (3.9); draft letter to counsel and send to Debtors re: same (1.4).	E Smith	5.30	8,639.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 September 2025	Review updated draft discovery requests (0.4).	A Chase	0.40	632.00
10 September 2025	Revise document requests (1.1); revise notices of deposition (0.8); confer with W&C team re: discovery (0.7).	J Yoo	2.60	3,562.00
10 September 2025	Review Rule 2004 requests precedent and local rules (1.1); emails with W&C re: same (0.2); draft Rule 2004 requests (1.4); review Disclosure Statement and public filings re: same (0.7).	L Miranda	3.40	4,148.00
11 September 2025	Calls re: discovery.	J Shore	0.80	2,000.00
11 September 2025	Review discovery issues (1.0); review correspondence re: same (0.5).	J Zakia	1.50	3,300.00
11 September 2025	Attend discovery call with L&W.	A Zatz	0.70	1,470.00
11 September 2025	Review discovery.	C Koster	0.30	570.00
11 September 2025	Review and revise potential discovery requests to serve (1.5); revise discovery slides for meeting with Creditors' Committee (0.2).	E Smith	1.70	2,771.00
11 September 2025	Call with E. Smith, J. Yoo, L. Miranda re: discovery work streams (0.5).	A Chase	0.50	790.00
11 September 2025	Attend call with W&C litigation team re: discovery (0.4); review and provide comments to Debtors' draft NDA (1.2); confer with W&C team re: draft NDA (0.3); confer with W&C litigation team re: discovery (0.6).	J Yoo	2.50	3,425.00
11 September 2025	Draft Rule 2004 requests (2.6); review Disclosure Statement and public filings re: same (0.8); call with A. Chase re: same (0.2); call with A. Chase, E. Smith and J. Yoo re: discovery (0.5).	L Miranda	4.10	5,002.00
12 September 2025	Review background materials (2.5); team calls (1.9); emails re: discovery (0.7); NDA review and emails (1.3); meet and confer re: discovery (0.5); calls re: pending motions (1.1).	J Shore	8.00	20,000.00
12 September 2025	Review correspondence re: discovery.	J Zakia	0.30	660.00
12 September 2025	Review public filings and team findings for investigation (2.0); prepare for meet and confer (1.0); attend meet and confer (1.0); revise discovery devices for potential service (1.0).	E Smith	5.00	8,150.00
12 September 2025	Revise draft Rule 2004 requests (1.3); call with L. Miranda re: meet and confer with Debtors (0.2); email among W&C team re: same (0.3).	A Chase	1.80	2,844.00
12 September 2025	Confer with W&C team re: discovery (0.4); attend meet and confer with Debtors' counsel (0.5); review second day pleadings re: meet and confer (0.8); confer with E.	J Yoo	2.00	2,740.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Smith re: second day pleadings discovery (0.3).			
12 September 2025	Revise Rule 2004s requests with comments from A. Chase (1.2): draft Rule 2004 requests for third parties (1.4); review Disclosure Statement, first day declaration and public filings re: same (1.3); call with Latham and W&C re: discovery requests and depositions (0.5); draft and circulate notes to W&C (0.3); emails with W&C re: same (0.1); call with A. Chase re: same (0.2).	L Miranda	5.00	6,100.00
13 September 2025	Correspondence re: discovery (0.6); review public filings and information re: Debtors business (1.0).	E Smith	1.60	2,608.00
13 September 2025	Review and revise Rule 2004 requests with comments from A. Chase (1.2); emails with W&C re: same (0.1).	L Miranda	1.30	1,586.00
15 September 2025	Conference call with G. Klidonas re: information flow and discovery.	S Greissman	0.40	1,000.00
15 September 2025	Email and calls re: discovery items (2.4); review first day motions and materials (1.5); team calls (1.1); NDA emails (0.9); expert call and follow up (1.0).	J Shore	6.90	17,250.00
15 September 2025	Attend meet and confer with opposing counsel re: discovery (1.0); outline key issues for first day objection and related depositions (1.4).	J Zakia	2.40	5,280.00
15 September 2025	Review discovery.	C Koster	0.10	190.00
15 September 2025	Review and revise protective order (0.9); attention second day discovery search parameters (1.5); prepare for Plan discovery meet and confer (1.0); attend meet and confer (1.0); calls (1.5) and correspondence (0.5) re: document review.	E Smith	6.40	10,432.00
15 September 2025	Email among W&C re: discovery to Debtors (0.6).	A Chase	0.60	948.00
15 September 2025	Review draft protective order (1.2); confer with W&C team re: protective order (0.3); attend meet and confer with Debtors' counsel (partial) (0.7); correspond with Debtors' counsel re: protective order (0.1).	J Yoo	2.30	3,151.00
15 September 2025	Attend meet and confer with Latham re: diligence (0.7); draft notes for W&C re: same (0.4); review diligence tracker (0.3); email with B. Kakani re: same (0.1); review precedent on diligence tracker and document review protocol (0.2); email to W&C re: document tracker, document review protocol and timeline (0.2).	L Miranda	1.90	2,318.00
15 September 2025	Create diligence tracker to monitor documents produced by Debtors.	B Kakani	0.50	435.00
15 September 2025	Review correspondence re: active workstreams (0.1); attend internal call with litigation team re: active workstreams (0.4); begin drafting DIP Financing document review protocol (1.8).	J Walz	2.30	2,001.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 September 2025	Send new matter cost approval (0.3); send workspace setup email (0.2) and send data processing email to case team (0.2).	K Chen	0.70	343.00
15 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload and folder items and run quality control (0.4).	G Chemborisov	1.50	735.00
16 September 2025	Conference call with Alix Partners re: diligence and financial information, expert testimony (0.6); review various correspondence re: discovery, litigation schedule and related (0.4).	S Greissman	1.00	2,500.00
16 September 2025	Preparation for hearing (3.0); team calls (0.7); review production materials (1.1); call re: DIP Financing budget and review of draft motions (0.5); review expert materials (0.9).	J Shore	6.20	15,500.00
16 September 2025	Review draft protective order (0.2); confer with W&C team re: same (0.3); review DIP Financing discovery issues (0.2).	J Zakia	0.70	1,540.00
16 September 2025	Calls with litigation team re: document review (1.7); call with Alix Partners re: same (1.0); calls and correspondence with Debtors counsel (1.1); review and assign project staffing (0.5); review document production issues (1.5).	E Smith	5.80	9,454.00
16 September 2025	Attend call with W&C litigation team re: discovery (0.5); review draft protective order (0.1); confer with W&C team re: protective order (0.1).	J Yoo	0.70	959.00
16 September 2025	Draft Plan document review protocol (1.3); review Debtors' production letters (0.1); review of initial document production for spot checking (1.3); draft notes re: same (0.2); draft DIP Financing document review protocol (3.8); email with W&C re: same (0.2); review summary of Debtors' document production re: DIP Financing prepared by B. Kakani (0.3).	L Miranda	7.20	8,784.00
16 September 2025	Draft case timeline in preparation for DIP discovery workstream.	A Aquije	2.10	2,331.00
16 September 2025	Confer with L. Miranda re: pincites re: document review protocol re: DIP Financing papers.	G Zahiremami	0.10	99.00
16 September 2025	Meet with E. Smith and A. Chase to discuss document review protocol (0.4); summarize documents received from Debtors in response to discovery requests (3.1).	B Kakani	3.50	3,045.00
16 September 2025	Meeting with litigation team re: active discovery workstreams (0.5); draft document review protocol (3.4).	J Walz	3.90	3,393.00
16 September 2025	Provide document review support (0.3); set up reviewer permissions management (0.3).	T Chen	0.60	294.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 September 2025	Quality control production load (0.9); coordinate with support team to create new EZManage matter entry (0.3); log received production for EID (0.3); populate parent dates for production documents (0.6); gather date range (0.3); create coding layout (0.5); email to case team re: access level for external financial adviser (0.4); set up new user group and permissions (0.9); add new user; send new user logon email (0.5).	K Chen	4.70	2,303.00
16 September 2025	Assist with setting up requested searches (0.7); add new users to workspace (0.3).	G Chemborisov	1.00	490.00
17 September 2025	Revise document review protocol memo (1.2); Meet with W&C team re: case background and document review expectations and answer team questions (1.5); coordination with Alix re: discovery (0.8); summarize productions to date (1.0); correspondence with Debtors counsel re: discovery (0.9).	E Smith	5.40	8,802.00
17 September 2025	Review and revise draft DIP document review protocol (1.9); call with E. Smith re: depositions for DIP hearing (0.2); call with J. Zakia re: same (0.2); meet with E. Smith re: same (0.3); meet with L. Miranda re: DIP depositions (0.6); email among W&C team re: document review for DIP documents (1.5); begin preparing for DIP depositions (2.7).	A Chase	7.40	11,692.00
17 September 2025	Revise document review DIP Financing protocol with comments from A. Chase and E. Smith (various iterations) (1.7); review diligence re: same (0.2); emails with A. Chase and E. Smith re: same (0.3); email with W&C litigation support team re: Relativity document review (0.3); spot check Relativity for document review (0.2); email with W&C re: document review (0.4); review documents to be sent to Alix (0.3); email with A. Aquije re: same (0.1); email to Alix re: production of documents (0.2).	L Miranda	3.70	4,514.00
17 September 2025	Review document review protocol in advance of DIP financing document review (0.8); document review re: DIP financing (4.6); draft summary email re: same (0.6); further revise timeline re: diligence received (0.6).	A Aquije	6.60	7,326.00
17 September 2025	Review email from E. Smith re: document production update re: DIP Financing and second day motions.	D Mago	0.10	99.00
17 September 2025	Review documents received by Debtors in response to discovery requests.	B Kakani	2.00	1,740.00
17 September 2025	Review and revise diligence timeline (0.4); discussion with L. Miranda re: same (0.2); correspondence with A. Aquije re: same (0.1); review certain documents re: same (0.1); review of document review protocol (0.5); review of produced documents (3.0); correspondence with G. Zahiremami re: same (0.1).	J Walz	4.40	3,828.00
17 September 2025	Quality control received production MODV_002 load (0.8); gather date range (0.2); release to case team	K Chen	3.30	1,617.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	with production specs (0.2); create new EID for new data (0.3); create searches and export PDFs (0.7); copy PDFs to case team network folder (0.2); add new issue tags and update coding panels (0.3); add new users (0.3); set up review batches and batch view (0.3).			
17 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4); Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
18 September 2025	Discovery emails (1.1); call re: Quinn (1.2).	J Shore	2.30	5,750.00
18 September 2025	Revise discovery materials.	G Pesce	0.90	1,890.00
18 September 2025	Review DIP Financing document review (2.0); correspondence with opposing counsel re: document productions (0.7).	E Smith	2.70	4,401.00
18 September 2025	Review and revise search terms for Plan documents (0.3); emails with A. Chase and E. Smith re: same (0.1); review and revise timelines re: same (0.5); review documents tagged hot from review team re: DIP Financing (2.3); call with W&C team re: same (0.4); review Board minutes for DIP Financing depositions (1.4); draft timeline re: same (0.4).	L Miranda	5.40	6,588.00
18 September 2025	Document review re: DIP financing (3.2); call with W&C team re: same (0.4); review document production from team re: same (0.4).	A Aquije	4.00	4,440.00
18 September 2025	Attend call with litigation team re: document review (0.6); conduct document review re: same (1.2).	G Zahiremami	1.80	1,782.00
18 September 2025	Meet with E. Smith to discuss discovery issues (0.4); review documents produced by Debtors in response to discovery requests (4.1).	B Kakani	4.50	3,915.00
18 September 2025	Add 3 external users and set up permissions (0.8); send new user emails (0.3).	K Chen	1.10	539.00
19 September 2025	Review production materials (1.2); discovery emails (0.8).	J Shore	2.00	5,000.00
19 September 2025	Calls with litigation team re: DIP Financing document review (0.8); review DIP Financing document production (2.3); review Plan discovery parameters (1.5); correspondence with Debtors counsel re: same (0.3).	E Smith	4.90	7,987.00
19 September 2025	Call among document review team re: DIP Financing document review (0.3); email document review team re: DIP Financing documents for depositions (1.8); review documents for DIP Financing depositions (3.8); begin drafting outline for DIP Financing deposition	A Chase	8.20	12,956.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(1.7); call with E. Smith and L. Miranda re: Plan discovery (0.6).			
19 September 2025	Attend W&C team call re: discovery (0.3).	J Yoo	0.30	411.00
19 September 2025	Review document review hot documents re: DIP Financing and DIP Financing budget (2.1); attend call re: DIP Financing objection with W&C (0.6); conduct legal research re: DIP Financing budget (1.9); revise section of DIP Financing objection (2.2); call with A. Chase and E. Smith (0.6); review additional Debtors' care package (0.7); email with Alix re: DIP Financing budget (0.1); attend W&C call re: DIP Financing document review (0.4); review documents to prepare for DIP Financing depositions (2.6); email with W&C re: Board minutes (0.2).	L Miranda	11.40	13,908.00
19 September 2025	Call with W&C team re: DIP Financing discovery.	A Aquije	0.30	333.00
19 September 2025	Attend call with litigation team re: document review (0.5); conduct document review (1.8); email to team re: same (0.1); conduct document review re: DIP Financing (0.4); confer with W&C team re: same (0.1).	G Zahiremami	2.90	2,871.00
19 September 2025	Review documents received by Debtors in response to discovery requests.	B Kakani	0.60	522.00
19 September 2025	Load production MODV_003 (0.9); quality control production load (0.9); gather stats and date range (0.3); release production to case team with stats (0.2); gather custodian info for case team (0.1); create searches for Alix group (0.4); quality control search security (0.2); create searchable PDF profile and provide instructions to case team (0.3).	K Chen	3.30	1,617.00
19 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4); Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
20 September 2025	Conference call with Alix team re: discovery, work product.	S Greissman	0.60	1,500.00
20 September 2025	Review document production.	E Smith	1.30	2,119.00
20 September 2025	Review first day declaration re: DIP Financing deposition preparation (1.4); continue drafting deposition outline (2.6); review documents re: same (2.1); confer with L. Miranda re: DIP Financing depositions (0.5).	A Chase	6.60	10,428.00
20 September 2025	Conduct second level review of responsive documents from DIP Financing objection (3.6); confer with A. Chase re: depositions preparation (0.5); review documents for deposition preparation of Z. Jamal (2.1).	L Miranda	6.20	7,564.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 September 2025	Document review re: DIP Financing.	A Aquije	1.70	1,887.00
20 September 2025	Review documents produced by Debtors in response to discovery requests.	B Kakani	1.70	1,479.00
20 September 2025	Provide document review support.	K Chen	0.40	196.00
21 September 2025	Calls and emails re: experts (0.5); review production (1.0).	J Shore	1.50	3,750.00
21 September 2025	Review DIP Financing document review (0.8); correspondence with Debtors re: document production (0.8).	E Smith	1.60	2,608.00
21 September 2025	Confer with L. Miranda re: DIP Financing depositions (0.5); continue drafting DIP Financing deposition outline (4.1); review documents re: same (3.6); email among W&C re: DIP Financing deposition preparation (0.4).	A Chase	8.60	13,588.00
21 September 2025	Confer with W&C team re: protective order and DIP Financing objection.	J Yoo	0.20	274.00
21 September 2025	Call with Alix & W&C re: DIP Financing objection (0.3); confer with A. Chase re: same (0.4).	L Miranda	0.70	854.00
21 September 2025	Document review re: DIP Financing discovery documents produced.	A Aquije	6.30	6,993.00
21 September 2025	Conduct document review re: DIP Financing (5.6); confer with W&C team re: same (0.2).	G Zahiremami	5.80	5,742.00
21 September 2025	Review documents produced by Debtors in response to discovery requests.	B Kakani	4.90	4,263.00
21 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4); Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
22 September 2025	Calls re: DIP objection and declaration (1.4); team calls and emails (3.0).	J Shore	4.40	11,000.00
22 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	0.80	1,680.00
22 September 2025	Discovery document review.	E Smith	2.00	3,260.00
22 September 2025	Call with L. Miranda, E. Smith and M. Gates (Alix) re: DIP Financing discovery (0.2); call among W&C team re: DIP Financing document review (0.3); call with J. Zakia re: DIP Financing deposition (0.2); confer with L. Miranda re: DIP Financing depositions (0.8); review and revise deposition outline for Z. Jamal (1.7); revise	A Chase	9.60	15,168.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	deposition outline for C. Shandler (3.8); review documents re: same (2.6).			
22 September 2025	Correspond with Debtors' counsel re: confidential designations.	J Yoo	0.20	274.00
22 September 2025	Conduct second level review of responsive documents for Second Day Hearing (1.2); draft outline for Z. Jamal deposition (4.4); review documents re: same, including hot documents, Z. Jamal's declaration, and DIP Financing Motion (2.8); review and revise Z. Jamal's deposition outline with comments from A. Chase and topic designation (1.6); review and revise C. Shandler deposition outline (0.9); conference with A. Chase re: depositions for DIP Financing hearing (0.5); call with E. Smith re: same (0.2).	L Miranda	11.60	14,152.00
22 September 2025	Document review re: DIP Financing documents produced (3.4); call with W&C team re: same (0.2); further revise credit agreement comparison chart re: same (1.9).	A Aquije	5.50	6,105.00
22 September 2025	Review current ModivCare document review protocols to prepare for pre-hearing depositions (0.5).	J Bourgault	0.50	435.00
22 September 2025	Prepare for meeting with B. Kakani and J. Walz re: DIP Financing discovery.	C Isaac	1.50	1,305.00
22 September 2025	Review documents produced by Debtors in response to discovery requests (2.5); prepare for 30(b)(6) depositions (0.8).	B Kakani	3.30	2,871.00
22 September 2025	Document review (8.1); call with associates' team re: same (0.3); prepare to lead call tomorrow with new joiners re: discovery (1.2).	J Walz	9.60	8,352.00
22 September 2025	Provide document review support.	T Chen	0.40	196.00
22 September 2025	Create searches for exported documents (0.7); export documents to PDF (0.6); copy to case team network folder (0.2); export and folder PDFs in families (0.8); quality control exports (0.2).	K Chen	2.50	1,225.00
22 September 2025	Assist with requested document population download (0.3); generate PDF files (0.4); run optical character recognition (0.3).	G Chemborisov	1.00	490.00
22 September 2025	Organize discovery documents for A. Aquije.	K Wick	0.60	294.00
23 September 2025	Calls and emails re: discovery and DIP Financing objection (1.0); review board materials (1.0); advisor call (0.5); review deposition materials (1.5).	J Shore	4.00	10,000.00
23 September 2025	Prepare for DIP depositions.	J Zakia	1.00	2,200.00
23 September 2025	Discovery document review (1.5); calls with W&C re: litigation and discovery updates (1.0); correspondence	E Smith	4.50	7,335.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	re: document production and DIP Financing depositions (2.0).			
23 September 2025	Email L. Miranda, J. Walz, J. Yoo re: DIP Financing cross-examination outline (0.9); continue preparing for DIP Financing depositions (2.3); draft document review protocol (4.2); review SEC filings re: same (0.7); email document review team re: upcoming discovery work streams (0.8); call with E. Smith re: same (0.3).	A Chase	9.20	14,536.00
23 September 2025	Confer with W&C team re: DIP Financing objection (0.4).	J Yoo	0.40	548.00
23 September 2025	Revise DIP Financing deposition outlines with comments from A. Chase (0.7); email with J. Zakia re: same (0.2); revise exhibits for DIP Financing depositions (0.4); review documents for depositions (2.2); email re: DIP Financing hot documents to J. Walz (0.4); conference with A. Chase re: same (0.6); coordinate DIP Financing depositions with B. Kakani (0.7); revise plan protocol (0.8); email with A. Chase re: same (0.2); call with A. Chase re: same (0.8).	L Miranda	7.00	8,540.00
23 September 2025	Draft document review protocol (2.5); draft outline response re: same (0.2); document review re: same (1.1).	A Aquije	3.80	4,218.00
23 September 2025	Attend strategy meeting for discovery document review in anticipation of upcoming depositions (0.5).	J Bourgault	0.50	435.00
23 September 2025	Review document review protocols and introduction documents (3.0); conference call with J. Walz and B. Kakani re: DIP Financing loan discovery (0.5).	C Isaac	3.50	3,045.00
23 September 2025	Prepare for 30(b)(6) depositions (2.4); review document review protocol (0.6).	B Kakani	3.00	2,610.00
23 September 2025	Conference with B. Kakani and J. Walz re: DIP loans and case strategy (0.5); Review protocol documents and DIP investigation (2.7).	A Quintana	3.20	2,784.00
23 September 2025	Preparation for call with new joiners re: discovery (0.2); call with new joiners re: discovery onboarding (0.5); finalize document review batch (0.5); consolidate hot documents from discovery ahead of depositions (0.3); review cross-examination background information (0.3); correspondence with A. Chase re: same (0.1); review produced documents (2.0).	J Walz	3.90	3,393.00
23 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4); Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
23 September 2025	Prepare deposition binders for J. Zakia (1.5); correspondence with L. Miranda re: same (0.2);	K Wick	2.60	1,274.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	organize discovery documents for L. Miranda (0.9).			
24 September 2025	Calls and email re: DIP Financing discovery (1.2); follow-up on deposition preparation and topics (0.6).	J Shore	1.80	4,500.00
24 September 2025	Prepare for depositions on DIP Financing objection.	J Zakia	6.80	14,960.00
24 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	0.80	1,680.00
24 September 2025	Review discovery emails.	C Koster	0.40	760.00
24 September 2025	Attention to DIP Financing document review (2.0); attention DIP Financing document production (0.6); assist with preparation for DIP Financing depositions (1.5).	E Smith	4.10	6,683.00
24 September 2025	Further revise DIP Financing document review protocol (3.8); confer among W&C re: outstanding DIP Financing discovery issues (1.6); prepare for DIP Financing depositions (3.9); email among document review team re: DIP Financing document review (1.6); call among document review team (0.2); email with Alix re: DIP Financing discovery (0.3); email among W&C re: Creditors' Committee DIP Financing discovery (0.5).	A Chase	11.90	18,802.00
24 September 2025	Prepare for deposition of Z. Jamal re: DIP Financing hearing (3.1); meet with J. Zakia re: same (0.8); email with B. Kakani re: deposition of Z. Jamal (0.3); review documents in relativity re: DIP Financing (2.2); run targeted searches re: same (0.4); meet with W&C litigation team re: document review (0.3); draft section of plan protocol for document review (3.8); email with A. Chase re: same (0.2).	L Miranda	11.10	13,542.00
24 September 2025	Review produced documents re: DIP Financing (2.0); call with W&C team re: same (0.5).	A Aquije	2.50	2,775.00
24 September 2025	Conduct document review re: DIP Financing (1.6); confer with W&C team re: same (0.2).	G Zahiremami	1.80	1,782.00
24 September 2025	Attend deposition strategy and preparation meeting in anticipation of document review (0.4).	J Bourgault	0.40	348.00
24 September 2025	Review Disclosure Statement and document review protocol re: transaction investigations (3.5); attend conference call with A. Chase and E. Smith re: transaction investigation and case progress (0.5).	C Isaac	4.00	3,480.00
24 September 2025	Prepare for 30(b)(6) depositions (2.1); review documents produced by Debtors in response to discovery requests (1.1).	B Kakani	3.20	2,784.00
24 September 2025	Conference with A. Chase and E. Smith re: DIP loans and case progress (0.5); Review DIP Financing document review protocol documents and Disclosure	A Quintana	0.80	696.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Statement for joint Chapter 11 Plan (0.3).			
24 September 2025	Document review (4.3); call with associates team re: document review (0.4).	J Walz	4.70	4,089.00
24 September 2025	Provide document review support.	T Chen	0.30	147.00
24 September 2025	Quality control production load (0.8); gather date range and stats (0.2); release production to case team (0.2); create batch search and batch out new documents for review (0.2); download MODV_006 (0.2); create evidence ID and log production data (0.3); load data to Relativity and quality control (0.5); release data load to case team (0.2); send cover letter to case team (0.1); coordinate adding new users to review database (0.2).	K Chen	2.90	1,421.00
24 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4); Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
24 September 2025	Organize discovery documents for L. Miranda (1.3); coordinate printing of documents for deposition (1.2).	K Wick	2.50	1,225.00
25 September 2025	Monitor Jamaal deposition (3.6); call with Z. Jamaal re: status (0.3).	S Greissman	3.90	9,750.00
25 September 2025	Follow-up on Jamal deposition (0.6); calls re: scheduling (0.4).	J Shore	1.00	2,500.00
25 September 2025	Prepare for (3.7); and conduct (2.3); Jamal deposition; prepare for Shandler deposition (2.6).	J Zakia	8.60	18,920.00
25 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.10	2,310.00
25 September 2025	Review Plan discovery.	E Smith	1.30	2,119.00
25 September 2025	Assist with deposition preparation for DIP Financing depositions (2.0); attend portion of Z. Jamal deposition (1.8); calls with Alix re: DIP Financing document production (0.7); review documents re: DIP Financing produced by Debtors (2.4); confer with J. Yoo re: Alix document production (0.3); revise C. Shandler deposition outline (1.8); call among W&C team re: DIP Financing documents review (0.3).	A Chase	9.30	14,694.00
25 September 2025	Attend call with AlixPartners re: discovery (0.3); confer with B. Kakani re: responses and objections (0.2).	J Yoo	0.50	685.00
25 September 2025	Call with W&C re: document review (0.4); meet with J. Zakia re: preparation for deposition of Z. Jamal (2.4); second chair deposition of Z. Jamal (3.9); meet with A. Chase and J. Zakia to prepare for deposition of C. Shandler (0.8); review documents for Z. Shandler	L Miranda	9.60	11,712.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	deposition (1.4); meet with A. Chase re: same (0.7).			
25 September 2025	Call with W&C re: ongoing discovery (0.3); revise diligence timeline (2.3).	A Aquije	2.60	2,886.00
25 September 2025	Prepare materials for discovery (1.0); confer with associates' team re: same (0.3).	G Zahiremami	1.30	1,287.00
25 September 2025	Review document review protocol and case background (1.1); Meet with W&C team re: discovery updates after depositions (0.1); Discuss discovery management & sorting assignment with J. Walz (0.2); Draft table compiling documents highly relevant to issues in litigation (0.7); Cross-reference relevant document lists for consolidation (2.3).	J Bourgault	4.40	3,828.00
25 September 2025	Prepare for 30(b)(6) depositions (0.6); draft responses and objections to Debtors' discovery requests (2.9).	B Kakani	3.50	3,045.00
25 September 2025	Conference with A. Chase and E. Smith re: DIP loans and deposition progress (0.3); Review matter background and DIP document review protocol (1.0).	A Quintana	1.30	1,131.00
25 September 2025	Review newly added documents (2.1); conduct further review of produced documents (0.3); call with associates' team re: document review and active workstreams (0.3); update hot documents chart (2.9); call with J. Bourgault re: same (0.2).	J Walz	5.80	5,046.00
25 September 2025	Provide document review support (0.3); provide document production support (0.3).	T Chen	0.60	294.00
25 September 2025	Quality control production load (0.8); release production to case team with production summary (0.2); confirm production format with case team (0.3); prepare and outline standard production formats (0.4); provide document review support (0.3); set up transform sets in database (0.5); create searches for case team (0.4).	K Chen	2.90	1,421.00
25 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4);Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
26 September 2025	Shandler deposition (2.5); internal correspondence and conference call with J. Zakia re: same (0.4).	S Greissman	2.90	7,250.00
26 September 2025	Calls and email re: discovery (0.5); hearing preparation (1.5); review Jamal deposition (0.5); calls re: Shandler (0.3).	J Shore	2.80	7,000.00
26 September 2025	Prepare for (2.9); and conduct (2.5); Shandler deposition; prepare for MacGreevey deposition (3.1).	J Zakia	8.50	18,700.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 September 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.40	2,940.00
26 September 2025	Plan meet and confer (0.1); review Plan discovery (1.9); participate in meet and confer (0.7).	E Smith	2.70	4,401.00
26 September 2025	Call with E. Smith to prepare for meet and confer (0.4); meet and confer with L&W re: DIP Financing discovery issues (0.5); discuss DIP Financing discovery with A. Hong (0.3); prepare for C. Shandler deposition with J. Zakia (2.0); attend C. Shandler deposition (2.1); call among W&C re: DIP Financing deposition and objections (0.4); review and revise responses and objections to DIP Financing discovery (0.8); coordinate among W&C re: DIP Financing discovery (1.1).	A Chase	7.60	12,008.00
26 September 2025	Review Plan document review protocol and diligence timeline.	A Hong	1.00	1,370.00
26 September 2025	Confer with W&C team re: document production in response to Debtors' document requests (0.3); confer with AlixPartners re: document production (0.2); revise responses and objections to Debtors' document requests (1.4); confer with W&C team re: responses and objections (0.2); prepare document production in response to Debtors' document requests (0.7).	J Yoo	2.80	3,836.00
26 September 2025	Email with A. Chase re: C. Shandler deposition (0.2); review and submit exhibits for deposition of C. Shandler (0.3); email with deposition vendor re: C. Shandler deposition (0.2); begin drafting cross-outline for Z. Jamal (2.7); emails with deposition vendor re: C. Shandler deposition (0.2); meet and confer with Latham re: Plan discovery (0.4); email with W&C litigation support re: Relativity (0.6).	L Miranda	4.60	5,612.00
26 September 2025	Assist with deposition preparation.	G Zahiremami	1.20	1,188.00
26 September 2025	Meet with A. Quintana to discuss discovery management assignment.	J Bourgault	0.20	174.00
26 September 2025	Organize documents from DIP Financing document review to correspond with case strategy.	C Isaac	2.60	2,262.00
26 September 2025	Organize hot documents to correspond with case strategy.	A Quintana	4.10	3,567.00
26 September 2025	Explain document organization task to J. Bourgault and A. Quintana.	J Walz	0.40	348.00
26 September 2025	Provide document review support (0.3); provide production support (0.1).	T Chen	0.40	196.00
26 September 2025	Release searches to case team (0.3); follow up email to case team re: upcoming productions and weekend coverage (0.3); confirm time zone with case team (0.2); coordinate Venio data processing database creation (0.3); download new documents (0.3); create	K Chen	5.70	2,793.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	EID (0.2); validate data (0.2); coordinate processing with tech team (0.3); quality control data load and release to case team (0.9); draft production form (0.6); add new tag and update coding panel per case team request (0.5); set up and create 2L review batches for received production (0.9); set up batch view and batch coding panel (0.7).			
26 September 2025	Review of data validation reports (0.2); Perform Quality control to ensure data integrity (0.3); Error handling of problematic files (0.3); Stage/normalize data for importing (0.3); Status update reports for W&C team (0.2); Unzip Production (0.2); decrypt and extract (0.2); run quality control analysis (0.2); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment, upload (0.2).	G Chemborisov	2.50	1,225.00
26 September 2025	Prepare documents for discovery re: Project Emcee (0.8); Upload files to Relativity in preparation of review (0.2).	M Magnaye	1.00	420.00
27 September 2025	Prepare for MacGreevey deposition (0.8); review potential deposition exhibits (1.0).	J Zakia	1.80	3,960.00
27 September 2025	Attention to document review.	E Smith	1.00	1,630.00
27 September 2025	Confer with J. Yoo re: Creditors' Committee document production for DIP Financing hearing.	A Chase	0.30	474.00
27 September 2025	Review documents for production in response to Debtors' document requests (2.3); confer with W&C team re: document production (0.4); prepare and send production to Debtors' counsel (0.3).	J Yoo	3.00	4,110.00
27 September 2025	Review deposition transcript and exhibits re: same (1.4); email with J. Yoo re: same (0.2); call with A. Chase and J. Yoo re: same (0.3).	L Miranda	1.90	2,318.00
27 September 2025	Draft cross-examination outline for C. Shandler (4.5).	J Walz	4.50	3,915.00
27 September 2025	Acknowledge and coordinate new document processing (0.4); create production searches (1); run conflict searches (0.7); create production set (0.3); modify production population and update production form per case team (0.4); update production searches and clear conflict checks (0.3); update production set (0.2); bates stamp (0.2); export production data and run production creator quality control (0.9); release production to case team with production summary (0.3); create new ftp site for production and add users (0.3); encrypt production and upload to ftp (0.3).	K Chen	5.30	2,597.00
27 September 2025	Review of data validation reports (0.2); Perform Quality control to ensure data integrity (0.3); Error handling of problematic files (0.3); Stage/normalize data for importing (0.2); Status update reports for W&C team (0.2); Unzip Production (0.2); decrypt and extract (0.2); run quality control analysis (0.1); move to staged environment (0.1); prepare for upload (0.1); map	G Chemborisov	2.00	980.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	metadata fields to Relativity environment, upload (0.1).			
28 September 2025	Review Jamal and Shandler deposition transcript (4.4); calls re: same (0.6); prepare DIP Financing witness crosses (2.0).	J Shore	7.00	17,500.00
28 September 2025	Review Z. Jamal deposition (2.7); review D. MacGreevey declaration (0.5); draft outline for D. MacGreevey DIP Financing deposition preparation (3.4); review draft cross outlines from DIP Financing depositions (0.9).	A Chase	7.50	11,850.00
28 September 2025	Review transcript of Jamal deposition (0.7); review and revise Jamal cross exam outline (1.9); review transcript of Shandler deposition (0.6); review and revise Shandler cross exam outline (1.6).	J Yoo	4.80	6,576.00
28 September 2025	Further revise C. Shandler cross-examination outline (0.9); finalize hot documents tracking system (0.2).	J Walz	1.10	957.00
28 September 2025	Unzip Production, decrypt and extract (0.5); run quality control analysis, move to staged environment (0.3); prepare for upload, map metadata fields to Relativity environment (0.3); upload, folder items, run quality control (0.4);Set up and run requested searches (0.3); generate reports (0.2).	G Chemborisov	2.00	980.00
29 September 2025	Prepare for (1.8); and defend MacGreevey deposition (1.6).	J Zakia	3.40	7,480.00
29 September 2025	Prepare for D. MacGreevey deposition.	C Koster	0.50	950.00
29 September 2025	Attention Plan discovery.	E Smith	1.20	1,956.00
29 September 2025	Meet with D. MacGreevey to prepare for DIP Financing deposition (4.6); attend D. MacGreevey deposition re: DIP Financing (2.2).	A Chase	6.80	10,744.00
29 September 2025	Assist with direct exam outline and confer with W&C team re: same (0.6); confer with W&C team re: cross examination preparation (0.3).	J Yoo	0.90	1,233.00
29 September 2025	Review search term hit report for Plan document review (0.2); email with W&C re: Plan document review (0.2).	L Miranda	0.40	488.00
29 September 2025	Document review re: board materials.	A Aquije	0.70	777.00
29 September 2025	Revise Z. Jamal cross outline (0.9); coordinate exhibits for second day hearing (1.1); review second set of documents for investigation (6.2); draft direct outline (0.7); research on C. Shandler's role with the debtors (0.3).	J Walz	9.20	8,004.00
29 September 2025	Provide document review support.	T Chen	0.30	147.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 September 2025	Quality control production load (0.9); gather date range (0.2); release production to case team with production summary (0.3); provide document support to case team (0.5).	K Chen	1.90	931.00
29 September 2025	Assist with production upload (0.5); map metadata and run optical character recognition (0.4); update index (0.2); set up requested searches (0.9).	G Chemborisov	2.00	980.00
30 September 2025	Attention to discovery work streams (1.3); correspondence re: discovery (0.4).	E Smith	1.70	2,771.00
30 September 2025	Document review re: board materials.	A Aquije	0.20	222.00
30 September 2025	Review documents produced by Debtors in response to discovery requests.	B Kakani	1.50	1,305.00
SUBTOTAL: Discovery			**630.50**	**866,612.00**

Exclusivity, Plan & Disclosure Statement

9 September 2025	Attend internal strategy calls.	A Zatz	3.00	6,300.00
9 September 2025	Begin reviewing background material re: Plan and Disclosure Statement.	A Chase	2.20	3,476.00
10 September 2025	Review first day declaration for description of company background and RSA .	A Chase	1.30	2,054.00
16 September 2025	Review and analyze Disclosure Statement.	A Chase	4.70	7,426.00
16 September 2025	Review Disclosure Statement (0.4) and Plan (0.3) re: diligence memo.	A Aquije	0.70	777.00
22 September 2025	Confer with B. Lingle re: Disclosure Statement precedent (0.1); locate same and email to same (0.4).	G Zahiremami	0.50	495.00
23 September 2025	Review Disclosure Statement objection precedent.	B Lingle	0.20	274.00
24 September 2025	Review plan materials.	J Shore	1.40	3,500.00
24 September 2025	Review Disclosure Statement and related materials.	V Sachdev	0.40	568.00
24 September 2025	Attend telephone conference with E. Smith re: Disclosure Statement objection.	B Lingle	0.40	548.00
24 September 2025	Assist in drafting of objection to Disclosure Statement.	D Mago	1.40	1,386.00
25 September 2025	Draft Disclosure Statement objection.	B Lingle	1.70	2,329.00
25 September 2025	Analyze voting and solicitation procedures re: Disclosure Statement motion objection (1.5); research in support of Disclosure Statement motion objection (1.3).	R Beil	2.80	3,584.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 September 2025	Draft Disclosure Statement objection.	B Lingle	3.00	4,110.00
26 September 2025	Research solicitation and voting procedures re: Disclosure Statement objection (1.5); research equity rights offerings in support of Disclosure Statement objection (3.8).	R Beil	5.30	6,784.00
26 September 2025	Review and revise Disclosure Statement (1.4); email with B. Lingle re: same (0.1); call with B. Lingle re: same (0.2).	L Miranda	1.70	2,074.00
26 September 2025	Conduct research re: Disclosure Statement objection (2.2); confer with W&C team re: same (0.1).	G Zahiremami	2.30	2,277.00
27 September 2025	Correspond with A. Zatz and L. Miranda re: Disclosure Statement objection (0.5); review research re: same (0.6).	B Lingle	1.10	1,507.00
27 September 2025	Conduct research on Disclosure Statement to respond to A. Zatz (1.6): email with B. Lingle re: same (0.3); email to W&C re: legal research on Disclosure Statement objection (0.3); review research by D. Mango re: third party releases (0.7).	L Miranda	2.90	3,538.00
27 September 2025	Legal research re: Disclosure Statement objection.	D Mago	1.30	1,287.00
28 September 2025	Revising Disclosure Statement objection.	A Zatz	2.50	5,250.00
28 September 2025	Revise Disclosure Statement objection (1.0); attend telephone conference with A. Zatz re: same (0.3).	B Lingle	1.30	1,781.00
28 September 2025	Review and revise Disclosure Statement objection (2.1); conduct legal research re: same (0.6); conduct legal research re: equity rights offering (0.7); review research by G. Zahiremami re: same (1.3); review local rules re: emergency hearing (0.8); email with B. Mingle re: same (0.3); draft responses to A. Zatz's questions re: Disclosure Statement (0.7).	L Miranda	6.50	7,930.00
29 September 2025	Revising Disclosure Statement objection.	A Zatz	1.80	3,780.00
29 September 2025	Revise Disclosure Statement objection and discuss with B. Lingle, A. Zatz.	E Smith	1.00	1,630.00
29 September 2025	Review ModivCare Disclosure Statement and Plan.	A Hong	1.50	2,055.00
29 September 2025	Revise Disclosure Statement objection.	B Lingle	3.00	4,110.00
29 September 2025	Research re: Disclosure Statement objection (2.0); draft and revise objection re: same (0.5).	R Beil	2.50	3,200.00
29 September 2025	Legal research re: Disclosure Statement (3.0); draft email to B. Lingle, M. Loredana, R. Beil, and G. Zahiremami re: same (0.2).	D Mago	3.20	3,168.00
29 September 2025	Conduct research re: unencumbered assets (2.2);	G Zahiremami	2.90	2,871.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	email to B. Lingle re: same (0.1); conduct research re: recharacterization language (0.5); email to B. Lingle re: same (0.1).			
30 September 2025	Internal call re: Disclosure Statement objection.	A Zatz	0.20	420.00
30 September 2025	Calls re: Disclosure Statement objection and declaration (2.0); draft Disclosure Statement declaration (4.5).	E Smith	6.50	10,595.00
30 September 2025	Call with E. Smith re: Disclosure Statement objection (0.2); review correspondence re: Plan discovery (0.5); draft declaration in support of Disclosure Statement objection (2.0); emails with E. Smith re: Disclosure Statement objection, declaration, and exhibits (0.1).	A Hong	2.80	3,836.00
30 September 2025	Revise Disclosure Statement objection (1.2); telephone conference with E. Smith, Alix team re: Disclosure Statement objection and declaration (0.4).	B Lingle	1.60	2,192.00
30 September 2025	Conduct critical vendor research re: Disclosure Statement objection (0.7); conduct cite check of dollar figures re: same (0.5); analyze E. Smith edits re: same (0.3); draft and revise objection re: same (0.5).	R Beil	2.00	2,560.00
30 September 2025	Conduct legal research re: adequate disclosure in Disclosure Statement (1.6); email with B. Lingle re: same (0.2).	L Miranda	1.80	2,196.00
30 September 2025	Review valuation analysis (0.2); correspondence with B. Lingle re: same (0.1).	D Mago	0.30	297.00
30 September 2025	Conduct research re: Disclosure Statement objection (1.2); email to B. Lingle re: same (0.1).	G Zahiremami	1.30	1,287.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement			**81.00**	**113,452.00**

Executory Contracts & Unexpired Leases

17 September 2025	Analyze omnibus lease rejection motion (0.6); legal research re: omnibus lease rejection precedent (0.5); draft email to D. Litz re: omnibus lease rejection analysis (0.2).	D Mago	1.30	1,287.00
28 September 2025	Conduct research re: deemed rejection (3.8); draft summary re: same (1.6); email same to B. Lingle and L. Miranda (0.1).	G Zahiremami	5.50	5,445.00
SUBTOTAL: Executory Contracts & Unexpired Leases			**6.80**	**6,732.00**

Hearings & Court Matters

15 September 2025	Correspondence with the court.	C Koster	0.30	570.00
18 September 2025	Prepare for critical vendors hearing (3.0); critical vendors hearing and follow up (1.5).	J Shore	4.50	11,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 September 2025	Prepare for hearing on emergency motion (0.5); confer with C. Shore re: same (0.1); attend hearing on emergency motion (1.3).	J Zakia	1.90	4,180.00
18 September 2025	Attending critical vendors hearing.	A Zatz	0.50	1,050.00
18 September 2025	Assist with hearing preparation and hearing.	E Smith	1.20	1,956.00
18 September 2025	Attend emergency hearing for vendor payments (0.5).	A Chase	0.50	790.00
18 September 2025	Attend critical vendor hearing.	B Lingle	0.50	685.00
18 September 2025	Attend hearing on September 18 virtually re: emergency motion.	D Mago	0.40	396.00
25 September 2025	Prepare for DIP Financing hearing, including review and objection, DIP Financing order and related.	S Greissman	1.60	4,000.00
25 September 2025	Revise witness & exhibit list for DIP Financing hearing (1.1); email with W&C re: same (0.2).	L Miranda	1.30	1,586.00
25 September 2025	Draft witness and exhibit list (0.2); upload exhibits (0.2).	A Aquije	0.40	444.00
26 September 2025	Prepare for DIP Financing hearing.	S Greissman	1.80	4,500.00
26 September 2025	Emails internal re: witness & exhibit list.	C Koster	0.30	570.00
26 September 2025	Review and revise witness and exhibit list (0.6); email among W&C and LW re: same (0.5).	A Chase	1.10	1,738.00
26 September 2025	Review and revise witness and exhibit list for DIP Financing hearing (1.4); review exhibits re: same (0.4); emails with W&C re: same (0.3).	L Miranda	2.10	2,562.00
26 September 2025	Review and respond to emails with L. Miranda re: filing of witness and exhibit list (0.2); review and finalize exhibits (1.7); confer with L. Miranda re: filing exhibits under seal (0.1); review and revise amended witness and exhibit list (0.1); finalize and file amended exhibit list with exhibits (0.3); file sealed exhibits (0.4); electronically serve witness and exhibit list (0.1).	Hirshorn, Deanna	2.90	1,421.00
27 September 2025	Prepare for hearing (0.5).	C Koster	0.50	950.00
28 September 2025	Prepare for hearing.	C Koster	0.50	950.00
29 September 2025	Prepare for DIP Financing hearing.	S Greissman	4.50	11,250.00
29 September 2025	Prepare for hearing.	C Koster	3.00	5,700.00
29 September 2025	Assist with hearing preparation.	E Smith	0.60	978.00
29 September 2025	Draft direct outline for D. MacGreevey testimony re: DIP Financing (1.7); confer with W&C and Alix to	A Chase	6.50	10,270.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	prepare for DIP Financing hearing (4.8).			
29 September 2025	Prepare Committee Exhibits binder (0.5); confer with K. Wick re: hearing binders and printing in Houston (0.1).	Hirshorn, Deanna	0.60	294.00
29 September 2025	Prepare hearing materials (2.9); coordinate printing of same (0.7); await final changes (0.5); edit hearing materials accordingly (1.5); correspondence with L. Miranda re: same (0.6); calls with vendor re: same (1.0).	K Wick	7.20	3,528.00
30 September 2025	Prepare for DIP Financing hearing (0.6); attend DIP Financing hearing (5.5); internal meeting re: follow up and next steps (1.5).	S Greissman	7.60	19,000.00
30 September 2025	Preparation for DIP Financing hearing (6.0); attend DIP Financing hearing (6.0); attend team meetings (1.5); emails re: scheduling (0.5).	J Shore	14.00	35,000.00
30 September 2025	Prepare for (6.1); and participate in (5.1); final DIP Financing hearing.	J Zakia	11.20	24,640.00
30 September 2025	Attending DIP Financing hearing (3.5); related correspondence with G. Pesce (0.1); related internal correspondence (0.1).	A Zatz	3.70	7,770.00
30 September 2025	Attend hearing (6.0); prepare for hearing (2.7).	C Koster	8.70	16,530.00
30 September 2025	Prepare with W&C and Alix team for DIP Financing hearing (5.9); participate in DIP Financing hearing (5.6); confer among W&C and Alix team re: DIP Financing hearing closings (1.4).	A Chase	12.90	20,382.00
30 September 2025	Attend Second Day Hearing.	V Sachdev	2.40	3,408.00
30 September 2025	Prepare for (0.3); and attend (2.4); DIP Financing hearing.	B Lingle	2.70	3,699.00
30 September 2025	Prepare for DIP Financing hearing.	J Bourgault	1.70	1,479.00
30 September 2025	Attend hearing.	J Walz	2.30	2,001.00
30 September 2025	Review and respond to emails from L. Miranda and A. Aquije re: service of Committee's sealed witness and exhibit list (0.1); send Committee's sealed witness and exhibit list through secure file to certain parties (0.2); Confer with L. Miranda re: filing updated witness and exhibit list (0.3); finalize and file amended witness and exhibit list (0.3); electronically serve same (0.1).	Hirshorn, Deanna	1.00	490.00
SUBTOTAL: Hearings & Court Matters			**112.90**	**206,017.00**

Investigation of Causes of Action

11 September 2025	Attend internal call re: lien review.	A Zatz	0.40	840.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 September 2025	Conference with R. Beil and L. Miranda re: lien review (0.3); review workstreams re: same (0.9).	B Lingle	1.20	1,644.00
11 September 2025	Review care package sent by Debtors (1.1); call with J. Walz and E. Smith re: factual research on Debtors (0.4); meet with J. Walz re: same (0.2).	L Miranda	1.70	2,074.00
11 September 2025	Meeting with B. Lingle and R. Beil re: collateral review (0.4); follow-up meeting with R. Beil re: same (0.2).	L Miranda	0.60	732.00
11 September 2025	Conduct background organizational research on company and possible causes of action.	J Walz	3.20	2,784.00
12 September 2025	Comment on Alix's diligence tracker.	A Zatz	0.30	630.00
12 September 2025	Review of debt documents (2.0); discussions re: same (0.2).	G Silnicki	2.20	3,234.00
12 September 2025	Attend call with L. Miranda, R. Parm and G. Silnicki re: collateral review and lien investigation.	R Beil	0.30	384.00
12 September 2025	Email to A. Bagdasarian re: IP collateral review (0.4); email with P. Rai and R. Beil re: collateral review (0.2); review debt documents re: collateral review (1.1); email to D. Litz and B. Lingle re: collateral review (0.1); call with P. Rai, R. Beil, and G. Silnicki re: collateral review and memorandum (0.4); draft collateral review chart (0.5); review precedent re: same (0.4); review Disclosure Statement and public filings re: collateral review (0.6); initial review of lien searches re: same (0.6); emails with P. Rai and G. Silnicki re: same (0.1).	L Miranda	4.40	5,368.00
12 September 2025	Review of credit and security documents (2.0); Call with P. Rai, R. Beil, and G. Silnicki re: collateral review and memorandum (0.4).	P Rai	2.40	2,664.00
12 September 2025	Correspondence with L. Miranda re: lien review.	K Wick	0.20	98.00
14 September 2025	Review diligence re: uptier transaction (0.7); review Alix diligence list (0.2); emails with W&C re: diligence (0.3).	L Miranda	1.20	1,464.00
15 September 2025	Discussion re: security documents/lien investigation (0.5); review of debt documents (0.7); review of lien searches (0.4); review of company structure (0.3).	G Silnicki	1.90	2,793.00
15 September 2025	Meeting with A. Zatz re: unencumbered assets.	D Litz	0.30	411.00
15 September 2025	Analyze 1L credit agreement re: collateral review and lien investigation (1.0); analyze 2L indenture re: same (0.8); analyze 1L and 2L subsidiary guarantees (1.0) and note prepetition obligors v. DIP Financing obligors (0.4) re: same; analyze collateral review precedent re: collateral review call (1.0); attend call re: same (0.7).	R Beil	4.90	6,272.00
15 September 2025	Attend call with W&C re: collateral review (0.5); emails with R. Pai re: same (0.2); meet with R. Beil re: same	L Miranda	0.90	1,098.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.2).			
15 September 2025	Review Debtors' VDR (0.3); review diligence re: Q1 2025 transactions (0.7).	L Miranda	1.00	1,220.00
15 September 2025	Further review credit agreement and security agreements (1.4); summarize same (0.5); prepare supplemental document request list (0.5); attend call with W&C re: collateral review (0.5).	P Rai	2.90	3,219.00
15 September 2025	Review of lien search results.	C Slattery	6.40	4,480.00
16 September 2025	Discussion re: lien search strategy and collateral review (0.5); discussion re: assets with AlixPartners (0.3); review of debt document provisions re: pledged assets (0.3); correspondence re: lien search strategy considerations (0.1).	G Silnicki	1.20	1,764.00
16 September 2025	Analyze 1L credit agreement re: collateral review and lien investigation (0.8); analyze 2L indenture re: same (0.4); attend call with Alix re: same (0.3).	R Beil	1.50	1,920.00
16 September 2025	Attend call with W&C and Alix re: collateral review (0.3); emails with W&C re: same (0.2).	L Miranda	0.50	610.00
16 September 2025	Attend call with W&C and Alix re: collateral review (0.3); Attend call with C. Slattery and G. Silnicki re: lien search review and issues (0.5); review of lien searches (0.6).	P Rai	1.40	1,554.00
16 September 2025	Review lien search matters.	C Slattery	4.10	2,870.00
17 September 2025	Attend telephone conference with Alix team re: unencumbered assets.	B Lingle	0.80	1,096.00
17 September 2025	Attend call with W&C and Alix on unencumbered assets re: collateral review and lien investigation.	R Beil	0.80	1,024.00
17 September 2025	Call with W&C and Alix teams re: unencumbered assets.	G Zahiremami	0.50	495.00
18 September 2025	Review of asset schedules.	G Silnicki	1.40	2,058.00
19 September 2025	Correspondence re: unencumbered assets (0.2); related review of transaction materials (0.2).	G Silnicki	0.40	588.00
21 September 2025	Correspondence re: DIP Financing obligors and collateral.	G Silnicki	0.20	294.00
21 September 2025	Review debt finance analysis of excluded assets, schedules and SOFAs re: collateral review and lien challenge.	R Beil	2.00	2,560.00
21 September 2025	Review of Debtors' schedules of assets and liabilities schedules (1.6); drafting excluded collateral summary (1.3); review of security documents and related	P Rai	3.90	4,329.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	schedules/exhibits (1.0).			
22 September 2025	Review patent reports re: IP collateral review (0.9); review trademark report re: IP collateral review (3.0); attend internal conference call (0.6).	A Bagdasarian	4.50	7,110.00
22 September 2025	Review and revision of summary re: prepetition and DIP Financing obligors and collateral and preparation of additional related notes on assets (1.6); review of asset schedules and related correspondence (2.3); review asset-related queries from restructuring team and preparation of responses (0.8).	G Silnicki	4.70	6,909.00
22 September 2025	Revise excluded collateral summary (0.2); review of DIP Financing security (0.7).	P Rai	0.90	999.00
22 September 2025	Review of lien searches.	C Slattery	4.10	2,870.00
23 September 2025	Review copyright report re: IP collateral review (0.5); continue review of trademark reports re: IP collateral review (3.8).	A Bagdasarian	4.30	6,794.00
23 September 2025	Research in support of potential causes of action (0.3).	A Quintana	0.30	261.00
23 September 2025	Review of lien searches.	C Slattery	6.80	4,760.00
25 September 2025	Call with A. Chase re: uptier and lien challenge (0.1); research re: same (0.2); call with D. Mago re: same (0.2); confer with C. Koster re: same (0.1); review correspondence from D. Hirshorn re: same (0.1); call with A. Zatz re: same (0.2); call with E. Smith and A. Zatz re: same (0.9); call with D. Mago re: timing (0.3); call with D. Mago and C. Isaac re: timing and related research (0.3); correspondence with D. Mago and C. Isaac re: same (0.2); call with D. Mago re: same (0.2); draft email summary of same and confer with A. Zatz, E. Smith, C. Isaac and D. Mago re: same (1.7).	V Sachdev	4.50	6,390.00
25 September 2025	Legal research in support of potential causes of action (1.6); draft summary email to V. Sachdev re: same (0.6).	D Mago	2.20	2,178.00
25 September 2025	Legal research re: adversary proceedings.	C Isaac	4.20	3,654.00
25 September 2025	Research adversary complaint timeline question for D. Mago (0.8); email D. Mago and V. Sachdev re: same (0.2).	Hirshorn, Deanna	1.00	490.00
26 September 2025	Internal call re: lien review.	A Zatz	0.40	840.00
26 September 2025	Discussion re: lien and collateral review (0.3); correspondence re: lien review findings (0.2).	G Silnicki	0.50	735.00
26 September 2025	Call with R. Beil re: lien review (0.2); call with lien review team re: status (0.3).	V Sachdev	0.50	710.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 September 2025	Review materials re: uptier.	V Sachdev	0.40	568.00
26 September 2025	Call with V. Sachdev re: collateral review and lien challenge (0.1); call with W&C collateral review team re: same (0.2).	R Beil	0.30	384.00
26 September 2025	Internal W&C meeting to discuss status of collateral review.	P Rai	0.20	222.00
27 September 2025	Reviewing Disclosure Statement Motion (1.6); related correspondence (0.2); and related call with S. Greissman (0.3).	A Zatz	2.10	4,410.00
27 September 2025	Review lien challenge materials and research re: same (2.3); preparation for and lead call with R. Beil, G. Zahiremami, and D. Mago re: same (0.8); correspondence with R. Beil and D. Mago re: same (0.1); correspondence with A. Chase and E. Smith re: same (0.1); draft outline of standing motion and complaint (1.5); correspondence with A. Zatz re: same (0.1).	V Sachdev	4.90	6,958.00
27 September 2025	Review V. Sachdev outline re: lien challenge complaint (0.1); coordinate workstreams re: same (0.2); conduct potential litigation issue research re: same (0.7).	R Beil	1.00	1,280.00
27 September 2025	Review potential litigation issue research in preparation of call re: lien challenge complaint (0.7); attend W&C call re: same (0.5).	R Beil	1.20	1,536.00
27 September 2025	Legal research re: adversary cases (0.6); meeting with V. Sachdev, R. Veil, G. Zahiremami re: adversary complaint (0.6); research precedent (3.1).	D Mago	4.30	4,257.00
27 September 2025	Call with V. Sachdev re: lien challenge (0.4); conduct research re: precedent (0.9); email same to team (0.1); conduct further research re: potential litigation issue (2.3).	G Zahiremami	3.70	3,663.00
28 September 2025	Draft outline for lien challenge standing motion and complaint (2.6); correspond with D. Mago, R. Beil and G. Zahiremami re: same (0.1); correspond with A. Zatz re: same (0.1).	V Sachdev	2.80	3,976.00
29 September 2025	Review uptier challenge materials.	V Sachdev	0.30	426.00
29 September 2025	Review V. Sachdev outline re: lien challenge complaint (0.1); coordinate workstreams re: same (0.2); conduct statutory research re: same (0.7).	R Beil	1.00	1,280.00
29 September 2025	Provide case citations to support argument re: section of complaint.	D Mago	0.30	297.00
29 September 2025	Conduct research re: lien challenge (3.7); emails to W&C team re: same (0.1).	G Zahiremami	3.80	3,762.00
29 September 2025	Review of lien searches.	C Slattery	1.80	1,260.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 September 2025	Prepare shell of complaint for R. Beil.	K Wick	0.90	441.00
30 September 2025	Analyze first lien credit agreement re: standing motion (1.0); analyze DIP Financing credit agreement re: same (1.0); analyze cash management motion re: same (1.3); analyze debt finance memo re: same (0.6); conduct potential litigation issue research re: same (1.2); draft and revise standing motion re: same (3.2).	R Beil	8.30	10,624.00
30 September 2025	Drafting lien search summaries.	C Slattery	2.50	1,750.00
SUBTOTAL: Investigation of Causes of Action			**133.80**	**154,365.00**

Non-Working Travel

29 September 2025	Travel to Houston for DIP Financing hearing (billed at half time).	S Greissman	0.30	750.00
29 September 2025	Travel to Houston (billed at half time).	J Shore	2.00	5,000.00
29 September 2025	Non-working travel to DIP Financing hearing (billed at half time).	L Miranda	2.30	2,806.00
SUBTOTAL: Non-Working Travel			**4.60**	**8,556.00**

Professional Retention & Fees - W&C

11 September 2025	Review retention issues and correspondence with A. Zatz and D. Litz.	S Ludovici	0.20	222.00
14 September 2025	Email to D. Litz re: retention application.	G Zahiremami	0.20	198.00
16 September 2025	Call re: W&C retention app.	D Litz	0.50	685.00
16 September 2025	Attend meeting with G. Zahiremami re: conflicts and retention (0.4); internal correspondence on process re: same (0.2).	R Beil	0.60	768.00
16 September 2025	Call with G. Pesce and team re: retention (0.3); begin drafting retention application (1.6); confer with R. Beil re: same (0.3).	G Zahiremami	2.20	2,178.00
16 September 2025	Set up billing codes (0.3); prepare for fee applications (0.3); draft timekeeping memo (0.4).	S Ludovici	1.00	1,110.00
17 September 2025	Review Debtors parties in interest list re: W&C retention (0.3); correspondence with G. Zahiremami re: same (0.2).	R Beil	0.50	640.00
17 September 2025	Prepare master tracker re: PPII list (2.8); email same to R. Beil, S. Ludovici, and CNB team (0.1); locate precedent and send same to G. Pesce (0.2).	G Zahiremami	3.10	3,069.00
17 September 2025	Review PPII list (0.9); email with G. Zahiremami re: same (0.1).	S Ludovici	1.00	1,110.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 September 2025	Draft W&C retention application.	G Zahiremami	2.60	2,574.00
18 September 2025	Review retention issues (0.1); review ordinary course professionals/interim compensation procedures motions (0.3).	S Ludovici	0.40	444.00
22 September 2025	Confer with W&C team re: PPII list (0.2); email to Latham re: same (0.1); revise retention application (0.4); emails with conflicts team re: same (0.1); review conflicts report (0.8).	G Zahiremami	1.60	1,584.00
23 September 2025	Email to Latham re: PPII list (0.1); review same and start preparing master tracker for conflict teams (1.2); review and revise retention application (0.9).	G Zahiremami	2.20	2,178.00
23 September 2025	Review PPII list.	S Ludovici	0.20	222.00
24 September 2025	Review and revise retention application (1.8); email same to S. Ludovici and R. Beil (0.1); confer with S. Ludovici re: same (0.3); email draft to G. Pesce (0.1); email to Alix team re: PPII (0.1).	G Zahiremami	2.40	2,376.00
24 September 2025	Revise PPII list (0.3); comment on draft retention application (0.3); discuss retention issues with G. Zahiremami (0.1).	S Ludovici	0.70	777.00
25 September 2025	Review and revise PPII list and edit master tracker (3.8); confer with S. Ludovici re: same (0.3); review declaration in support (0.2); email to G. Pesce re: same (0.1).	G Zahiremami	4.40	4,356.00
25 September 2025	Review connections reports.	S Ludovici	1.70	1,887.00
26 September 2025	Confer with conflicts team and review report.	G Zahiremami	0.80	792.00
26 September 2025	Review connections reports.	S Ludovici	2.60	2,886.00
27 September 2025	Email to G. Pesce re: retention.	G Zahiremami	0.10	99.00
30 September 2025	Confer with S. Ludovici re: retention (0.2); review disclosures re: same (0.5).	G Zahiremami	0.70	693.00
30 September 2025	Review connections reports.	S Ludovici	3.90	4,329.00
SUBTOTAL: Professional Retention & Fees - W&C			**33.60**	**35,177.00**

Professional Retention & Fees - Other

17 September 2025	Analyze ordinary course professional list and projected accounts payable against DIP Financing budget (0.3); draft email to D. Litz re: ordinary course professional list analysis (0.1).	D Mago	0.40	396.00
18 September 2025	Review interim compensation (0.1) and ordinary course professionals (0.1) motions.	B Lingle	0.20	274.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 September 2025	Review interim compensation procedures and ordinary course professionals motions and draft issues list (0.9); email same to S. Ludovici for review (0.1); revise same per comments from same and A. Zatz (0.3); confer with W&C team re: same (0.2).	G Zahiremami	1.50	1,485.00
23 September 2025	Correspondence with Alix re: retention application.	S Greissman	0.10	250.00
24 September 2025	Review issues relating to Quinn engagement (0.3); correspondence with G. Klidonas re: same (0.1).	S Greissman	0.40	1,000.00
24 September 2025	Correspond with W&C team re: retention applications for Debtors' professionals.	B Lingle	0.40	548.00
26 September 2025	Addressing L&W retention application.	A Zatz	0.30	630.00
26 September 2025	Review Quinn's retention application (0.2); email with W&C re: same (0.2).	L Miranda	0.40	488.00
28 September 2025	Review retention applications for Debtors' professionals (2.7); draft summary of findings re: same (1.2).	L Miranda	3.90	4,758.00
29 September 2025	Call with L&W re: retention.	A Zatz	0.10	210.00
30 September 2025	Email to AlixPartners re: retention app (0.1); review same (0.3).	G Zahiremami	0.40	396.00
30 September 2025	Review AlixPartners' draft retention application and engagement letter.	S Ludovici	0.40	444.00
SUBTOTAL: Professional Retention & Fees - Other			**8.50**	**10,879.00**

Reports, Schedules & US Trustee Issues

22 September 2025	Internal correspondence re: section 341 meeting.	S Greissman	0.20	500.00
22 September 2025	Prepare for (0.5); and participate in (1.5); 341 meeting; summarize 341 testimony (0.5).	E Smith	2.50	4,075.00
22 September 2025	Participate in 341 meeting.	B Lingle	1.00	1,370.00
SUBTOTAL: Reports, Schedules & US Trustee Issues			**3.70**	**5,945.00**

Tax Issues

29 September 2025	Call with D. Dreier re: tax issues.	A Zatz	0.20	420.00
SUBTOTAL: Tax Issues			**0.20**	**420.00**

TOTAL	**1,744.80**	**2,580,777.00**

Exhibit D

Sunmary of Expenses by Category

Category	Amount
Deposition Transcripts	$7,541.56
E-Discovery Data Hosting / Storage	$46.07
E-Discovery Data Processing	$70.00
E-Discovery Production	$130.00
E-Discovery Technical Time	$75.00
E-Discovery User Fees	$825.00
Filing Fees	$500.00
Printing	$2,863.16
UCC Filing Fees	$8,923.75
Grand Total	**$20,974.54**

Exhibit E

Detailed Statement of Expenses

Name	Date	English Narrative	Category	Amount
Sullivan, Janet	9/1/2025	E-Discovery Data Hosting / Storage	E-Discovery Data Hosting / Storage	$46.07
Sullivan, Janet	9/1/2025	E-Discovery User Fees	E-Discovery User Fees	$825.00
Hirshorn, Deanna	9/19/2025	Filing Fees and Related - Filing fee for Motion to Appear Pro Hac Vice for G. Pesce. - 11-Sep-25	Filing Fees	$100.00
Hirshorn, Deanna	9/19/2025	Filing Fees and Related - Filing fee for Motion to Appear Pro Hac Vice for S. Greissman. - 11-Sep-25	Filing Fees	$100.00
Hirshorn, Deanna	9/19/2025	Filing Fees and Related - Filing fee for Motion to Appear Pro Hac Vice for A. Zatz. - 11-Sep-25	Filing Fees	$100.00
Hirshorn, Deanna	9/19/2025	Filing Fees and Related - Filing fee for Motion to Appear Pro Hac Vice for C. Shore. - 11-Sep-25	Filing Fees	$100.00
Sullivan, Janet	9/19/2025	CS Time	E-Discovery Technical Time	$75.00
Slattery, Christine	9/19/2025	Order# 105794049 09/16/25 Christine Slattery	UCC Filing Fees	$2,989.00
Slattery, Christine	9/19/2025	Order# 105794049 09/16/25 Christine Slattery	UCC Filing Fees	$2,853.25
Slattery, Christine	9/19/2025	Order# 105794049 09/16/25 Christine Slattery	UCC Filing Fees	$2,947.25
Hirshorn, Deanna	9/26/2025	Filing Fees and Related - Filing fee for Motion to Appear Pro Hac Vice in the Texas Southern Bankruptcy Court for J. Zakia. - 25-Sep-25	Filing Fees	$100.00
Sullivan, Janet	9/26/2025	AlixPartners	E-Discovery Data Processing	$35.00
Slattery, Christine	9/26/2025	Order# 105891831 09/23/25 Christine Slattery	UCC Filing Fees	$134.25
Sullivan, Janet	9/27/2025	AlixPartners	E-Discovery Data Processing	$35.00
Sullivan, Janet	9/27/2025	MODV_UCC_001	E-Discovery Production	$130.00
Greissman, Scott	9/30/2025	Veritext, LLC. Invoice Date: 30 September 2025. Transcript Services - Original Transcript(s) | Witness: Zul Jamal , 30(b)(6) | Job #: 7625663 | Job Date: 9/25/2025	Deposition Transcripts	$4,080.50
Greissman, Scott	9/30/2025	Veritext, LLC. Invoice Date: 30 September 2025. Transcript Services - Original Transcript(s) | Witness: Chad Shandler | Job #: 7625991 | Job Date: 9/26/2025	Deposition Transcripts	$3,461.06
Greissman, Scott	9/30/2025	Powerhouse Copy LLC. Invoice Date: 30 September 2025. Office supplies for Katie Wick in NY for the documents for Court in Houston	Printing	$2,863.16

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

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

WHITE & CASE LLP'S SECOND MONTHLY FEE STATEMENT FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM OCTOBER 1, 2025 TO AND INCLUDING OCTOBER 31, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in the Cases:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	October 31, 2025 [Docket No. 616]	
	Beginning of Period	**End of Period**
Time period covered by this Statement:	October 1, 2025	October 31, 2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:		$2,875,109.60 (80% of $3,593,887.00)
Total reimbursable expenses requested in this Statement		$32,303.88
Total fees and expenses requested in this Statement (exclusive of 20% Holdback):		$2,907,413.48
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):		$3,626,190.88
Summary of Attorney Fees Requested[2]		
Total attorney fees requested in this Statement:		$3,549,962.00
Total actual attorney hours covered by this Statement:		2,490.3
Average hourly rate for attorneys:		$1,426
Summary of Paraprofessional Fees Requested[3]		
Total paraprofessional fees requested in this Statement:		$43,925.00

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

[2] Includes staff attorneys.

[3] May include individuals who are admitted to the bar.

Total actual paraprofessional hours covered by this Statement:	89.5
Average hourly rate for paraprofessionals:	$491

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* ("Compensation Procedures Order") [Docket No. 500], each Notice Party (as defined therein) receiving notice of the Monthly Statement will have until 4:00 p.m. (prevailing Central Time) 14 days after the filing of the Monthly Statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay White & Case an amount of 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement that are not objected to.

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, hereby files this monthly statement (this "Monthly Statement") for the period from October 1, 2025 to and including October 31, 2025 (the "Fee Period") requesting an aggregate amount of $2,907,413.48 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Committee in the amount of $2,875,109.60, representing 80% of the $3,593,887.00 of fees earned by White & Case for professional services to the Committee during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Fee Period in connection with such services in the amount of $32,303.88.

1. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by project category is attached here to as **Exhibit B.** A detailed statement of White & Case's hours expended and fees earned during the Fee Period is attached hereto as **Exhibit C**. A summary of White & Case's expenses incurred for which reimbursement is sought grouped by category is attached hereto as **Exhibit D**. A detailed statement of White & Case's expenses incurred for which reimbursement is sought is attached hereto as **Exhibit E**.

2. White & Case attorneys and paraprofessionals expended a total of 2,579.8 hours in connection with the chapter 11 cases during the Fee Period. All services rendered by White & Case for which compensation is sought pursuant to this Monthly Statement were rendered solely to or on behalf of the Committee. No payments were received by White & Case from any source other than the Debtors for services rendered or to be rendered in connection with the chapter 11 cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Statement shall serve via email to White & Case and each of the Notice Parties (defined in the Compensation Procedures Order) a written objection identifying with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses, and the basis for such objection (the "Objection") on or before the objection deadline.

4. Upon expiration of the objection deadline, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Statement that are not subject to an objection. If an Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and White & Case shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay White & Case an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

5. Although White & Case has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this Monthly Statement due to delays caused by accounting and processing during the Fee Period. White & Case reserves the right to make further statements or applications to this Court for

allowance of such fees and expenses not included herein, which further statement will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

December 2, 2025
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP
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- and -

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on December 2, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Summary of Hours and Fees by Timekeeper

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Aquije, Alonso	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	33.9	$1,110.00	$37,629.00
Bagdasarian, Amy	**Associate**	2003	Debt Finance Practice	5.1	$1,580.00	$8,058.00
Beil, Ryan	**Associate**	2021	Financial Restructuring & Insolvency (FRI) Practice	139.1	$1,280.00	$178,048.00
Bourgault, Jacob	**Associate**	2025	Pool Associates - Corporate	225.6	$870.00	$196,272.00
Chase, Ashley	**Associate**	2016	Financial Restructuring & Insolvency (FRI) Practice	181.5	$1,580.00	$286,770.00
Chemborisov, Gleb	**Litigation Specialist**	N/A	Timekeeper Pool	28.7	$490.00	$14,063.00
Chen, Ken	**Project Manager – Litigation Support**	N/A	Practice Technology - Disputes	24.2	$490.00	$11,858.00
Chen, Tony	**Manager of Litigation Support**	N/A	Timekeeper Pool	0.2	$490.00	$98.00
Chitwan, Charu	**Associate**	2014	Financial Restructuring & Insolvency (FRI) Practice	76.0	$1,110.00	$84,360.00
Dreier, David	**Partner**	1995	Tax Practice	0.8	$2,350.00	$1,880.00
Ericksen, A.J.	**Partner**	2005	Securities Practice	3.3	$2,200.00	$7,260.00
Galvan, Paolo	**Project Manager – Litigation Support**		Practice Technology - Disputes	0.5	$420.00	$210.00
Gorsich, Ronald	**Partner**	2001	Financial Restructuring & Insolvency (FRI) Practice	2.5	$1,900.00	$4,750.00
Graham, Richard	**Counsel**	2003	Financial Restructuring & Insolvency (FRI) Practice	1.1	$1,630.00	$1,793.00
Greissman, Scott	**Partner**	1995	Financial Restructuring & Insolvency (FRI) Practice	117.3	$2,500.00	$293,250.00
Hirshorn, Deanna	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	4.3	$490.00	$2,107.00
Hong, Alice	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	99.0	$1,370.00	$135,630.00
Isaac, Chantal	**Associate**	N/A	Pool Associates - Corporate	66.2	$870.00	$57,594.00
Kakani, Bhavini	**Associate**	2025	Litigation Practice	78.3	$870.00	$68,121.00
Koster, Charles	**Partner**	2009	Financial Restructuring & Insolvency (FRI) Practice	23.9	$1,900.00	$45,410.00
Lingle, Barrett	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	11.1	$1,370.00	$15,207.00
Litz, Dominic	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	90.8	$1,370.00	$124,396.00
Ludovici, Stephen	**Staff Attorney**	2014	Financial Restructuring & Insolvency (FRI) Practice	17.0	$1,110.00	$18,870.00
Mago, Don	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	72.8	$990.00	$72,072.00
Miranda, Loredana	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	252.3	$1,220.00	$307,806.00
Pesce, Gregory	**Partner**	2011	Financial Restructuring & Insolvency (FRI) Practice	55.6	$2,100.00	$116,760.00

Quintana, Anastasia	**Associate**	N/A	Pool Associates - Litigation	79.0	$870.00	$68,730.00
Rai, Parm	**Associate**	2024	Debt Finance Practice	11.6	$1,110.00	$12,876.00
Sachdev, Varoon	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	76.6	$1,420.00	$108,772.00
Shore, Christopher	**Partner**	1992	Financial Restructuring & Insolvency (FRI) Practice	182.7	$2,500.00	$456,750.00
Silnicki, Graham	**Associate**	2013	Debt Finance Practice	5.8	$1,470.00	$8,526.00
Slattery, Christine	**Legal Assistant**	N/A	Debt Finance Practice	0.5	$700.00	$350.00
Smith, Erin	**Counsel**	2014	Financial Restructuring & Insolvency (FRI) Practice	125.3	$1,630.00	$204,239.00
Venes, Aileen	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	12.4	$490.00	$6,076.00
Walz, Jacko	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	143.9	$870.00	$125,193.00
West, Colin	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	34.1	$1,790.00	$61,039.00
Wick, Katie	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	18.7	$490.00	$9,163.00
Yoo, Jade	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	14.2	$1,370.00	$19,454.00
Zahiremami, Golshid	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	125.3	$990.00	$124,047.00
Zakia, Jason	**Partner**	1999	Financial Restructuring & Insolvency (FRI) Practice	73.4	$2,200.00	$161,480.00
Zatz, Andrew	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	65.2	$2,100.00	$136,920.00
Grand Total				**2,579.8**		**$3,593,887.00**

Exhibit B

Statement of Hours and Fees by Project Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B03	Automatic Stay Issues	4.5	$8,161.00
B04	Case Administration	40.6	$33,372.00
B05	Case Strategy	70.2	$143,869.00
B06	Cash Management & Intercompany Issues	0.2	$274.00
B07	Claims Administration & Objections	7.5	$9,305.00
B08	Committee Meetings & Communications	64.2	$116,509.00
B10	Creditor Communications	0.5	$685.00
B11	DIP Financing & Cash Collateral	57.3	$99,952.00
B12	Discovery	982.1	$1,173,050.00
B13	Exclusivity, Plan & Disclosure Statement	247.7	$419,061.00
B14	Executory Contracts & Unexpired Leases	0.1	$210.00
B15	Hearings & Court Matters	103.8	$188,028.00
B16	Investigation of Causes of Action	755.4	$1,003,002.00
B18	Mediation	167.4	$308,395.00
B20	Professional Retention & Fees - W&C	64.0	$68,596.00
B21	Professional Retention & Fees - Other	11.9	$16,670.00
B22	Reports, Schedules & US Trustee Issues	1.6	$2,868.00
B23	Tax Issues	0.8	$1,880.00
	Grand Total	**2,579.8**	**$3,593,887.00**

Exhibit C

Detailed Statement of Hours and Fees

WHITE & CASE

Official Committee of Unsecured Creditors of ModivCare Inc.
RE: Project Emcee

OUR REF: 1908759-0002

For professional services for the period ending 31 October 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Automatic Stay Issues				
10 October 2025	Review and summarize stay relief motion and confer with A. Zatz re: same.	D Litz	0.50	685.00
15 October 2025	Reviewing lift stay motion.	A Zatz	0.30	630.00
20 October 2025	Call with LW re: stay relief motion (0.2); confer with A. Zatz re: same (0.2).	D Litz	0.40	548.00
23 October 2025	Call re: lift stay.	J Shore	0.40	1,000.00
23 October 2025	Confer with A. Zatz re: insurance issues (0.2); review and analyze insurance motion, order, lift stay motion and other materials (1.6); conference call with Debtors counsel and team re: lift stay motion (0.2); Confer with A. Zatz and J. Zakia re: same (0.5).	R Gorsich	2.50	4,750.00
23 October 2025	Call with W&C and LW teams re: stay relief objection.	D Litz	0.40	548.00
SUBTOTAL: Automatic Stay Issues			**4.50**	**8,161.00**
Case Administration				
1 October 2025	Update work in progress email (0.3); update work in progress tracker (0.4).	D Mago	0.70	693.00
1 October 2025	Review work in progress tracker (0.2); email to D. Mago re: same (0.1); prepare email re: dial-in information (0.2).	G Zahiremami	0.50	495.00
1 October 2025	Review work in progress tracker.	J Walz	0.10	87.00
1 October 2025	Draft and file transcript request form for September 30th hearing (0.2); download and attempt to extract MP3 file of September 30th hearing (0.1); email C. Koster, A. Zatz, A. Chase, L. Miranda, R. Beil and D. Mago re: same (0.1); email Judicial Transcribers and K. Wick re: transcript request (0.1).	D Hirshorn	0.50	245.00
1 October 2025	Review and respond to emails from R. Beil and W&C team re: assistance with filing of objection to Disclosure Statement approval and E. Smith declaration (0.1); review and respond to emails from E. Smith and A. Hong re: PHV motion of E. Smith (0.1); correspond further with E. Smith re: same (0.1); correspond with E. Smith re: CMECF credentials (0.1); prepare for and assist team with e-filing of objection and declaration (1.5).	A Venes	1.90	931.00
1 October 2025	Review docket and update case calendar (0.1); circulate witness and exhibit lists to D. Mago (0.1).	K Wick	0.20	98.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
2 October 2025	Update work in progress email (0.1); correspondence with W&C team re: same (0.1).	D Mago	0.20	198.00
2 October 2025	Follow up tel. call with PACER Service Center re: E. Smith CM ECF account activation for submission of PHV and declaration (1.3); finalize and e-file E. Smith PHV motion (0.3); prepare for, and assist team with e-filing of Committee's objection to motion to approve Disclosure Statement and supporting declaration (0.9); confirm filings with W&C team (0.1); email courtesy copies of filings to Chambers (0.1); update pleadings file (0.1).	A Venes	2.80	1,372.00
2 October 2025	Review docket for updates and update case calendar (0.2); circulate outlook calendar invite for hearing (0.1); circulate hearing transcript to W&C team (0.1); pull exhibits for hearing for A. Aquije (0.2).	K Wick	0.60	294.00
3 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
3 October 2025	Review docket for updates and update case calendar (0.1); register attorneys for hearing (0.2).	K Wick	0.30	147.00
4 October 2025	Update case timeline.	J Walz	3.20	2,784.00
6 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
6 October 2025	Provide comments to work in progress tracker.	L Miranda	0.20	244.00
6 October 2025	Update work in progress email (0.6); correspondence with G. Zahiremami, L. Miranda re: same (0.1).	D Mago	0.70	693.00
6 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
6 October 2025	Confer with L. Miranda and K. Wick re: electronic appearances for upcoming hearing (0.1); submit electronic appearance for C. Koster, C. Shore, S. Greissman, A. Zatz, J. Zakia, and A. Chase (0.1).	D Hirshorn	0.20	98.00
6 October 2025	Review docket for updates and update case calendar (0.3); add C. Chitwan to case calendar and team list servs (0.1).	K Wick	0.40	196.00
7 October 2025	Provide comments to work in progress tracker (0.2); attend call with Alix & W&C re: work streams (0.6).	L Miranda	0.80	976.00
7 October 2025	Update work in progress email (0.5); correspondence with G. Zahiremami, L. Miranda, R. Beil re: same (0.1); correspondence with D. Litz re: same (0.1).	D Mago	0.70	693.00
7 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
7 October 2025	Review docket for updates and update case calendar (0.3); correspondence with W&C team re: transcripts	K Wick	2.20	1,078.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); prepare index of binder (1.2); coordinate printing of same (0.6).			
8 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
8 October 2025	Update work in progress tracker.	L Miranda	0.20	244.00
8 October 2025	Review case docket for new filings (0.1); review email from D. Litz re: work stream updates (0.1); revise work in progress email (0.9); correspondence with L. Miranda, R. Beil, and G. Zahiremami re: same (0.1).	D Mago	1.20	1,188.00
8 October 2025	Review work in progress tracker.	G Zahiremami	0.10	99.00
8 October 2025	Review docket for updates and update case calendar (0.2); circulate hearing transcript to W&C team (0.1).	K Wick	0.30	147.00
9 October 2025	Update work in progress tracker.	L Miranda	0.60	732.00
9 October 2025	Update work in progress email.	D Mago	0.30	297.00
9 October 2025	Review and respond to email from L. Miranda re: preparation for and availability to assist with e-filing of case document (0.1); prepare and e-file transcript order for 10/03 hearing transcript (0.2); correspond with K. Wick and L. Miranda re: same (0.1); review Judge Perez interactive calendar for 10/10 status conference and correspond with S. Ludovici re: same (0.1).	A Venes	0.50	245.00
9 October 2025	Review docket for updates and update case calendar (0.3); correspondence with L. Miranda and A. Venes re: hearing transcript (0.2).	K Wick	0.50	245.00
10 October 2025	Review and revise work in progress tracker, confer with D. Mago re: same.	D Litz	0.20	274.00
10 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
10 October 2025	Meet with A. Chase re: case update.	C Isaac	0.30	261.00
10 October 2025	Register e-Appearances of team members for 10/10 9:30AM hearing (0.1); correspond with W&C team re: same (0.1).	A Venes	0.20	98.00
10 October 2025	Review docket for updates and update case calendar (0.3); send out calendar invite for status conference (0.2).	K Wick	0.50	245.00
13 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.20	284.00
13 October 2025	Update work in progress email (0.5); correspondence with L. Miranda re: same (0.1); correspondence with D. Litz and V. Sachdev re: same (0.1).	D Mago	0.70	693.00
13 October 2025	Review docket for updates and update case calendar	K Wick	0.60	294.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); update data site folder (0.2); rename discover documents for L. Miranda (0.3).			
14 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
14 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
14 October 2025	Update work in progress email.	D Mago	0.30	297.00
14 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
14 October 2025	Review docket for updates and update case calendar (0.2); circulate hearing transcript to L. Miranda (0.1).	K Wick	0.30	147.00
15 October 2025	Update work in progress tracker.	L Miranda	0.20	244.00
15 October 2025	Update work in progress tracker.	D Mago	0.40	396.00
15 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
16 October 2025	Review and revise work in progress tracker.	V Sachdev	0.20	284.00
16 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
16 October 2025	Update key dates per scheduling order (0.2) work in progress email (0.4); correspondence with W&C team re: same (0.1).	D Mago	0.70	693.00
16 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
17 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
17 October 2025	Update work in progress tracker.	D Mago	0.20	198.00
17 October 2025	Review docket for updates and update case calendar.	K Wick	0.50	245.00
20 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
20 October 2025	Update work in progress tracker.	L Miranda	0.20	244.00
20 October 2025	Correspondence with L, Miranda., R. Beil, and G. Zahiremami re: work in progress tracker (0.1); correspondence with D. Litz re: same (0.1); update work in progress tracker (0.4).	D Mago	0.60	594.00
20 October 2025	Review docket for updates and update case calendar.	K Wick	0.40	196.00
21 October 2025	Review and comment on work in progress tracker (0.1): preparation for (0.4) and attend call with A. Zatz re: open workstreams (0.5).	V Sachdev	1.00	1,420.00
21 October 2025	Telephone conference with A. Zatz and W&C associate team re: work in process.	B Lingle	0.50	685.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
21 October 2025	Attend work in progress meeting.	D Litz	0.30	411.00
21 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
21 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
21 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
22 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
22 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
22 October 2025	Review docket for updates and update case calendar (0.3); correspondence with S. Ludovici re: transcripts (0.1).	K Wick	0.40	196.00
23 October 2025	Update work in progress tracker.	L Miranda	0.20	244.00
23 October 2025	Update work in progress tracker.	D Mago	0.40	396.00
23 October 2025	Monitor docket for recent activity.	D Hirshorn	0.10	49.00
24 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.20	284.00
24 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
24 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
24 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
24 October 2025	Update document review folder for L. Miranda.	D Hirshorn	0.40	196.00
27 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
27 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
27 October 2025	Update work in progress tracker.	D Mago	0.50	495.00
27 October 2025	Review work in progress tracker.	G Zahiremami	0.20	198.00
27 October 2025	Update pleading file.	D Hirshorn	0.10	49.00
27 October 2025	Update pleadings file.	A Venes	0.10	49.00
28 October 2025	Update work in progress tracker.	L Miranda	0.20	244.00
28 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
28 October 2025	Review and respond to emails with L. Miranda and A. Venes re: upcoming filing (0.1); update hearing exhibits for upcoming filing (0.1).	D Hirshorn	0.20	98.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
29 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
29 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
29 October 2025	Update datasite folder with new documents (0.6); update case calendar (0.5).	K Wick	1.10	539.00
30 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
30 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
30 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
30 October 2025	Locate and email precedent standing motion to D. Litz.	D Hirshorn	0.30	147.00
30 October 2025	Review docket for updates and update case calendar.	K Wick	0.20	98.00
31 October 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
31 October 2025	Update work in progress tracker.	L Miranda	0.10	122.00
31 October 2025	Update work in progress tracker.	D Mago	0.30	297.00
31 October 2025	Review and revise work in progress tracker (0.1); email to D. Mago re: same (0.1).	G Zahiremami	0.20	198.00
31 October 2025	Review and respond to email from L. Miranda re: A. Chase pro hac vice motion (0.1); update A. Chase pro hac vice motion (0.1); coordinate filing of same with Managing Clerks (0.1); review and respond to emails with J. Walz and L. Miranda re: proposed evidence submissions to Chambers (0.2); confer with L. Miranda re: same (0.1); prepare binder of same (0.3); coordinate with Houston Office Services to prepare and deliver same (0.1); email Chambers courtesy copy of same (0.1).	D Hirshorn	1.10	539.00
31 October 2025	Review docket for updates and update case calendar.	K Wick	0.40	196.00
SUBTOTAL: Case Administration			**40.60**	**33,372.00**

Case Strategy

1 October 2025	Calls with Alix and W&C teams re: strategy.	J Shore	0.50	1,250.00
2 October 2025	Calls with Alix and W&C teams re: settlement strategy.	J Shore	0.40	1,000.00
2 October 2025	Call with W&C team re: strategy.	A Zatz	1.00	2,100.00
6 October 2025	Conferences with W&C and Alix teams re: UCC strategy and tactics.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 October 2025	Update call with L&W (0.2); call with W&C team re: strategy (0.3); Call with W&C team re: strategy post-hearing (0.6).	A Zatz	1.10	2,310.00
6 October 2025	Call with C. Shore, J. Zakia, S. Greissman, A. Zatz, E. Smith, A. Chase, B. Lingle, and L. Miranda re: case strategy going forward.	V Sachdev	0.50	710.00
6 October 2025	Telephone conference with W&C team re: strategy.	B Lingle	1.30	1,781.00
7 October 2025	Weekly call with Alix Partners (0.5); conference call with G. Klidonas re: case strategy (0.2); conference call with D. Rowe re: case status and strategy update (0.3); follow up correspondence with D. Rowe (0.2).	S Greissman	1.20	3,000.00
7 October 2025	Calls with Alix and W&C teams re: valuation.	J Shore	1.80	4,500.00
7 October 2025	Prepare for and participate in call with W&C team re: case strategy.	J Zakia	0.60	1,320.00
7 October 2025	Conferences with W&C and Alix teams re: strategy and tactics for debtor engagement.	G Pesce	1.80	3,780.00
7 October 2025	Strategy call with Alix (0.5); strategy call with S. Greissman (0.2).	A Zatz	0.70	1,470.00
7 October 2025	Call with W&C and Alix partners re: case strategy.	D Litz	1.00	1,370.00
8 October 2025	Calls with Alix and W&C teams re: case settlement strategy.	J Shore	1.00	2,500.00
8 October 2025	Conferences with Alix teams re: settlement strategy issues.	G Pesce	1.60	3,360.00
8 October 2025	Reviewing daily work in progress tracker.	A Zatz	0.30	630.00
9 October 2025	Conferences with Alix teams re: potential settlement issues.	G Pesce	2.60	5,460.00
10 October 2025	Conferences with W&C and Alix teams re: discovery and challenge.	G Pesce	0.80	1,680.00
10 October 2025	Call with W&C team re: catch-up.	A Zatz	0.40	840.00
10 October 2025	Post-hearing strategy call re: discovery and challenge.	D Litz	0.20	274.00
10 October 2025	Call with W&C re: debrief of hearing (0.2); call with W&C and Alix re: valuation (0.5).	L Miranda	0.70	854.00
13 October 2025	Conferences with W&C and Alix teams re: valuation.	G Pesce	0.80	1,680.00
13 October 2025	Review Debtors' valuation analysis.	L Miranda	0.40	488.00
14 October 2025	Weekly Alix strategy call (0.6); updated valuation discussion with Alix (0.8); review valuation discovery	S Greissman	2.20	5,500.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	and materials (0.8).			
14 October 2025	Attend meetings with Alix and W&C teams re: strategy.	J Shore	0.80	2,000.00
14 October 2025	Conferences with W&C and Alix teams re: valuation analysis.	G Pesce	0.80	1,680.00
14 October 2025	Call among W&C and Alix re: case strategy and workstreams (0.7); call among W&C and Alix re: valuation (0.9).	A Chase	1.60	2,528.00
14 October 2025	Valuation call with W&C team and Alix Valuation team (0.9); strategy call with core W&C and Alix teams (0.7).	V Sachdev	1.60	2,272.00
14 October 2025	Weekly W&C and Alix team strategy meeting.	B Lingle	0.80	1,096.00
14 October 2025	Valuation meeting with W&C and Alix teams.	D Litz	0.90	1,233.00
15 October 2025	Calls with Alix and W&C teams re: strategy.	J Shore	0.50	1,250.00
15 October 2025	Conferences with W&C and Alix teams re: strategy and tactics.	G Pesce	0.80	1,680.00
15 October 2025	Reviewing daily work in progress tracker (0.1); and internal calls re: settlement meeting (0.8).	A Zatz	0.90	1,890.00
15 October 2025	Attend meeting with A. Zatz, S. Greissman, L. Feld, V. Sachdev, and D. Litz re: strategy meeting.	D Mago	0.40	396.00
16 October 2025	Calls with Alix and W&C teams re: strategy.	J Shore	0.40	1,000.00
16 October 2025	Confer with C. Shore re: litigation strategy.	J Zakia	0.40	880.00
16 October 2025	Conferences with W&C and Alix teams re: litigation strategy.	G Pesce	0.80	1,680.00
17 October 2025	Calls with Alix and W&C teams re: strategy.	J Shore	0.80	2,000.00
17 October 2025	Conferences with W&C and Alix teams re: litigation strategy.	G Pesce	1.80	3,780.00
20 October 2025	Calls with Alix and W&C teams re: valuation strategy.	J Shore	1.60	4,000.00
20 October 2025	Conferences with W&C and Alix teams re: valuation strategy.	G Pesce	1.80	3,780.00
20 October 2025	Call with Alix re: settlement issues (0.9); strategy calls with V. Sachdev (0.8).	A Zatz	1.70	3,570.00
21 October 2025	Internal strategy meeting at W&C.	S Greissman	0.80	2,000.00
21 October 2025	Call with Alix and W&C teams re: strategy.	J Shore	1.20	3,000.00
21 October 2025	Strategy call with C. Shore (0.2); strategy call with B.	A Zatz	1.90	3,990.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Lingle (0.1); strategy meeting with S. Greissman (0.4); strategy meeting with B. Lingle (0.2); Call with W&C team re: strategy (0.5); and strategy call with Alix (0.5).			
21 October 2025	Weekly strategy call with W&C and Alix teams.	B Lingle	0.70	959.00
21 October 2025	Attend Alix and W&C teams meeting re: strategy.	D Litz	0.50	685.00
21 October 2025	Meeting with A. Zatz, V. Sachdev, A. Chase and other members of W&C re: workstream update.	D Mago	0.50	495.00
23 October 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics.	G Pesce	1.80	3,780.00
23 October 2025	Strategy call with C. Shore (0.1); and strategy call with Jupiter (0.2).	A Zatz	0.30	630.00
24 October 2025	Calls with Alix and W&C teams re: strategy.	J Shore	0.30	750.00
24 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	1.00	2,100.00
24 October 2025	Strategy call with Alix.	A Zatz	0.20	420.00
24 October 2025	Call with W&C re: litigation strategy (0.8); follow-up call with J. Walz, E. Smith and A. Chase re: same (0.3); follow-up call with E. Smith and A. Chase re: same (0.3).	L Miranda	1.40	1,708.00
25 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	0.80	1,680.00
26 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	0.80	1,680.00
27 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	1.80	3,780.00
28 October 2025	Review correspondence re: discovery issues.	J Zakia	0.40	880.00
28 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	1.80	3,780.00
28 October 2025	Reviewing lender group statement (0.5); related correspondence (0.2); and strategy meeting w Alix (0.4).	A Zatz	1.10	2,310.00
28 October 2025	Call with core Alix and W&C teams re: strategy and next steps.	V Sachdev	0.40	568.00
28 October 2025	Attend weekly advisor strategy call.	B Lingle	0.50	685.00
28 October 2025	Review Committee materials for meeting (0.4); meeting with W&C and Alix teams re: case strategy (1.0).	D Litz	1.40	1,918.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 October 2025	Review 1L pleading and internal follow up.	S Greissman	0.50	1,250.00
29 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	0.80	1,680.00
29 October 2025	Revise key date tracker for Committee materials.	D Litz	0.30	411.00
31 October 2025	Calls with Alix and W&C teams re: settlement strategy (0.8); call with Quinn re: report (0.6); call re: depositions (0.6); review expert report drafts (2.3); call re: next steps (1.4).	J Shore	5.70	14,250.00
31 October 2025	Conferences with W&C and Alix teams re: valuation strategy and tactics.	G Pesce	0.80	1,680.00
31 October 2025	Review and summarize notice of contract assumption.	D Litz	0.40	548.00
SUBTOTAL: Case Strategy			**70.20**	**143,869.00**

Cash Management & Intercompany Issues

10 October 2025	Review and summarize 345(b) extension motion.	D Litz	0.20	274.00
SUBTOTAL: Cash Management & Intercompany Issues			**0.20**	**274.00**

Claims Administration & Objections

2 October 2025	Confer with J. Walz re: nature of claims against Debtors (0.9); confer with S. Reizel (Kurtzman Carson) re: access to proofs of claim (0.2).	R Graham	1.10	1,793.00
2 October 2025	Review proofs of claims (3.3); discussion with A. Konstantynovski re: same (0.2); discussion with R. Graham re: same (0.8); correspondence with A. Chase, E. Smith, and C. Shore re: same (0.2).	J Walz	4.50	3,915.00
5 October 2025	Reviewing unsecured notes subordination agreement.	A Zatz	0.40	840.00
13 October 2025	Analyze claims register re: Committee claims (0.2); correspondence with D. Litz re: same (0.1).	D Mago	0.30	297.00
15 October 2025	Calls re: claims pool.	J Shore	0.70	1,750.00
23 October 2025	Confer with A. Zatz re: meeting with Alix on claims analysis (0.1); preparation for (0.2) and attend (0.2) meeting with Alix re: claims register analysis.	V Sachdev	0.50	710.00
SUBTOTAL: Claims Administration & Objections			**7.50**	**9,305.00**

Committee Meetings & Communications

1 October 2025	Attend Committee advisor call.	J Shore	1.00	2,500.00
1 October 2025	Draft minutes re: Committee standing call Sept 25	D Mago	1.10	1,089.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.7); draft agenda for meeting with Committee tomorrow (0.4).			
2 October 2025	Preparation for and attend Committee call.	J Shore	1.00	2,500.00
2 October 2025	Prepare for hearing (0.8); confer with C. Shore re: same (0.3); prepare for Committee meeting (0.3); participate in advisor pre-call (0.2); participate in Committee meeting (0.8).	J Zakia	2.40	5,280.00
2 October 2025	Call among Committee advisors to prepare for Committee call (0.2); call among Committee and professionals (0.8).	A Chase	1.00	1,580.00
2 October 2025	Correspond with B. Lingle re: Committee meeting (0.1); draft email summary of key dates for Committee meeting (0.2).	V Sachdev	0.30	426.00
2 October 2025	Attend Committee meeting.	A Hong	0.80	1,096.00
2 October 2025	Attend weekly Committee meeting.	J Yoo	0.80	1,096.00
2 October 2025	Attend Committee weekly meeting (0.8); prepare for meeting re: same (0.3); emails with B. Lingle re: same (0.1).	L Miranda	1.20	1,464.00
2 October 2025	Update meeting agenda re: today's standing Committee Call (0.2); correspondence with A. Zatz and B. Lingle re: same (0.1); correspondence with K. McGlynn and J. Amico (AlixPartners) re: same (0.1).	D Mago	0.40	396.00
2 October 2025	Attend Committee call.	G Zahiremami	0.40	396.00
6 October 2025	Draft minutes re: Oct 2 standing call with Committee.	D Mago	0.50	495.00
8 October 2025	Review Committee updated materials (0.5); prepare for Committee meeting (0.5).	S Greissman	1.00	2,500.00
8 October 2025	Commenting on Alix slides for Committee meeting (0.2); and revising agenda for Committee meeting (0.1).	A Zatz	0.30	630.00
8 October 2025	Correspondence with D. Litz re: case milestones in preparation for Committee meeting (0.1); review various pleading re: case milestones (0.3); draft agenda for standing call with Committee on Oct 9 (0.4).	D Mago	0.80	792.00
9 October 2025	Attend Committee pre-call among advisors (0.5); attend Committee weekly call (1.0).	S Greissman	1.50	3,750.00
9 October 2025	Review and comment on Committee materials (0.6); attend Committee meeting (0.8); attend W&C team calls (0.4).	J Shore	1.80	4,500.00
9 October 2025	Advisor pre-call for Committee meeting (0.1); and	A Zatz	0.60	1,260.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	weekly Committee meeting (0.5).			
9 October 2025	Attend Committee meeting.	C Koster	0.50	950.00
9 October 2025	Attend standing call with Committee.	C West	0.50	895.00
9 October 2025	Call among Committee advisors to prepare for Committee meeting (0.2); prepare outline of discovery updates for Committee meeting (0.3); attend meeting among Committee and advisors (0.6).	A Chase	1.10	1,738.00
9 October 2025	Attend preparation call prior to Committee meeting with Alix and W&C teams (0.2); attend Committee meeting (0.5).	V Sachdev	0.70	994.00
9 October 2025	Attend Committee meeting.	A Hong	0.50	685.00
9 October 2025	Committee advisor pre-call meeting (0.3); Committee meeting (0.5).	D Litz	0.80	1,096.00
9 October 2025	Attend weekly Committee meeting.	J Yoo	0.50	685.00
9 October 2025	Attend meeting with Committee (0.5); review presentation from Alix re: same (0.2).	L Miranda	0.70	854.00
13 October 2025	Conferences with W&C, Alix and Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
15 October 2025	Reviewing Committee meeting agenda.	A Zatz	0.10	210.00
15 October 2025	Draft agenda for tomorrow's meeting with Committee.	D Mago	0.30	297.00
16 October 2025	Standing update call with Alix (1.0); review Committee presentation materials re: all-hands meeting (2.1).	S Greissman	3.10	7,750.00
16 October 2025	Attend standing call with Committee (0.5); attend financial advisor call (1.0).	J Shore	1.50	3,750.00
16 October 2025	Prepare for and attend Committee meeting.	J Zakia	0.50	1,100.00
16 October 2025	Attending Committee meeting.	A Zatz	0.60	1,260.00
16 October 2025	Attend call with Committee.	C West	0.50	895.00
16 October 2025	Call among Alix, W&C, Committee.	A Chase	0.50	790.00
16 October 2025	Attend Committee meeting.	A Hong	0.50	685.00
16 October 2025	Attend Committee Call for further workstream status updates re: same (0.5); correspondence with W&C and Alix teams re: same (0.3).	R Beil	0.80	1,024.00
16 October 2025	Attend meeting with Committee.	L Miranda	0.40	488.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 October 2025	Revise email from AlixPartners re: key dates (0.1); attend standing meeting (0.5).	D Mago	0.60	594.00
16 October 2025	Attend Committee meeting (0.4); emails to W&C team re: same (0.2).	G Zahiremami	0.60	594.00
20 October 2025	Emails with W&C and Alix teams re: Committee.	J Shore	0.30	750.00
20 October 2025	Draft meeting minutes for Committee standing call held on 10.16.25 (0.4); draft meeting minutes for Committee standing call held on 10.09.25 (0.5).	D Mago	0.90	891.00
21 October 2025	Pre-Committee call with Alix partners re: settlement (0.5); Committee call re: settlement meeting and presentation (1.0); review Committee presentation and last minute edits (1.1); correspondence with M. Root re: Committee member attendance (0.2).	S Greissman	2.80	7,000.00
21 October 2025	Internal pre-call for Committee meeting (0.8); and attending Committee meeting (0.9).	A Zatz	1.70	3,570.00
21 October 2025	Call among Committee and Committee advisors.	A Chase	0.90	1,422.00
21 October 2025	Attend Committee meeting re: settlement conference.	V Sachdev	0.90	1,278.00
21 October 2025	Attend Committee call re: pre-settlement discussion.	A Hong	0.50	685.00
21 October 2025	Advisor pre-call to discuss strategy (0.7); Committee meeting re: settlement (1.0).	D Litz	1.70	2,329.00
21 October 2025	Attend meeting with Committee and display presentation (0.9); draft meeting minutes re: same (0.4).	D Mago	1.30	1,287.00
21 October 2025	Attend Committee meeting.	G Zahiremami	0.70	693.00
22 October 2025	Correspondence with D. Litz re: reformation of Committee (0.1); correspondence with Service Desk re: Committee listserv adjustments (0.1); draft agenda for tomorrow's call with Committee (0.2); correspondence with A. Zatz and D. Litz re: same (0.1).	D Mago	0.50	495.00
23 October 2025	Attend Committee advisor pre-call (0.5); attend Committee standing weekly call (1.0).	S Greissman	1.50	3,750.00
23 October 2025	Pre-call with advisors re: Committee meeting (0.5); attend call with Committee (0.3); attend financial advisor call (0.5).	J Shore	1.30	3,250.00
23 October 2025	Reviewing Alix slides for Committee meeting (0.3); Committee meeting advisor pre-call (0.4); attending Committee meeting (0.3).	A Zatz	1.00	2,100.00
23 October 2025	Attend weekly Committee call.	C West	0.30	537.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
23 October 2025	Call among W&C and Alix to prepare for call with Committee (0.3); call among Committee and advisors (0.3).	A Chase	0.60	948.00
23 October 2025	Attend Committee meeting.	V Sachdev	0.30	426.00
23 October 2025	Attend Committee meeting.	A Hong	0.30	411.00
23 October 2025	Attend Committee meeting (0.3); weekly advisors pre-call with W&C and Alix teams (0.5).	B Lingle	0.80	1,096.00
23 October 2025	Attend Committee advisor pre-call re: strategy (0.5); Committee meeting (0.8).	D Litz	1.30	1,781.00
23 October 2025	Attend meeting with Committee and take notes.	D Mago	0.40	396.00
27 October 2025	Review Committee materials.	J Shore	0.90	2,250.00
28 October 2025	Attend call with Committee.	J Shore	0.50	1,250.00
29 October 2025	Update e-mail to Committee re: ad hoc group statement.	A Zatz	0.10	210.00
29 October 2025	Review Disclosure Statement and scheduling order re: key dates (0.1); correspondence with D. Litz re: Committee update key dates (0.1); draft agenda re: tomorrow's Committee meeting (0.2).	D Mago	0.40	396.00
30 October 2025	Attend Committee advisor pre call (0.5); attend Committee meeting call (1.0).	S Greissman	1.50	3,750.00
30 October 2025	Attend call with Committee.	J Shore	1.00	2,500.00
30 October 2025	Conferences with W&C, Alix and Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
30 October 2025	Pre-call for Committee meeting (0.4); and attending Committee meeting (0.5).	A Zatz	0.90	1,890.00
30 October 2025	Call among Committee, W&C, and Alix.	A Chase	0.50	790.00
30 October 2025	Attend Committee pre-call with core Alix and W&C teams (0.4); attend Committee call (0.6).	V Sachdev	1.00	1,420.00
30 October 2025	Attend Committee meeting.	A Hong	0.50	685.00
30 October 2025	Attend Committee advisor pre-call (0.5); Committee meeting (1.0).	D Litz	1.50	2,055.00
30 October 2025	Attend weekly Committee meeting.	J Yoo	0.50	685.00
30 October 2025	Attend Committee meeting and take notes.	D Mago	0.60	594.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 October 2025	Attend standing call with Committee re: updates.	G Zahiremami	0.50	495.00
SUBTOTAL: Committee Meetings & Communications			**64.20**	**116,509.00**

Creditor Communications

16 October 2025	Attend Committee meeting.	D Litz	0.50	685.00
SUBTOTAL: Creditor Communications			**0.50**	**685.00**

DIP Financing & Cash Collateral

1 October 2025	Pre-call re: DIP Financing order (0.5); DIP Financing order conference call with Debtors and 1L, lender advisor (1.0); review DIP Financing issues chart (0.6).	S Greissman	2.10	5,250.00
1 October 2025	Revisions to DIP Financing objections.	J Shore	3.00	7,500.00
1 October 2025	Internal pre-call (0.2); all hands call re: DIP Financing Order (1.1).	A Zatz	1.30	2,730.00
1 October 2025	Multiple telephone internal re: order (1.0); prepare demonstrative (0.7); telephone Latham re: order (0.7).	C Koster	2.40	4,560.00
1 October 2025	Draft chart summarizing Debtors-addressed Committee issues with Proposed Final DIP Financing Order and outstanding remaining issues re: DIP Financing Hearing (1.0); draft chart summarizing non-addressed Committee issues with Proposed Final DIP Financing Order re: same (1.8); analyze Proposed Final DIP Financing Order (0.7); analyze W&C markup of Proposed Final DIP Financing Order re: same (0.4).	R Beil	3.90	4,992.00
2 October 2025	Conference call with A. Zatz and C. Koster re: DIP Financing objection/hearing preparation (0.6); review DIP Financing open issues chart (1.3).	S Greissman	1.90	4,750.00
2 October 2025	Follow-up on DIP Financing hearing (0.9); Disclosure Statement objection review and calls (6.8); preparation for DIP Financing closing argument (4.0).	J Shore	11.70	29,250.00
2 October 2025	Reviewing chart of DIP Financing objection responses.	A Zatz	0.40	840.00
2 October 2025	Review and edit reply table (0.9); telephone internal (0.9); prepare for hearing (0.6).	C Koster	2.40	4,560.00
2 October 2025	Calls with Committee and advisors to discuss DIP Financing hearing.	E Smith	1.90	3,097.00
2 October 2025	Review and incorporate C. Shore's comments to DIP closing argument (2.1); revise closing argument re: same (2.8); emails with C. Shore re: same (0.2); review diligence for fact citations re: same (0.4).	L Miranda	5.50	6,710.00
3 October 2025	Review DIP Financing open issues chart.	S Greissman	0.60	1,500.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 October 2025	Reviewing revised final DIP Financing order (0.5); related call with L&W and Paul Hastings (0.3).	A Zatz	0.80	1,680.00
3 October 2025	Review and revise closing outline for C. Shore on DIP Financing hearing (2.2); call with C. Shore re: same (0.1); email with W&C re: same (0.2); call with W&C re: DIP Financing hearing preparation (0.8).	L Miranda	3.30	4,026.00
5 October 2025	Continue drafting summary of hot documents for W&C (1.1); review and revise timeline of key events and Board materials re: same (3.7).	L Miranda	4.80	5,856.00
6 October 2025	Review DIP Financing order.	C Koster	0.30	570.00
8 October 2025	Analyze DIP Financing order re: professional fees (0.1); analyze Paul Hastings invoice (0.1); correspondence with A. Zatz re: same (0.1).	D Mago	0.30	297.00
9 October 2025	Review deposition and hearing re: DIP Financing size and Debtors' calculations.	C Isaac	4.30	3,741.00
10 October 2025	Review DIP Financing budget update.	S Greissman	0.10	250.00
10 October 2025	Review G. Zahiremami research re: potential litigation issue (0.3); correspond with Feld re: same (0.1).	V Sachdev	0.40	568.00
14 October 2025	Review and analyze potential litigation issue research (1.6); correspond with W&C team re: same (0.3).	V Sachdev	1.90	2,698.00
14 October 2025	Analyze CalOptima Contract and Schedule re: bankruptcy code analysis.	R Beil	1.30	1,664.00
18 October 2025	Analyze DIP Financing order re: DIP Financing Liens (0.1) attend call with S. Greissman, A. Zatz, E. Feld, D. Litz, and V. Sachdev re: same and take notes (0.5); revise notes and send to D. Litz and V. Sachdev (0.2); legal research re: potential litigation issue (0.9); draft email memo re: same (0.5).	D Mago	2.20	2,178.00
21 October 2025	Correspond with A. Zatz re: calculation of time periods for appeal and analysis re: same.	B Lingle	0.50	685.00
SUBTOTAL: DIP Financing & Cash Collateral			**57.30**	**99,952.00**

Discovery

1 October 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.40	2,940.00
1 October 2025	Download production MODV_009 (0.2); extract production (0.3); gather document counts and provide to case team (0.1); forward cover letter to case team (0.2); stage and assign EID for new data (0.3); coordinate production loading with tech team (0.1).	K Chen	1.20	588.00
1 October 2025	Assist with production upload (0.5); map metadata and	G Chemborisov	2.00	980.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	run optical character recognition (0.4); update index (0.2); set up requested searches (0.9).			
2 October 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.40	2,940.00
2 October 2025	Review board meeting minutes produced in response to discovery requests.	B Kakani	2.80	2,436.00
2 October 2025	Document review.	J Walz	2.50	2,175.00
2 October 2025	Quality control received production load (0.8); release to case team and provide production summary (0.2); create new user and add group (0.1); send new user logon email (0.1); batch documents for case team review (1.0).	K Chen	2.20	1,078.00
2 October 2025	Assist with production upload (0.6); map metadata and run optical character recognition (0.3); update index (0.2); set up requested searches (0.9).	G Chemborisov	2.00	980.00
3 October 2025	Conference call with Committee advisors re: DIP Financing order and Plan discovery.	S Greissman	0.50	1,250.00
3 October 2025	Outline Plan and discovery valuation issues.	J Zakia	0.90	1,980.00
3 October 2025	Correspond with W&C team re: discovery and deposition preparation issues.	G Pesce	1.40	2,940.00
3 October 2025	Email among W&C re: discovery (0.9); call with E. Smith re: same (0.2); create document request tracker for A. Zatz (1.7); review documents received from Committee (2.9).	A Chase	5.70	9,006.00
3 October 2025	Emails with A. Chase, E. Smith, L. Miranda, and document review team re: workstreams for Disclosure Statement hearing.	A Hong	0.20	274.00
3 October 2025	Conduct document review (9.5); Organize and sort relevant timeline documents (2.3).	J Bourgault	11.80	10,266.00
3 October 2025	Review documents produced in response to discovery requests.	B Kakani	2.70	2,349.00
3 October 2025	Identify business heads of business segments of company.	J Walz	1.30	1,131.00
3 October 2025	Export productions MODV_008 to PDFs (0.7); export Excel natives for MODV_008 (0.2); export production MODV_009 to PDFs (0.6).	K Chen	1.50	735.00
4 October 2025	Confer with Alix team re: Plan discovery.	J Zakia	0.40	880.00
4 October 2025	Calls with C. Shore and L. Miranda, A. Chase re: DIP Financing hearing testimony and discovery (1.2); correspondence with opposing counsel re: discovery	E Smith	2.60	4,238.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.6); coordination with Alix re: outstanding diligence requests. (0.8).			
4 October 2025	Organize and review relevant timeline documents.	J Bourgault	4.00	3,480.00
4 October 2025	Identify board members for interview.	J Walz	0.90	783.00
4 October 2025	Assist with production upload (0.6); map metadata and run optical character recognition (0.3); update index (0.2); set up requested searches (0.9).	G Chemborisov	2.00	980.00
5 October 2025	Review DIP Financing order and Plan discovery.	S Greissman	2.50	6,250.00
5 October 2025	Correspondence re: discovery with Latham (0.6); discuss outstanding discovery and diligence with L. Miranda and Alix team (0.7).	E Smith	1.30	2,119.00
5 October 2025	Review documents produced in response to discovery requests.	B Kakani	2.00	1,740.00
5 October 2025	Review document review protocol and document production for relevance and chronology.	A Quintana	1.50	1,305.00
6 October 2025	Meeting/call with parties re: Plan discovery (0.8); review discovery drafts (0.9).	S Greissman	1.70	4,250.00
6 October 2025	Review production materials.	J Shore	4.70	11,750.00
6 October 2025	Prepare for and participate in meet and confer with opposing counsel re: Plan discovery (1.0); review discovery requests to lenders (0.4); outline key expert issues (0.4).	J Zakia	1.80	3,960.00
6 October 2025	Commenting on requests for production and deposition requests for secured lenders (1.0); and discovery call with L&W (0.5).	A Zatz	1.50	3,150.00
6 October 2025	Telephone call with W&C team re: scheduling and discovery (0.5); review stipulation (0.2).	C Koster	0.70	1,330.00
6 October 2025	Review board materials (2.0); prepare for meet and confer and summarize discovery issues for C. Shore (2.0); meet and confer with Debtors counsel (1.0); draft initial discovery schedule and discuss with W&C team (1.2); correspondence with Debtors counsel re: schedule and outstanding discovery (1.0).	E Smith	7.20	11,736.00
6 October 2025	Internal call re: document review (0.5); review and revise draft discovery to secured lenders (0.8); call with E. Smith to prepare for meet and confer (0.3); meet and confer among W&C and LW (0.6); review draft scheduling order (0.4); confer with L. Miranda re: discovery (0.3).	A Chase	2.90	4,582.00
6 October 2025	Call with E. Smith, A. Chase, L. Miranda, and W&C team re: document review.	A Hong	0.50	685.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 October 2025	Review discovery requests to Debtors re: 9019 motion (0.9); confer with W&C team re: discovery requests (0.2); confer with A. Chase re: discovery requests (0.2).	J Yoo	1.30	1,781.00
6 October 2025	Draft discovery requests and deposition notices for lenders (1.4); revise same with comments from E. Smith and A. Chase (0.7); emails with A. Chase and E. Smith re: same (0.2); draft discovery requests and deposition notices to Debtors (2.1); review UHC motion re: same (0.6); review edits from J. Yoo re: same (0.3); email to W&C re: same (0.1); revise discovery requests and deposition notices for lenders with comments from A. Zatz (1.2); review status of document review (0.6); emails with W&C re: same (0.1); discussion with C. Chitwan re: document review (0.3); review diligence tracker (0.3); email with B. Kakami re: same (0.1); call with W&C re: document review (0.5).	L Miranda	8.50	10,370.00
6 October 2025	Review produced documents (2.4); call with W&C team re: same (0.6).	A Aquije	3.00	3,330.00
6 October 2025	Correspondence with K. Wick and L. Miranda re: matter (0.2); attend call re: document review with L. Miranda, A. Chase, E. Smith and other W&C team members (0.5).	C Chitwan	0.70	777.00
6 October 2025	Attend call with W&C team re: document review.	G Zahiremami	0.30	297.00
6 October 2025	Attend discovery strategy & update meeting (0.5); Organize and review relevant timeline documents (3.3); Conduct Document Review (5.4); Research 2L holder information (1.6).	J Bourgault	10.80	9,396.00
6 October 2025	Conference with A. Chase, J. Walz, L. Miranda to discuss updates and next steps re: investigation (0.5); review document review protocol re: investigation (2.7).	C Isaac	3.20	2,784.00
6 October 2025	Review documents produced in response to discovery requests (2.4); draft proposed scheduling order (1.4).	B Kakani	3.80	3,306.00
6 October 2025	Review document production to organize materials (2.3); Meeting with E. Smith and A. Case re: case strategy and outcome of Disclosure Statement hearing (0.5).	A Quintana	2.80	2,436.00
6 October 2025	Map out company's D&Os over time (2.7); document review (3.7); call with associates' team re: document review (0.5); discussion with A. Aquije and B. Kakani re: same (0.1).	J Walz	7.00	6,090.00
6 October 2025	Re-enable Relativity user account (0.2); add user to Relativity user group (0.2); prepare and send login instructions (0.4).	K Chen	0.80	392.00
7 October 2025	Review discovery to Debtors and First Lien Lenders.	S Greissman	0.80	2,000.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 October 2025	Calls and emails with Alix & W&C teams re: discovery (1.0); attend call with Committee advisors (0.5); attend W&C team meetings (0.6).	J Shore	2.10	5,250.00
7 October 2025	Review and revise discovery requests.	J Zakia	1.10	2,420.00
7 October 2025	Emails counsel re: schedule and discovery (0.6); review discovery requests (0.3).	C Koster	0.90	1,710.00
7 October 2025	Review discovery requests to Debtors and 1Ls.	C West	0.80	1,432.00
7 October 2025	Meeting with W&C team re: document review (0.5); attention to document review (0.8); discuss discovery outstanding with Alix (0.6) and participate in standing call with Alix re: next steps (0.6); participate in call with Committee advisors re: outstanding discovery and diligence questions (1.0); review and revise discovery to 1Ls and Debtors (1.2).	E Smith	4.70	7,661.00
7 October 2025	Review and revise discovery requests re: 9019 motion (0.2); confer with L. Miranda re: discovery requests (0.1).	J Yoo	0.30	411.00
7 October 2025	Revise discovery requests and deposition notices to Debtors with comments from C. Shore (0.5); email to Debtors re: same (0.2); emails with E. Smith re: service of same (1); email with C. Shore re: discovery (0.1); review transcript re: same (0.3); revise discovery and deposition notices to lenders with additional comments from C. Shore (0.3); email to Alix re: discovery requests (0.2); email with S. Greissman re: discovery requests (0.2).	L Miranda	2.80	3,416.00
7 October 2025	Research re: public information re: debt trading.	A Aquije	0.70	777.00
7 October 2025	Conduct document review (6.9); Prepare summary of compensation committee meeting minutes & materials (2.8); Research 2L lien holders (1.0).	J Bourgault	10.70	9,309.00
7 October 2025	Conduct review of document production re: investigation.	C Isaac	1.70	1,479.00
7 October 2025	Review Disclosure Statement and document production in preparation for upcoming depositions.	A Quintana	3.10	2,697.00
7 October 2025	Identify documentation relevant to fifth amendment to credit agreement (4.0); review D&O issues research (2.2); review correspondence (0.1); document review (0.5).	J Walz	6.80	5,916.00
7 October 2025	Create external new users (0.4); add to group (0.1); send new user logon email (0.3).	K Chen	0.80	392.00
7 October 2025	Unzip Production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload	G Chemborisov	2.00	980.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).			
8 October 2025	Review Plan discovery documents and requests (0.7); review Plan and case discovery dispute (0.5); correspondence with Debtors advisor re: interview process (0.2).	S Greissman	1.40	3,500.00
8 October 2025	Meet and confers with opposing counsel re: discovery (0.4); calls re: schedule (0.2).	J Shore	0.60	1,500.00
8 October 2025	Review discovery issues (0.9); confer with W&C team and opposing counsel re: same (0.4).	J Zakia	1.30	2,860.00
8 October 2025	Attention to document review and outstanding items (1.0); review documents (2.0); correspondence with Debtors re: discovery and schedule (2.4); prepare for and lead meet and confer with 1L Lenders (0.7); meet and confer with Debtors (0.3); draft emergency scheduling motion (4.0).	E Smith	10.40	16,952.00
8 October 2025	Review draft scheduling orders (0.3); confer among E. Smith, C. Koster, L. Miranda re: scheduling order (0.7); email among W&C re: document production (0.3).	A Chase	1.30	2,054.00
8 October 2025	Document review re: Plan investigation documents (2.8); call with W&C team re: same (0.2); compile and coordinate re: important documents for team (0.3).	A Aquije	3.30	3,663.00
8 October 2025	Review of all preparatory materials and commence document review.	C Chitwan	3.10	3,441.00
8 October 2025	Attend call re: document review.	G Zahiremami	0.20	198.00
8 October 2025	Conduct document review (0.5); Research 2L holders (8.8); Research timeline issues (0.9).	J Bourgault	10.20	8,874.00
8 October 2025	Analysis of term sheets and review document production in preparation for upcoming depositions.	A Quintana	4.50	3,915.00
8 October 2025	Conduct factual research re: company's directors and officers (1.8); correspondence with A. Hong re: same (0.2); call with associates' team re: document review (0.5); document review (2.4); review correspondence re: same (0.1).	J Walz	5.00	4,350.00
8 October 2025	Quality control received production MODV_011 (0.9); create review batches (0.5); gather custodians (0.2); provide production summary to case team (0.2); per case team remove old batches (0.2); create new searches to exclude certain documents (0.3); create search to include certain documents only (0.2); re-batch out documents for case team review (0.4).	K Chen	2.90	1,421.00
9 October 2025	Calls re: Plan discovery.	J Shore	0.60	1,500.00
9 October 2025	Preparation calls with Committee advisors (0.3); call	E Smith	9.00	14,670.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	with Committee re: discovery and scheduling (1.0); Review ongoing discovery and correspondence with 1Ls and Debtors (1.0); revise and draft emergency motion (4.8) and discuss changes with J. Zakia and C. Shore (1.0); prepare for filing (0.9).			
9 October 2025	Call with L. Miranda, C. Rubel, and R. Komendowski re: discovery.	A Chase	0.20	316.00
9 October 2025	Document review re: Plan investigation.	A Aquije	1.50	1,665.00
9 October 2025	Review of documents.	C Chitwan	4.20	4,662.00
9 October 2025	Research timeline issues (2.3); Research 2L Holders (3.3); Conduct document review for D&Os (1.3).	J Bourgault	6.90	6,003.00
9 October 2025	Meeting with A. Chase re: case timeline.	C Isaac	0.40	348.00
9 October 2025	Meeting with E. Smith re: case timeline (0.3); Review document production in preparation for upcoming depositions (0.5).	A Quintana	0.80	696.00
9 October 2025	Call with W&C team re: research assignment for confirmation scheduling order (0.2); Factual research re: company's recent document production (1.9); conduct further factual research for A. Chase re: company's lenders (0.8).	J Walz	2.90	2,523.00
10 October 2025	Review Plan discovery.	S Greissman	0.50	1,250.00
10 October 2025	Review production materials.	J Shore	4.50	11,250.00
10 October 2025	Review discovery documents (0.6); confer with E. Smith re: same (0.2).	J Zakia	0.80	1,760.00
10 October 2025	Preparation for scheduling hearing and discuss with C. Shore (0.6); assist with hearing (0.5); revise scheduling order based on court's direction and discuss with team (1.3); correspondence with Debtors re: schedule and outstanding discovery and diligence items (1.0); attention document review (1.5); update to Committee (0.3); meet and confer with Quinn Emmanuel re: investigation and discovery (0.6).	E Smith	5.80	9,454.00
10 October 2025	Prepare for call among team re: case updates and discovery (0.2); call among review team re: document review and case update (0.3).	A Chase	0.50	790.00
10 October 2025	Confer with W&C team re: document review in support of investigation.	J Yoo	0.20	274.00
10 October 2025	Call with W&C team re: discovery workstreams.	A Aquije	0.30	333.00
10 October 2025	Review of documents.	C Chitwan	5.10	5,661.00
10 October 2025	Research 2L Holders (9.8); Attend strategy meeting re:	J Bourgault	10.70	9,309.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	discovery (0.3); Conduct document review (0.6).			
10 October 2025	Conduct document review re: investigation.	C Isaac	1.00	870.00
10 October 2025	Review of document production for relevance and strategy (2.2); Meeting with A. Case re: upcoming depositions and case timeline (0.2).	A Quintana	2.40	2,088.00
10 October 2025	Correspondence with J. Bourgault re: document review (0.1); review project work planning post-status conference (0.4); document review (5.6); call with W&C team re: active workstreams (0.3).	J Walz	6.40	5,568.00
10 October 2025	Provide document review support.	T Chen	0.20	98.00
10 October 2025	Create search, export PDFs and natives for MODV_011 (0.9); create search, export PDFs for MODV_007 (0.5); add new user to Relativity(0.3).	K Chen	1.70	833.00
10 October 2025	Assist with exporting requested document populations (0.4); generate PDFs (0.3); run optical character recognition (0.3).	G Chemborisov	1.00	490.00
11 October 2025	Correspondence and calls with C. Shore and Alix team re: discovery, diligence and confirmation schedule (1.9); attention to document review (1.0); revise schedule (0.8); correspondence with Debtors counsel re: same (1.0).	E Smith	4.70	7,661.00
11 October 2025	Research 2L Holders (1.2); Draft "Parties" section of Complaint (1.3).	J Bourgault	2.50	2,175.00
11 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	1.90	1,653.00
11 October 2025	Document review.	J Walz	2.60	2,262.00
11 October 2025	Unzip Production (0.3); decrypt and extract (0.4); run quality control analysis (0.4); move to staged environment (0.3); prepare for upload (0.3); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.50	1,225.00
12 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	2.10	1,827.00
12 October 2025	Review of document production for relevance and strategy ahead of upcoming depositions.	A Quintana	1.10	957.00
12 October 2025	Document review (5.5); identify and circulate hot documents re: investigation (0.3).	J Walz	5.80	5,046.00
13 October 2025	Calls and emails re: discovery (0.9); review discovery productions (4.0); emails re: schedule (0.5).	J Shore	5.40	13,500.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 October 2025	Prepare for and participate in discovery call (0.7); review discovery documents (1.4).	J Zakia	2.10	4,620.00
13 October 2025	Review discovery (0.4); review trial schedule (0.6).	C Koster	1.00	1,900.00
13 October 2025	Attention to discovery and document review (2.0) and meet with W&C team to discuss (1.5); correspondence with Debtors re: schedule and outstanding discovery (1.0).	E Smith	4.50	7,335.00
13 October 2025	Review markup of scheduling order from Debtors.	A Chase	0.30	474.00
13 October 2025	Draft diligence timeline re: received board materials.	A Aquije	1.60	1,776.00
13 October 2025	Review of documents.	C Chitwan	2.00	2,220.00
13 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	0.90	783.00
13 October 2025	Review document review protocol and document production for relevance and chronology.	A Quintana	4.00	3,480.00
13 October 2025	Conduct targeted research within produced documents re: list of holders (1.4); factual research into guarantor entities (0.4); document review (0.7).	J Walz	2.50	2,175.00
13 October 2025	Coordinate creating and adding 2 new external users.	K Chen	0.40	196.00
13 October 2025	Set up reviewers account in Relativity re: Alix users.	P Galvan	0.50	210.00
13 October 2025	Assist with adding new users and adjusting user group permission settings.	G Chemborisov	0.50	245.00
14 October 2025	Correspondence re: Plan discovery.	S Greissman	0.20	500.00
14 October 2025	Emails re: scheduling issues (0.6); review productions (3.0); information flow emails (0.5).	J Shore	4.10	10,250.00
14 October 2025	Review discovery issues (0.4); confer with W&C team re: same (0.7).	J Zakia	1.10	2,420.00
14 October 2025	Emails re: scheduling order..	C Koster	0.30	570.00
14 October 2025	Discovery and correspondence with opposing counsel (1.5); revise schedule (0.4); discuss with C. Shore and J. Zakia (0.2); discuss discovery and diligence and interviews with Alix and W&C teams (2.0); attention document review for interviews (2.0); call with Debtors advisors re: outstanding diligence (0.5).	E Smith	6.60	10,758.00
14 October 2025	Call with C. Shore, J. Zakia, E. Smith re: schedule (0.2); call with E. Smith re: same (0.2); email among W&C review team re: documents (1.0).	A Chase	1.40	2,212.00
14 October 2025	Document review re: produced documents (2.3); draft	A Aquije	3.30	3,663.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	diligence timeline re: received board materials (1.0).			
14 October 2025	Review of documents.	C Chitwan	2.00	2,220.00
14 October 2025	Conduct document review.	J Bourgault	10.10	8,787.00
14 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	1.80	1,566.00
14 October 2025	Review of document production for relevance and chronology.	A Quintana	4.00	3,480.00
14 October 2025	Identify and circulate relevant documents to broader team.	J Walz	0.90	783.00
15 October 2025	Calls and emails with W&C team re: productions (0.6); preparation for interviews (4.1).	J Shore	4.70	11,750.00
15 October 2025	Review key documents, prepare for witness interviews.	J Zakia	4.90	10,780.00
15 October 2025	Meet and confer with 1L Lenders (0.6); discuss discovery with L. Miranda re: counter parties and review documents (1.4); negotiate schedule and interviews and open discovery with Debtors counsel (2.0); discuss diligence and preparation for interviews with Alix team (1.3).	E Smith	5.30	8,639.00
15 October 2025	Call among review team re: discovery (0.2); review documents circulated by review team (1.5).	A Chase	1.70	2,686.00
15 October 2025	Emails with W&C re: Debtors management interviews (0.4); review Debtors' new document production (0.7); emails with W&C re: same (0.2); call with Paul Hastings re: document review (0.2); email with W&C re: notes from same (0.2).	L Miranda	1.70	2,074.00
15 October 2025	Document review re: produced documents (1.3); call with W&C team re: same (0.2).	A Aquije	1.50	1,665.00
15 October 2025	Attend call with W&C team re: document review.	G Zahiremami	0.30	297.00
15 October 2025	Conduct document review (8.0); Meet with document review team & provide discovery updates (0.2).	J Bourgault	8.20	7,134.00
15 October 2025	Conduct review of document production re: investigation.	C Isaac	0.80	696.00
15 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	1.70	1,479.00
15 October 2025	Review of document production for relevance and strategy.	A Quintana	3.00	2,610.00
15 October 2025	Document review (0.8); meeting with associates' team re: same (0.2).	J Walz	1.00	870.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 October 2025	Quality control production MODV_014 load (0.8); release to case team and provide production summary (0.1).	K Chen	0.90	441.00
15 October 2025	Unzip Production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.00	980.00
16 October 2025	Informal Committee interview of S. Kern (2.0); informal Committee interview of K. Shepherd (2.0); FTI/Alix diligence update call (1.0).	S Greissman	5.00	12,500.00
16 October 2025	Attend Kern and Shepard interviews (4.0); follow-up with W&C team re: same (0.6); review discovery productions (1.8).	J Shore	6.40	16,000.00
16 October 2025	Prepare for and participate in witness interviews (3.9); review key valuation documents (1.1).	J Zakia	5.00	11,000.00
16 October 2025	Review materials re: claims investigation (1.2); call with FTI/Alix re: diligence/discovery materials; (0.3).	C West	1.50	2,685.00
16 October 2025	Prepare for and participate in interviews of S. Kern and K. Shepard (4.3); provide update and participate in meetings with Committee and provide update on discovery (1.0); finalize scheduling stipulation and discuss discovery with Debtors (0.5).	E Smith	5.80	9,454.00
16 October 2025	Participate in interview of S. Kern (2.0); participate in interview of K. Shepard (2.1); call with L. Miranda re: investigation (0.3).	A Chase	4.40	6,952.00
16 October 2025	Attend portion of Kern interview.	V Sachdev	1.10	1,562.00
16 October 2025	Call with B. Kakani re: Debtors interviews (0.2); confer with D. Litz re: same (0.1); email with W&C re: Debtors interviews (0.2); attend and ask questions on W&C and Alix interview of S. Kern (2.0); attend and ask questions on W&C and Alix interview of K. Shepard (2.1); prepare for interview of K. Shepard (0.4).	L Miranda	5.00	6,100.00
16 October 2025	Document review re: produced documents.	A Aquije	1.80	1,998.00
16 October 2025	Review of documents.	C Chitwan	1.50	1,665.00
16 October 2025	Conduct document review (6.4); Attend K. Shepard interview (2.2); revise K. Shepard & S. Kern interview notes for W&C team (3.2).	J Bourgault	11.80	10,266.00
16 October 2025	Participate in interview with S. Kern (2.0); review documents received from Debtors re: discovery requests (1.1).	B Kakani	3.10	2,697.00
16 October 2025	Review of document production for relevance and	A Quintana	2.50	2,175.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	strategy.			
16 October 2025	Coordinate meeting for interview of C. Shandler (0.1); Document review (1.9).	J Walz	2.00	1,740.00
17 October 2025	Attend Shandler interview (2.2); attend W&C team meeting (0.5); emails re: information flow (0.2).	J Shore	2.90	7,250.00
17 October 2025	Prepare for and participate in witness interview (2.2); review key discovery documents (0.5).	J Zakia	2.70	5,940.00
17 October 2025	Calls with L. Miranda and A. Chase re: discovery workstreams (0.7); calls with C. Shore re: interviews (0.2); calls with Alix partners re: interview preparation (0.5); preparation for and participate in interview of C. Shandler (2.3).	E Smith	3.70	6,031.00
17 October 2025	Review emails from E. Smith and Alix Partners re: discovery disputes (0.6); call among W&C and Alix to prepare for Shandler interview (0.2); participate in interview of C. Shandler (2.0); summarize interview with C. Shandler for E. Smith, J. Waltz, L. Miranda (0.7).	A Chase	3.50	5,530.00
17 October 2025	Attend call with W&C and Alix re: Debtors management interviews (0.2); attend and take notes on interview of C. Shandler (1.9); email with J. Walz re: notes on same (0.4); review document production from Debtors (0.5); email with A. Chase and E. Smith re: same (0.1): email with C. Isaac re: document review (0.1).	L Miranda	3.20	3,904.00
17 October 2025	Document review re: produced documents.	A Aquije	2.00	2,220.00
17 October 2025	Review and share list of hot documents with A. Aquije and J. Walz (0.8); review term sheets and other documents, and emails with L. Miranda re: same (2.8).	C Chitwan	3.60	3,996.00
17 October 2025	Research backstop lenders & 2L holders (1.2); Conduct document review (7.3).	J Bourgault	8.50	7,395.00
17 October 2025	Conduct document review re: investigation.	C Isaac	3.00	2,610.00
17 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	2.70	2,349.00
17 October 2025	Review document production for relevance and strategy.	A Quintana	4.00	3,480.00
17 October 2025	Call with E. Smith re: upcoming interview of C. Shandler (FTI) (0.2); attend and take notes at interview of C. Shandler (1.9); revise, clean up notes of meeting (2.0); review hot documents (1.6); document review (0.5).	J Walz	6.20	5,394.00
17 October 2025	Quality control production load MODV_CH11_001 (0.7); create batch search and batch out documents for	K Chen	1.30	637.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	review (0.3); release production and provide production summary (0.3).			
17 October 2025	Unzip Production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.00	980.00
18 October 2025	Emails re: discovery issues.	J Shore	0.30	750.00
18 October 2025	Review expert report of Zul Jamal.	E Smith	1.00	1,630.00
18 October 2025	Review document production from Paul Hastings (0.6); run searches on documents re: same (0.3).	L Miranda	0.90	1,098.00
18 October 2025	Document review re: produced documents.	A Aquije	0.20	222.00
18 October 2025	Review of documents.	C Chitwan	0.90	999.00
18 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	2.30	2,001.00
18 October 2025	Review and disseminate hot documents (1.0); document review (0.4).	J Walz	1.40	1,218.00
18 October 2025	Unzip Productions (0.5); decrypt and extract (0.5); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.3); run quality control (0.3); run optical character recognition and update index (0.2).	G Chemborisov	3.00	1,470.00
19 October 2025	Email with A. Quintana re: hot documents from document review (0.2); review documents from data room re: prepetition transactions (0.7); email to W&C re: same (0.3).	L Miranda	1.20	1,464.00
19 October 2025	Review of documents.	C Chitwan	1.40	1,554.00
19 October 2025	Research ModivCare lenders and equity holders (4.7); Conduct document review (0.5).	J Bourgault	5.20	4,524.00
19 October 2025	Conduct document review re: investigation.	C Isaac	0.70	609.00
19 October 2025	Document review (0.7); flag hot document and prepare description for team (0.1).	J Walz	0.80	696.00
20 October 2025	Follow-up on interviews (1.1); Emails re: discovery issues (1.4).	J Shore	2.50	6,250.00
20 October 2025	Call to discuss missing diligence and discovery with L. Miranda (0.7); correspondence with Debtors re: same (0.6).	E Smith	1.30	2,119.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 October 2025	Call among W&C review team re: document production (0.2); review and revise update from L. Miranda re: discovery status (0.9).	A Chase	1.10	1,738.00
20 October 2025	Review Debtors' responses and objections to UHC discovery (0.4); email with A. Chase and E. Smith re: same (0.2); review document production summary for A. Chase and E. Smith (0.7); email with A. Chase and E. Smith re: same (0.2); email with R. Beil re: document request (0.1); attend call with W&C re: document review (0.2).	L Miranda	1.80	2,196.00
20 October 2025	Call with W&C team re: discovery workstream (0.3); document review re: produced documents (1.5).	A Aquije	1.80	1,998.00
20 October 2025	Catch-up call on document review with L. Miranda, A. Chase, and other W&C team members (0.3); review of documents (4.0); correspondence on matter with L. Miranda (0.1).	C Chitwan	4.40	4,884.00
20 October 2025	Conduct document review (10.8); Attend document review team meeting (0.2).	J Bourgault	11.00	9,570.00
20 October 2025	Conference call with A. Chase re: matter updates (0.2); Conduct document review re: investigation (2.2).	C Isaac	2.40	2,088.00
20 October 2025	Review documents received from Debtors re: discovery requests.	B Kakani	1.70	1,479.00
20 October 2025	Review of document production for relevance and strategy.	A Quintana	4.00	3,480.00
20 October 2025	Document review (4.1); attend check-in call with associate team re: same (0.2).	J Walz	4.30	3,741.00
20 October 2025	Unzip Production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.00	980.00
21 October 2025	Conference call with W&C and Alix Partners re: diligence and status.	S Greissman	0.90	2,250.00
21 October 2025	Emails re: discovery issues.	J Shore	1.10	2,750.00
21 October 2025	Correspondence with Debtors re: UHC discovery and other diligence (0.8); review documents (1.5); coordinating call with Alix partners re: workstreams (0.2).	E Smith	2.50	4,075.00
21 October 2025	Call among Debtors and Committee advisors re: diligence.	A Chase	0.30	474.00
21 October 2025	Review documents responsive to UHC document request (2.8); email with W&C re: same (0.3); email	L Miranda	4.40	5,368.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	with litigation support team re: same (0.2); emails with J. Walz and A. Aquije re: UHC documents (0.3); review hot documents summary from A. Aquije re: UHC (0.8).			
21 October 2025	Document review re: produced documents (3.0); document review re: 9019 settlement documents (1.5); draft summary re: same to W&C team (0.4).	A Aquije	4.90	5,439.00
21 October 2025	Review documents (7.9); emails with L. Miranda re: same (0.6); send hot documents to W&C team (0.3).	C Chitwan	8.80	9,768.00
21 October 2025	Conduct document review.	J Bourgault	5.50	4,785.00
21 October 2025	Conduct document review re: investigation.	C Isaac	2.60	2,262.00
21 October 2025	Review document production for relevance and strategy (0.9); Organizing and dating particularly interesting and relevant documents re: investigation (2.2).	A Quintana	3.10	2,697.00
21 October 2025	Review correspondence re: active workstreams (0.2); document review (5.1); identify and circulate hot documents (2.2); coordination with A. Quintana re: hot documents tracker (0.4).	J Walz	7.90	6,873.00
21 October 2025	Quality control production MODV_016 and release to case team with production summary (0.8); create batch searches and batch out documents for case team review (0.4); update batch searches with search terms; re-batch documents for review (0.9).	K Chen	2.10	1,029.00
21 October 2025	Assist with setting up requested searches (0.3); batch out review populations (0.3); generate reports (0.4).	G Chemborisov	1.00	490.00
22 October 2025	Attention to discovery and document review.	E Smith	1.00	1,630.00
22 October 2025	Call among review team re: document review.	A Chase	0.30	474.00
22 October 2025	Review diligence and hot documents re: same.	L Miranda	0.70	854.00
22 October 2025	Call with L. Miranda, A. Chase and other W&C team members on document review (0.4); review documents (7.1); emails with L. Miranda re: same (0.4).	C Chitwan	7.90	8,769.00
22 October 2025	Attend call re: document review.	G Zahiremami	0.30	297.00
22 October 2025	Conduct document review (4.3); Meet with document review team & provide updates (0.4).	J Bourgault	4.70	4,089.00
22 October 2025	Review documents produced by Debtors in response to discovery requests.	B Kakani	3.60	3,132.00
22 October 2025	Meeting with A. Chase and L. Miranda re: investigation (0.4); Organizing and dating particularly interesting and relevant documents re: investigation (1.0); Review of documents re: investigation (3.2).	A Quintana	4.60	4,002.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 October 2025	Discussion with C. Chitwan re: document review (0.1); correspondence with A. Quintana re: hot document tracker (0.1); identify shortlist of key hot documents (3.2); document review (3.7); attend associates' team call re: same (0.3).	J Walz	7.40	6,438.00
23 October 2025	Alix/FTI diligence call.	S Greissman	0.50	1,250.00
23 October 2025	Emails re: information flow (0.4); review discovery production (1.1); Emails re: discovery issues (0.4).	J Shore	1.90	4,750.00
23 October 2025	Review expert materials and hot documents (2.5); confer with W&C team re: same (0.7).	J Zakia	3.20	7,040.00
23 October 2025	Calls with Committee re: update on discovery.	E Smith	0.70	1,141.00
23 October 2025	Review hot documents flagged by document review (1.4); review draft of hot documents for broader team (0.6); email with J. Walz re: same (0.2).	L Miranda	2.20	2,684.00
23 October 2025	Document review re: produced documents.	A Aquije	2.00	2,220.00
23 October 2025	Review documents.	C Chitwan	7.30	8,103.00
23 October 2025	Conduct document review.	J Bourgault	7.50	6,525.00
23 October 2025	Conduct document review re: investigation.	C Isaac	2.20	1,914.00
23 October 2025	Review documents produced by Debtors in response to discovery requests.	B Kakani	0.30	261.00
23 October 2025	Document review (2.4); review correspondence re: document review (0.2).	J Walz	2.60	2,262.00
24 October 2025	Call with W&C litigation team re: litigation (0.7); emails with W&C team re: discovery (1.0); review discovery productions (1.2).	J Shore	2.90	7,250.00
24 October 2025	Prepare for and participate in team call re: litigation issues (0.5); outline key issues for discovery (0.4); review key documents (1.2).	J Zakia	2.10	4,620.00
24 October 2025	Calls to discuss objection and UHC discovery and general litigation coordinating call with C. Shore (2.0); correspondence on open discovery items with 1Ls and Debtors (1.0); attention document review (1.0).	E Smith	4.00	6,520.00
24 October 2025	Call among litigation team re: discovery strategy (0.7); calls with E. Smith, L. Miranda, J. Waltz re: same (0.6); analyze document review metrics to prepare for call among review team (0.4); call among review team re: document productions (0.2); review and revise hot document chart (3.3).	A Chase	5.20	8,216.00
24 October 2025	Review UHC document production (0.4); email with B. Kakani re: depositions of C. Shandler (0.2); email with	L Miranda	3.10	3,782.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	J. Walz re: UHC document production (0.2); email with C. Shore with key documents on UHC (0.7); email with J. Walz and J. Bourgault re: hot documents (0.3); email with W&C re: lender production of documents (0.2); attend W&C document review meeting (0.2); review and revise hot documents tracker (0.9).			
24 October 2025	Email hot documents to L. Miranda (0.3); continue reviewing documents (3.4); call re: document review with L. Miranda, A. Chase and other W&C team members (0.2).	C Chitwan	3.90	4,329.00
24 October 2025	Conduct document review (8.1); Attend document review team meeting & provide updates (0.2); Research deposition materials (0.5).	J Bourgault	8.80	7,656.00
24 October 2025	Conference with A. Chase re: matter update and next steps (0.5); conduct document review re: investigation (4.8).	C Isaac	5.30	4,611.00
24 October 2025	Prepare for deposition of C. Shandler re: UHC settlement motion.	B Kakani	1.30	1,131.00
24 October 2025	Meeting with A. Chase and L. Miranda re: investigation (0.2); Review of documents re: investigation (2.8).	A Quintana	3.00	2,610.00
24 October 2025	Update key documents chart (2.1); attend case litigation workstreams call with J. Zakia, E. Smith., C. Shore, A. Chase, L. Miranda, C. West (0.7); attend follow-up discussion with E. Smith, A. Chase, and L. Miranda (0.5); attend call with document review team re: document review (0.3).	J Walz	3.60	3,132.00
24 October 2025	Quality control production MODV_017 load and release to case team with production summary (0.8); create keyword search and batch out documents (0.9).	K Chen	1.70	833.00
24 October 2025	Unzip Production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.00	980.00
25 October 2025	Calls and correspondence with C. Shore and L. Miranda re: discovery (0.6); correspondence re: open items with Debtors' counsel (0.5).	E Smith	1.10	1,793.00
25 October 2025	Review responses and objections to discovery requests.	A Chase	0.60	948.00
25 October 2025	Draft C. Shandler deposition outline re: UHC (3.1); review diligence re: same (1.4); email with Committee members re: same (0.1); email with E. Smith re: same (0.1).	L Miranda	4.70	5,734.00
25 October 2025	Conduct document review.	J Bourgault	7.30	6,351.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 October 2025	Organizing and dating interesting and relevant documents re: investigation.	A Quintana	0.50	435.00
26 October 2025	Correspondence re: deposition and discovery open items with Latham team.	E Smith	0.40	652.00
26 October 2025	Continue to draft C. Shandler deposition outline re: UHC (0.9); email with C. Shore re: same (0.1).	L Miranda	1.00	1,220.00
26 October 2025	Review documents.	C Chitwan	1.00	1,110.00
26 October 2025	Conduct document review.	J Bourgault	9.70	8,439.00
26 October 2025	Review documents produced by Debtors in response to discovery requests.	B Kakani	2.10	1,827.00
26 October 2025	Organizing and dating relevant documents re: investigation (0.5); Review of documents re: investigation (1.0).	A Quintana	1.50	1,305.00
26 October 2025	Review hot documents (0.3); document review (9.1); review correspondence re: same (0.2); review of documents re: Shandler deposition (0.7).	J Walz	10.30	8,961.00
27 October 2025	Preparation for Shandler deposition (1.6); review discovery production (2.8).	J Shore	4.40	11,000.00
27 October 2025	Calls and preparation for deposition with L. Miranda and C. Shore.	E Smith	0.70	1,141.00
27 October 2025	Draft list of potential deponents re: prepetition transactions (0.4); email with W&C re: same (0.1); review diligence re: same (0.3); review new hot documents re: prepetition transactions and events (1.3); review Lender's document production summary (0.4); review underlying diligence re: same (0.4); review additional hot documents re: prepetition transactions (1.6); email with J. Walz and A. Quintana re: same (0.2); email with Alix re: document production (0.1); emails with W&C re: deposition of C. Shandler re: UHC settlement (0.4); review exhibits for deposition of C. Shandler re: UHC settlement (1.4); call with C. Shore re: same (0.1); meet with J. Walz re: same (0.4); review additional diligence for deposition of C. Shandler re: UHC settlement (1.4); review revised deposition outline for C. Shandler with comments from C. Shore (1.2).	L Miranda	9.70	11,834.00
27 October 2025	Review documents.	C Chitwan	4.80	5,328.00
27 October 2025	Conduct document review (9.2); Compile deposition documents (1.0); Formulate deposition questions list (0.9).	J Bourgault	11.10	9,657.00
27 October 2025	Conduct document review re: investigation.	C Isaac	7.50	6,525.00
27 October 2025	Prepare for C. Shandler deposition in advance of UHC	B Kakani	2.10	1,827.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	settlement motion (0.7); review documents produced by Debtors in response to discovery requests (1.4).			
27 October 2025	Review of documents re: investigation and summarizing for circulation to broader investigation team.	A Quintana	7.90	6,873.00
27 October 2025	Document review (0.2); identify potential deponents (0.5); call with C. Shore and L. Miranda re: Shandler deposition (0.3); discussion with L. Miranda re: same (0.3); prepare documents for hearing (0.6).	J Walz	1.90	1,653.00
28 October 2025	Monitor Shandler deposition (2.0); follow up re: same (0.5); review 1L "statement" (0.2); Monitor weekly status call with Alix re: diligence (0.5); review draft expert request (1.5).	S Greissman	4.70	11,750.00
28 October 2025	Preparation for Shandler deposition (4.3); attend Shandler deposition (2.3); calls re: depositions and standing challenges (1.1).	J Shore	7.70	19,250.00
28 October 2025	Confer with C. Shore re: case strategy.	J Zakia	0.40	880.00
28 October 2025	Review/analyze draft expert report (0.8); attend Shandler deposition (partial) (1.0).	C West	1.80	3,222.00
28 October 2025	Attention to discovery and depositions (1.4); correspondence with counsel re: depositions and other open items (1.2); assist with C. Shandler deposition (2.1).	E Smith	4.70	7,661.00
28 October 2025	Call with E. Smith re: discovery (0.2); email among W&C re: deposition notices (0.8).	A Chase	1.00	1,580.00
28 October 2025	Prepare for deposition of C. Shandler re: UHC settlement (0.6); confer with J. Walz re: same (0.4); calls with C. Shore re: same (0.4); email to B. Kakani re: deposition notices (0.2); call with A. Chase re: same (0.1); review Debtors' document production (0.8); email with A. Chase and E. Smith re: same (0.1); review documents from targeted searches re: prepetition transactions (1.2).	L Miranda	3.80	4,636.00
28 October 2025	Send summary to team re: hot documents.	A Aquije	0.20	222.00
28 October 2025	Review documents (3.8); discussions with L. Miranda re: chapter 11 cases (0.2).	C Chitwan	4.00	4,440.00
28 October 2025	Conduct document review.	J Bourgault	8.70	7,569.00
28 October 2025	Conduct document review re: investigation.	C Isaac	8.20	7,134.00
28 October 2025	Draft notices of deposition (0.3); review documents produced by Debtors in response to discovery requests (1.3).	B Kakani	1.60	1,392.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
28 October 2025	Review of documents re: investigation.	A Quintana	6.70	5,829.00
28 October 2025	Review relevant documents ahead of deposition of C. Shandler (1.8); discussion with G. Zahiremami re: same (0.1); review hot documents (0.4); correspondence with J. Bourgault re: same (0.2); discussion with L. Miranda re: deposition of C. Shandler (0.2); document review (1.2); attend deposition of C. Shandler (2.4); prepare cross-examination outline for C. Shandler (0.3).	J Walz	6.60	5,742.00
28 October 2025	Quality control production MODV_018 load and release to case team with production summary (1.1); compile and update production tracking log for all produced and received productions (0.4); create batch search and batch out production documents for review (0.6).	K Chen	2.10	1,029.00
28 October 2025	Unzip Production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.00	980.00
29 October 2025	Outline key issues for fact depositions (0.4); review hot documents (1.8).	J Zakia	2.20	4,840.00
29 October 2025	Calls with Alix re: discovery and upcoming workstreams (0.6); call with Committee members and provide updates (0.8); emails with Debtors re: discovery (0.9); review documents (1.9); assist with hearing (1.5); discuss documents with R. Biel (0.3).	E Smith	6.00	9,780.00
29 October 2025	Document review re: produced documents.	A Aquije	2.00	2,220.00
29 October 2025	Call with L. Miranda, E. Smith and litigation team on document review and status of pending matters.	C Chitwan	0.40	444.00
29 October 2025	Conduct document review (0.5); Attend document review team meeting and provide updates (0.4).	J Bourgault	0.90	783.00
29 October 2025	Conduct review of document production re: investigation.	C Isaac	7.00	6,090.00
29 October 2025	Draft notices of deposition (1.1); review documents produced by Debtors in response to discovery requests (2.1).	B Kakani	3.20	2,784.00
29 October 2025	Review of documents re: investigation (4.3); Meeting with E. Smith and L. Miranda re: upcoming depositions (0.4).	A Quintana	4.70	4,089.00
29 October 2025	Revise C. Shandler cross-examination outline (5.6); review C. Shandler deposition transcript (0.6); review of Debtors' reply to settlement objection (0.4); review of C. Shandler cross-examination outline (0.7).	J Walz	7.30	6,351.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 October 2025	Create term searches (0.3); remove term search documents from existing batches (0.3); create review batches for term search documents and provide batch information to case team (0.5).	K Chen	1.10	539.00
29 October 2025	Assist with setting up requested searches (0.5); batch out review populations (0.2).	G Chemborisov	0.70	343.00
30 October 2025	Review outstanding discovery issues.	J Zakia	0.50	1,100.00
30 October 2025	Attention to document review and deposition preparation.	E Smith	3.00	4,890.00
30 October 2025	Document review re: produced documents.	A Aquije	1.80	1,998.00
30 October 2025	Review documents (0.9); emails with R. Beil re: documents reviewed (0.1).	C Chitwan	1.00	1,110.00
30 October 2025	Conduct review of document production re: investigation.	C Isaac	8.00	6,960.00
30 October 2025	Review documents produced by Debtors in response to discovery requests (4.2); update notices of depositions (0.9).	B Kakani	5.10	4,437.00
30 October 2025	Review of and cataloging documents re: investigation.	A Quintana	5.50	4,785.00
30 October 2025	Prepare for call with C. Shore (0.1); meeting with C. Shore re: documents for hearing (0.7); revise cross-examination outline based on meeting with C. Shore (3.4).	J Walz	4.20	3,654.00
30 October 2025	Add new issue tag to coding field and panel (0.3); prepare searches for case team (0.4); prepare additional searches for case team (0.5).	K Chen	1.20	588.00
30 October 2025	Assist with setting up searches (0.7); batch out review populations (0.3).	G Chemborisov	1.00	490.00
31 October 2025	Review Alix partners draft report (2.5); Committee correspondence re: status and mediation requests (0.2); conference call with G. Klidonas re: same (0.3) conference call with D. Newman re: independent manager special report (0.4).	S Greissman	3.40	8,500.00
31 October 2025	Review discovery scheduling correspondence (0.2); confer with W&C team re: deposition schedules (0.2); review draft expert report and supporting materials (1.4).	J Zakia	1.80	3,960.00
31 October 2025	Call to discuss investigation with Quinn team (0.6); calls to discuss deposition preparation and scheduling with litigation team (2.0); attention to document review (0.5); correspondence with Debtors counsel re: same (1.0); review and discuss 1L discovery with A. Chase (1.0); calls & correspondence with W&C team re: service of deposition notices (1.0).	E Smith	6.10	9,943.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
31 October 2025	Call with E. Smith, J. Zakia, C. West, A. Hong re: depositions (0.3); call with E. Smith re: same (0.4); call with E. Smith, C. Shore, and C. West re: depositions (0.3); confer among W&C re: deposition notice to first lien lenders (1.8); review and revise draft deposition notices to Debtors (0.9).	A Chase	3.70	5,846.00
31 October 2025	Call with J. Zakia, C. West, E. Smith, and A. Chase re: depositions (0.2); emails with E. Smith, A. Chase, and L. Miranda re: deponents (0.5); review correspondence re: deposition scheduling (0.5); emails with A. Chase, L. Miranda, and team re: deposition preparation (0.5); emails with C. Shore, J. Zakia, and team re: depositions (0.5); call with C. Shore, C. West, E. Smith, and A. Chase re: depositions (0.2); call with E. Smith and A. Chase re: deposition notices (0.2); emails with E. Smith, A. Chase, and L. Miranda re: chart, deposition notices to Debtors, deposition subpoena to 1L financial advisor (1.0); revise deposition notices (0.5); finalize and serve deposition notices (0.5).	A Hong	4.60	6,302.00
31 October 2025	Review hot documents flagged by W&C team (1.3); email with W&C re: same (0.2); review hot documents tracker for depositions (1.4); confer with A. Aquije re: same (0.1); emails with W&C re: depositions (0.6); emails with litigation support team re: targeted searches (0.4); email with Alix re: deposition of B. Gutierrez (0.2); emails with A. Hong re: deposition of first lien lenders (0.2); review diligence re: deposition of B. Gutierrez (1.3).	L Miranda	5.70	6,954.00
31 October 2025	Review documents.	C Chitwan	4.00	4,440.00
31 October 2025	Conduct review of document production re: investigation.	C Isaac	7.60	6,612.00
31 October 2025	Review documents produced by Debtors in preparation of deposition (3.8); revise deposition notices (0.4).	B Kakani	4.20	3,654.00
31 October 2025	Review of documents re: investigation.	A Quintana	3.80	3,306.00
31 October 2025	Research re: director tenure.	J Walz	0.50	435.00
31 October 2025	Review and validate search terms from case team (0.6); create search term report based on terms (0.3); export and format search term hits report (0.4); create final search using STR (0.2); removed documents from batches (0.3); re-batch documents for review and provide batch information to case team (0.5).	K Chen	2.30	1,127.00
31 October 2025	Assist with setting up requested searches (0.7); batch out document review populations (0.3).	G Chemborisov	1.00	490.00
SUBTOTAL: Discovery			**982.10**	**1,173,050.00**

Exclusivity, Plan & Disclosure Statement

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 October 2025	Review Disclosure Statement objection and supporting declarations.	S Greissman	2.10	5,250.00
1 October 2025	Review Plan and Disclosure Statement.	J Shore	2.00	5,000.00
1 October 2025	Review Plan and Disclosure Statement (1.9); call with M. Gates, R. Komendowski and J. Amico (0.5).	A Ericksen	2.40	5,280.00
1 October 2025	Review draft Disclosure Statement objection (0.5); review Plan discovery and valuation dispute issues (0.9).	J Zakia	1.40	3,080.00
1 October 2025	Internal call re: Disclosure Statement objection (1.2); call with Alix re: rights offering (0.1); revising Disclosure Statement objection (1.3); revising Disclosure Statement objection declaration (0.4).	A Zatz	3.00	6,300.00
1 October 2025	Revise Disclosure Statement objection.	C Koster	0.60	1,140.00
1 October 2025	Calls and correspondence with C. Shore, A. Zatz re: Disclosure Statement Objection and Declaration (1.0); calls and correspondence with W&C team re: supporting evidence (1.6); review and revise and include edits from Alix team (2.3).	E Smith	4.90	7,987.00
1 October 2025	Review portion of Disclosure Statement (0.9); review draft Disclosure Statement objection (1.2); call among W&C re: Smith Declaration (0.5); review Smith Declaration (1.5); confer with L. Miranda re: exhibits for Smith Declaration (0.6).	A Chase	4.70	7,426.00
1 October 2025	Emails with A. Zatz, E. Smith, A. Chase, and R. Beil re: declaration for Disclosure Statement objection (0.5); revise draft declaration in support of Disclosure Statement objection (2.5); prepare exhibits for Disclosure Statement objection declaration (1.5); emails with E. Smith, L. Miranda, and K. Wick re: exhibits for declaration (0.3); emails with E. Smith, A. Chase, L. Miranda, and R. Beil re: declaration exhibits (0.3); revise declaration per Alix comments (0.5); revise declaration per E. Smith comments (1.0); call with C. Shore, E. Smith, A. Chase, R. Beil, and W&C team re: Disclosure Statement objection and declaration (0.4).	A Hong	7.00	9,590.00
1 October 2025	Correspond with W&C team re: Disclosure Statement objection.	B Lingle	0.40	548.00
1 October 2025	Conduct citation check of Objection re: Disclosure Statement Objection (2.0); analyze Smith Declaration and revise re: same (1.2); attend calls with litigation team re: same (0.4); analyze and confirm Declaration exhibits re: same (0.7); analyze E. Smith edits to Smith Declaration and revise re: same (0.4); analyze A. Zatz edits to Objection and revise re: same (0.7); analyze A. Zatz edits to Declaration and revise re: same (0.8).	R Beil	6.20	7,936.00
1 October 2025	Review and revise section of Disclosure Statement	L Miranda	4.10	5,002.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	objection (various iterations) (1.4); review diligence and corporate document re: same (0.4); review deposition transcript re: same (0.9); email with R. Beil re: same (0.2); prepare transcript exhibit (0.3); emails with A. Chase re: same (0.4); review exhibits to declaration in support of Disclosure Statement objection (0.3); email with A. Hong re: same (0.2).			
1 October 2025	Research re: Disclosure Statement objection and related evidentiary issues.	A Aquije	1.00	1,110.00
1 October 2025	Analyze hearing audio file re: Disclosure Statement objection (3.3); correspondence with A. Zatz, C. Shore, and E. Smith re: same (0.2).	D Mago	3.50	3,465.00
1 October 2025	Edit objection to Disclosure Statement and accompanying declaration per A. Zatz and C. Shore's comments.	B Kakani	4.70	4,089.00
1 October 2025	Confirm factual assertions in draft Disclosure Statement objection (4.3); discussion with A. Zatz and B. Kakani re: same (0.1); Call with B. Kakani, R. Beil, E. Smith, A. Hong, and C. Shore re: revisions to Disclosure Statement Objection (0.7); review work in progress tracker (0.1).	J Walz	5.20	4,524.00
1 October 2025	Prepare exhibits for Disclosure Statement Objection (1.6); correspondence with A. Hong re: same (0.3).	K Wick	1.90	931.00
2 October 2025	Review Disclosure Statement objection.	S Greissman	1.50	3,750.00
2 October 2025	Review and revise draft Disclosure Statement objection.	J Zakia	1.00	2,200.00
2 October 2025	Revising Disclosure Statement objection (1.6); related call with G. Zahiremami (0.2).	A Zatz	1.80	3,780.00
2 October 2025	Revise Disclosure Statement objection.	C Koster	0.50	950.00
2 October 2025	Calls to discuss Disclosure Statement filings with litigation team (1.0); edits and finalization of drafts to prepare for filing (2.5); assist with deposition preparation (0.5).	E Smith	4.00	6,520.00
2 October 2025	Review and revise Smith Declaration (2.2); review draft Disclosure Statement objection (1.3).	A Chase	3.50	5,530.00
2 October 2025	Emails with E. Smith, A. Chase, R. Beil, and A. Venes re: Disclosure Statement objection filing (0.5); revise declaration in support of Disclosure Statement objection (1); emails with E. Smith, A. Chase, and R. Beil re: Disclosure Statement objection and declaration (0.5); revise and finalize declaration and exhibits in support of Disclosure Statement objection (0.5); emails with E. Smith and A. Venes re: pro hac vice application for E. Smith (0.2).	A Hong	2.70	3,699.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 October 2025	Revise Disclosure Statement objection and coordinate with W&C team re: same.	B Lingle	3.40	4,658.00
2 October 2025	Draft, revise and finalize for filing Objection re: Disclosure Statement Objection (2.0); draft, revise and finalize for filing Declaration re: same (1.0); analyze C. Shore edits re: same (1.0); analyze A. Zatz edits re: same (0.3).	R Beil	4.30	5,504.00
2 October 2025	Review discovery for fact citations to Disclosure Statement objection (0.4); email with R. Beil re: same (0.2); review E. Smith declaration and exhibits (0.3).	L Miranda	0.90	1,098.00
2 October 2025	Analyze motion for class certification (0.3); draft summary email to B. Lingle and A. Zatz re: same (0.2).	D Mago	0.50	495.00
2 October 2025	Review changes to Plan of reorganization.	J Walz	0.20	174.00
3 October 2025	Review amended Plan and Disclosure Statement (1.1); review documentation in value research (0.5).	S Greissman	1.60	4,000.00
3 October 2025	Calls re: scheduling and discovery issues (0.4); review Plan and Disclosure Statement (4.5).	J Shore	4.90	12,250.00
4 October 2025	Review Plan and DIP Financing order updates.	S Greissman	0.60	1,500.00
5 October 2025	Reviewing amended Plan and Disclosure Statement (1.0); preparing for Disclosure Statement hearing (1.0); reviewing Debtors' response to Disclosure Statement objections (0.7); responding to questions from Committee on amended Plan (0.3).	A Zatz	3.00	6,300.00
5 October 2025	Review Disclosure Statement and reply (0.8); prepare for hearing (0.4).	C Koster	1.20	2,280.00
5 October 2025	Review reply in support of Disclosure Statement motion (1.0); review amended Disclosure Statement (0.7).	A Chase	1.70	2,686.00
5 October 2025	Review amended Plan and Disclosure Statement.	B Lingle	0.20	274.00
5 October 2025	Review correspondence re: Plan and Disclosure Statement amendment.	J Walz	0.20	174.00
6 October 2025	Calls and emails re: schedule and discovery update.	J Shore	1.20	3,000.00
6 October 2025	Reviewing revised Disclosure Statement order (0.7); and reviewing revised Disclosure Statement (0.4).	A Zatz	1.10	2,310.00
6 October 2025	Analyze Debtors' Reply re: Disclosure Statement hearing preparation call (0.4); attend call re: same (0.2).	R Beil	0.60	768.00
6 October 2025	Call with W&C re: Disclosure Statement hearing (0.3); email to A. Chase and E. Smith re: discovery for same (0.2); email to K. Wick re: Disclosure Statement	L Miranda	1.30	1,586.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	hearing (0.1); review changes to Disclosure Statement (0.4); review changes to Plan (0.3).			
7 October 2025	Review approved solicitation materials and filed DIP Financing order.	S Greissman	0.50	1,250.00
7 October 2025	Review Plan materials.	J Shore	2.70	6,750.00
7 October 2025	Review agreements from March 2025 exchange and consents re: unsecured notes.	A Ericksen	0.90	1,980.00
8 October 2025	Review draft scheduling order (0.3); conference call with C. Shore re: case schedule (0.2).	S Greissman	0.50	1,250.00
8 October 2025	Review Plan materials (2.3); review business plan materials (1.6).	J Shore	3.90	9,750.00
8 October 2025	Reviewing solicitation versions of Plan and Disclosure Statement.	A Zatz	0.40	840.00
8 October 2025	Review scheduling (0.5); emails chambers re: status (0.3); telephone internal re: emergency motion (0.3).	C Koster	1.10	2,090.00
8 October 2025	Call with A. Chase and E. Smith re: motion on scheduling order (0.2); draft emergency motion re: same (2.6); review discovery productions, declaration of E. Smith and background materials for same (1.3); confer with B. Kakani re: same (0.2).	L Miranda	4.30	5,246.00
8 October 2025	Cite check Emergency Motion for Scheduling Order.	J Bourgault	1.00	870.00
8 October 2025	Draft emergency motion for scheduling order.	B Kakani	3.30	2,871.00
9 October 2025	Draft emergency motion (2.4); edits to emergency scheduling motion (2.4).	J Shore	4.80	12,000.00
9 October 2025	Reviewing scheduling motion.	A Zatz	0.30	630.00
9 October 2025	Review and edit emergency motion.	C Koster	0.80	1,520.00
9 October 2025	Review emergency motion re: schedule and correspondence re: same.	C West	0.50	895.00
9 October 2025	Review and revise emergency motion re: scheduling order (2.7); call with E. Smith re: same (0.2).	A Chase	2.90	4,582.00
9 October 2025	Call with E. Smith re: scheduling order (0.2); review and revise scheduling order motion (numerous iterations) (4.7); review transcript for hearings re: same (0.3); emails with B. Kakani and J. Bourgault re: citations to scheduling order motion (0.2); incorporate comments from W&C to emergency motion for scheduling order (2.1); follow-up call with E. Smith re: same (0.1); call with C. Shore re: same (0.1); attend call with W&C re: scheduling order (0.2).	L Miranda	7.90	9,638.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 October 2025	Draft scheduling order re: confirmation timeline.	A Aquije	0.50	555.00
9 October 2025	Cite check Emergency Motion for Scheduling Order.	J Bourgault	1.20	1,044.00
9 October 2025	Prepare for, and assist with e-filing of confirmation scheduling emergency motion (0.9); service of same (0.2).	A Venes	1.10	539.00
10 October 2025	Draft schedule amendments.	J Shore	0.90	2,250.00
10 October 2025	Prepare for status conference (0.3); participate in status conference re: confirmation schedule (0.5); confer with C. Shore re: same (0.5).	J Zakia	1.30	2,860.00
10 October 2025	Call with Alix re: valuation waterfall.	A Zatz	0.50	1,050.00
13 October 2025	Review Plan/discovery issues.	S Greissman	0.50	1,250.00
13 October 2025	Reviewing proposed confirmation schedule.	A Zatz	0.20	420.00
14 October 2025	Attend discussion re: valuation with Alix and W&C teams (0.9); attend call with financial advisor (0.7); attend call re: UHC settlement (0.5).	J Shore	2.10	5,250.00
14 October 2025	Call with Alix re: valuation.	A Zatz	0.50	1,050.00
14 October 2025	Call with Alix re: valuation (0.5); review discovery and correspondence re: same (0.5).	C West	1.00	1,790.00
15 October 2025	Review final solicitation documents.	S Greissman	1.30	3,250.00
15 October 2025	Calls re: UHC settlement (1.0); calls and emails with W&C and Alix teams re: valuation (0.8).	J Shore	1.80	4,500.00
15 October 2025	Correspondence re: UHC settlement and declaration (0.2); and reviewing same (0.7).	A Zatz	0.90	1,890.00
15 October 2025	Review C. Shandler declaration in support of UHC 9019 motion (0.6); draft questions for Debtors interviews re: same (1.4); review 9019 motion on UHC settlement (0.4); email with E. Smith and A. Chase re: same (0.1).	L Miranda	2.50	3,050.00
16 October 2025	Call among Committee advisors and Debtors advisors re: valuation diligence.	A Chase	0.50	790.00
17 October 2025	Call with W&C and Alix teams re: valuation.	J Shore	0.80	2,000.00
17 October 2025	Reviewing amended Disclosure Statement.	A Zatz	0.30	630.00
17 October 2025	Email with W&C and Alix re: Debtors' valuation report.	L Miranda	0.10	122.00
18 October 2025	Review valuation (0.6); emails re: same (0.2).	J Shore	0.80	2,000.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 October 2025	Review Moelis expert report.	A Chase	2.20	3,476.00
20 October 2025	Attend call re: UHC settlement.	J Shore	1.50	3,750.00
20 October 2025	Review valuation report and supporting materials.	J Zakia	2.90	6,380.00
20 October 2025	Reviewing UHC settlement papers.	A Zatz	0.50	1,050.00
21 October 2025	Attend call re: UHC settlement.	J Shore	0.80	2,000.00
21 October 2025	Call among Alix and W&C re: valuation and diligence updates.	A Chase	0.70	1,106.00
21 October 2025	Call with E. Smith re: objection to UHC settlement (0.2); email with B. Kakani re: same (0.2); review motion and declaration in support of UHC settlement (0.6).	L Miranda	1.00	1,220.00
21 October 2025	Draft opposition to UHC settlement motion (1.3); review documents produced by Debtors in response to discovery requests (1.5).	B Kakani	2.80	2,436.00
22 October 2025	Discuss UHC 9019 strategy with C. Shore, L. Miranda.	E Smith	1.00	1,630.00
22 October 2025	Draft objection for UHC settlement (4.4); review documents re: same, including hot documents, 9019 motion, C. Shandler Declaration, and UHC agreement (1.3); call with E. Smith re: UHC settlement objection (0.3); email with C. West re: UHC objection (0.1); email with Alix re: same (0.2).	L Miranda	6.30	7,686.00
23 October 2025	Calls with Alix and W&C teams re: valuation strategy (1.8); call re: UHC objection (1.0); emails re: same (0.4).	J Shore	3.20	8,000.00
23 October 2025	Call with L&W re: surety issues (0.7); and related call with V. Sachdev (0.4).	A Zatz	1.10	2,310.00
23 October 2025	Review and revise UHC 9019 objection draft (1.0); discuss same with L. Miranda (1.0).	E Smith	2.00	3,260.00
23 October 2025	Review proposed UHC settlement and agreement and analyze termination provisions.	B Lingle	0.70	959.00
23 October 2025	Call with E. Smith re: UHC settlement objection (0.2); review and revise UHC objection with comments from E. Smith (1.7); confer with A. Chase and E. Smith re: same (0.2); email with W&C re: UHC settlement objection (0.2); review UHC hot documents (0.9); draft summary re: same (1.6); email with W&C re: same (0.1); email with Alix re: UHC (0.2).	L Miranda	5.10	6,222.00
24 October 2025	Edits to UHC settlement objection pleading.	J Shore	1.50	3,750.00
24 October 2025	Review objection to settlement and research/correspondence re: same.	C West	0.60	1,074.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
24 October 2025	Review summary of documents re: United Healthcare Settlement (1.2); review draft objection (0.4).	A Chase	1.60	2,528.00
24 October 2025	Correspond with W&C team re: UHC settlement.	B Lingle	0.40	548.00
24 October 2025	Call with A. Panda re: UHC settlement objection (0.2); review and revise UHC objection with comments from C. Shore (various iterations) (2.6); review email from Alix re: same (0.2); email with W&C re: UHC Agreement (0.3).	L Miranda	3.30	4,026.00
24 October 2025	Review of UHC settlement documents.	J Walz	0.40	348.00
26 October 2025	Revising objection to UHC settlement.	A Zatz	0.50	1,050.00
26 October 2025	Review and revise UHC objection with comments from Alix (0.3); email with W&C re: same (0.1).	L Miranda	0.40	488.00
26 October 2025	Review UHC Settlement Objection (0.2); revise same (0.8).	J Walz	1.00	870.00
27 October 2025	Review UHC settlement (0.5); review Alix draft expert report (1.8); review legal research re: documentation in value re: related plan research issues (1.6).	S Greissman	3.90	9,750.00
27 October 2025	Preparation for UHC settlement hearing (2.0); attend call re: Company valuation issues (1.8).	J Shore	3.80	9,500.00
27 October 2025	Review documents re: valuation.	J Zakia	1.20	2,640.00
27 October 2025	Review settlement objection.	C West	0.40	716.00
27 October 2025	Finalize for filing 9019 objection.	E Smith	0.60	978.00
27 October 2025	Review and revise objection UHC settlement (various iterations) with comments from C. Shore and S. Greissman (1.7); emails with W&C re: same (0.2); call with C. Shore re: same (0.2); continue to revise UHC objection for filing (0.6); review potential exhibits re: same (0.2); email with W&C re: filing of UHC objection (0.1); email with Committee re: same (0.1).	L Miranda	3.10	3,782.00
27 October 2025	Review and respond to email from L. Miranda re: assistance with e-filing of objection to 9019 motion of Debtors with UHC (0.1); prepare for and assist with e-filing of objection (0.3); serve filed version of objection (0.1); update pleadings file (0.1).	A Venes	0.60	294.00
28 October 2025	Attend discussion re: valuation with Alix and W&C teams.	J Shore	0.60	1,500.00
28 October 2025	Review draft expert report and supporting documents (1.1); prepare for and participate in advisors call (0.5).	J Zakia	1.60	3,520.00
28 October 2025	Attend portion of C. Shandler deposition re: UHC (1.3); call among W&C and Alix re: valuation (0.5).	A Chase	1.80	2,844.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
28 October 2025	Draft cross outline for hearing on October 30 re: UHC.	L Miranda	2.50	3,050.00
29 October 2025	UHC settlement hearing preparation (1.5); review Alix partners draft valuation analysis (1.5); review response to UHC settlement objection and internal follow up (0.5).	S Greissman	3.50	8,750.00
29 October 2025	Preparation for hearing (1.5); team calls re: same (1.0); prepare for Shandler cross-examination at hearing (2.1); attend call with W&C and Alix teams re: valuation (0.8).	J Shore	5.40	13,500.00
29 October 2025	Review reply re: 9019 and confer with C. Shore re: same (0.9); review draft expert report and supporting documents (1.9).	J Zakia	2.80	6,160.00
29 October 2025	Discuss UHC hearing preparation with W&C team.	E Smith	1.00	1,630.00
29 October 2025	Review reply to UHC settlement (0.2); review and revise cross examination outline for UHC hearing (1.6); call with L. Miranda and C. Shore re: same (0.2).	A Chase	2.00	3,160.00
29 October 2025	Correspond with A. Zatz and L. Miranda re: UHC reply.	V Sachdev	0.10	142.00
29 October 2025	Review diligence for cross outline of C. Shandler (0.7); call with E. Smith re: UHC hearing (0.2); email with W&C re: surety documents (0.2); review and revise cross outline for C. Shandler (1.3); email with J. Walz re: same (0.2); review Debtors' reply to UHC objection (0.6); email to Committee re: same (0.1); call with C. Shore and A. Chase re: C. Shandler outline (0.4); review and revise outline re: same with comments from C. Shore (4.2); review and revise timeline of UHC events (0.9); review and revise demonstrative for court (0.8); review exhibits for cross outline of C. Shandler (1.2).	L Miranda	10.80	13,176.00
29 October 2025	Assist with hearing preparations.	J Bourgault	2.00	1,740.00
30 October 2025	Review expert valuation and business plan materials.	J Zakia	2.80	6,160.00
31 October 2025	Follow up on UHC settlement hearing.	J Shore	0.90	2,250.00
31 October 2025	Review business plan draft report from Alix.	A Chase	3.20	5,056.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement			**247.70**	**419,061.00**

Executory Contracts & Unexpired Leases

31 October 2025	Correspondence re: assumed contracts.	A Zatz	0.10	210.00
SUBTOTAL: Executory Contracts & Unexpired Leases			**0.10**	**210.00**

Hearings & Court Matters

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 October 2025	Assist with preparation of closing argument for DIP Financing hearing.	A Chase	1.40	2,212.00
2 October 2025	Review and revise W&E list for Disclosure Statement hearing (0.6); email with A. Aquije re: same (0.1).	L Miranda	0.70	854.00
2 October 2025	Draft witness and exhibit list (0.3); further revise same, incorporating comments from A. Chase (0.2).	A Aquije	0.50	555.00
3 October 2025	DIP Financing hearing (1.8); pre-hearing internal conference call (1.2); post-hearing follow up re: DIP Financing order form and related (1.6).	S Greissman	4.60	11,500.00
3 October 2025	Preparation for (0.5) and attend DIP Financing hearing (0.7); follow-up on DIP Financing hearing (0.9).	J Shore	2.10	5,250.00
3 October 2025	Prepare for (0.3) and participate in final DIP Financing hearing (0.7); follow up discussions with W&C team re: same (0.2).	J Zakia	1.20	2,640.00
3 October 2025	Internal call in preparation for DIP Financing hearing (1.0); meeting with S. Greissman re: same (0.5); attending DIP Financing hearing (0.7).	A Zatz	2.20	4,620.00
3 October 2025	Prepare for (0.5) and attend hearing (0.7).	C Koster	1.20	2,280.00
3 October 2025	Assist with DIP Financing hearing preparation (0.6); call with C. Shore to discuss same (0.2); provide hearing assistance (1.2).	E Smith	2.00	3,260.00
3 October 2025	Confer with L. Miranda re: DIP Financing hearing (0.4); review and revise witness and exhibit list for Disclosure Statement hearing (0.5).	A Chase	0.90	1,422.00
3 October 2025	Confer with L. Miranda re: upcoming filing of witness and exhibit list (0.1); review and respond to emails with L. Miranda and A. Aquije re: same (0.1); prepare exhibit for upcoming filing (0.1); file witness and exhibit list (0.1); electronically serve on Master Service List (0.2).	D Hirshorn	0.60	294.00
5 October 2025	Preparation for Disclosure Statement hearing (3.6); calls and emails re: same (0.9).	J Shore	4.50	11,250.00
6 October 2025	Prepare for pre-hearing and internal meeting re: Disclosure Statement (1.2); Disclosure statement hearing (1.1); post hearing follow up re: solicitation materials (0.9); post hearing follow up re: final DIP Financing order (0.3).	S Greissman	3.50	8,750.00
6 October 2025	Preparation for Disclosure Statement hearing (0.5); attend same hearing (1.3); follow-up call with W&C team (0.5).	J Shore	2.30	5,750.00
6 October 2025	Prepare for (0.5) and attend Disclosure Statement hearing (1.3); follow up discussion with C. Shore re: same (0.5).	J Zakia	2.30	5,060.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 October 2025	Attending Disclosure Statement hearing.	A Zatz	2.20	4,620.00
6 October 2025	Prepare for (0.5) and attend Disclosure Statement hearing (1.3).	C Koster	1.80	3,420.00
6 October 2025	Preparation for Disclosure Statement hearing and discuss with C. Shore, J. Zakia (1.5); assist with Disclosure Statement hearing (1.0).	E Smith	2.50	4,075.00
6 October 2025	Preparation call among W&C for Disclosure Statement hearing (0.3); call among W&C re: Disclosure Statement hearing (0.6).	A Chase	0.90	1,422.00
9 October 2025	Preparation for status conference.	J Shore	2.20	5,500.00
9 October 2025	Confer with C. Shore re: preparation for status conference.	J Zakia	2.20	4,840.00
9 October 2025	Prepare for status conference.	C Koster	0.30	570.00
10 October 2025	Monitor status conference re: discovery and case schedule (1.0); follow up conference call with J. Zakia (0.2); follow up conference call with C. Shore (0.2).	S Greissman	1.40	3,500.00
10 October 2025	Preparation for status conference (0.8); status conference (0.5); follow-up calls (0.7).	J Shore	2.00	5,000.00
10 October 2025	Attending status conference on scheduling.	A Zatz	0.50	1,050.00
10 October 2025	Prepare for (0.3) and attend status conference (0.5); follow-up internal (0.4).	C Koster	1.20	2,280.00
10 October 2025	Review competing scheduling orders in preparation for hearing (0.3); call among W&C re: outcome of scheduling conference (0.2).	A Chase	0.50	790.00
27 October 2025	Draft witness and exhibit list for October 30th hearing.	L Miranda	0.40	488.00
28 October 2025	Revise witness and exhibit list for October 30th hearing (various iterations) (0.6); review Alix's findings re: exhibits for same (0.3); confer with C. Shore re: same (0.2); review exhibits re: same (0.2); email with W&C re: filing of witness and exhibit list (0.2); review Debtors' witness and exhibits list for UHC hearing (0.4); email with J. Walz re: same (0.1).	L Miranda	2.00	2,440.00
28 October 2025	File witness and exhibit list (0.5); email service of same (0.6); mail service of same (0.6).	K Wick	1.70	833.00
29 October 2025	Draft amended witness & exhibit list (0.6); email with E. Smith re: same (0.1); emails with W&C re: filing of amended and exhibit list (0.2).	L Miranda	0.90	1,098.00
29 October 2025	Emails with S. Greissman re: hearing.	G Zahiremami	0.10	99.00
29 October 2025	Finalize documents for hearing.	J Walz	1.20	1,044.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 October 2025	Review and respond to email from L. Miranda re: upcoming filing of Amended Witness and Exhibit (0.1); review and finalize exhibits for filing with Amended Witness and Exhibit List (0.2); file Amended Witness and Exhibit List (0.1); file Amended Witness and Exhibit List (0.1); electronically serve same (0.2); coordinate physical service with Copy Center and Mailroom (0.1).	D Hirshorn	0.80	392.00
29 October 2025	Prepare hearing binders (3.1); correspondence with vendor re: same (0.3); correspondence with L. Miranda re: same (0.4).	K Wick	3.80	1,862.00
30 October 2025	Monitor UHC settlement hearing (3.5); post hearing follow up (1.2).	S Greissman	4.70	11,750.00
30 October 2025	Hearing preparation (3.6); UHC hearing (3.0); follow up calls and emails (2.0).	J Shore	8.60	21,500.00
30 October 2025	Confer with C. Shore re: 9019 hearing (0.4); attend hearing (3.0); follow up discussions re: same (0.4).	J Zakia	3.80	8,360.00
30 October 2025	Attending hearing on UHC settlement motion.	A Zatz	2.40	5,040.00
30 October 2025	Prepare for (1.5) and attend UHC settlement hearing (3.0).	C Koster	4.50	8,550.00
30 October 2025	Attend 9019 hearing (virtual/partial).	C West	1.30	2,327.00
30 October 2025	Attend UHC hearing and assist with exhibits (3.0); call with C. Shore re: hearing (0.1); prepare for UHC hearing (1.2); call with E. Smith re: same (0.2); call with E. Smith and C. Shore re: same (0.2); review and revise cross outline with comments from C. Shore (1.2); review exhibits for cross binders for hearing (0.9); confer with J. Walz re: same (0.4); confer with J. Bourgault re: UHC hearing preparation (0.3); emails with K. Wick re: UHC hearing (0.2); revise UHC timeline with comments from C. Shore (0.7); call with A. Chase re: same (0.1); email with E. Smith re: exhibits for UHC hearing (0.1); emails with Latham re: same (0.2).	L Miranda	8.80	10,736.00
30 October 2025	Prepare for UHC hearing (3.3); Attend UHC hearing & transport documentation (3.0).	J Bourgault	6.30	5,481.00
30 October 2025	Prepare for hearing (1.1); debrief hearing with W&C team (1.0); finalize exhibits to be sent to court following hearing (0.3).	J Walz	2.40	2,088.00
30 October 2025	Register attorneys for hearing (0.2); correspondence with W&C team re: same (0.1); prepare final hearing materials (0.7); correspondence with vendor re: printed hearing materials (0.2); prepare exhibit demonstrative for L. Miranda (0.4).	K Wick	1.60	784.00
31 October 2025	Prepare hearing transcript order form (0.2); file order form (0.6).	K Wick	0.80	392.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
SUBTOTAL: Hearings & Court Matters			**103.80**	**188,028.00**

Investigation of Causes of Action

1 October 2025	Complete review of trademark search reports and check chains of title of IP (1.8); review confidential litigation assessment Memorandum and revise IP provisions therein (0.7); preparation of IP schedules to memorandum (1.3).	A Bagdasarian	3.80	6,004.00
1 October 2025	Drafting confidential litigation assessment memorandum and reviewing credit agreement, indenture agreement, 1L security agreement and 2L security agreement re: same (4.3); drafting confidential litigation assessment chart sections B, C, D, E and G (2.4); reviewing all loan party charters and comparing against UCC filings and summarizing discrepancies (2.6).	P Rai	9.30	10,323.00
1 October 2025	Call with A. Zatz re: diminution research (0.1); conduct research re: same (3.2).	G Zahiremami	3.30	3,267.00
2 October 2025	Review of confidential litigation assessment memo and chart.	G Silnicki	1.30	1,911.00
2 October 2025	Correspond with R. Beil, G. Zahiremami, and D. Mago re: status of tasks.	V Sachdev	0.30	426.00
2 October 2025	Draft and revise Standing Motion re: confidential litigation assessment (1.3); research 5th Cir. Committee Standing case law re: same (0.7).	R Beil	2.00	2,560.00
2 October 2025	Confer with V. Sachdev re: research (0.1); confer with A. Zatz re: diminution in value research (0.1); conduct research re: same (4.4).	G Zahiremami	4.60	4,554.00
2 October 2025	Review lien searches (0.3); obtain certified charter documents (0.2).	C Slattery	0.50	350.00
3 October 2025	Review email re: confidential litigation assessment findings and UCC filings (0.1); revise IP portions of confidential litigation assessment Memorandum (0.7).	A Bagdasarian	0.80	1,264.00
3 October 2025	Review asset-related queries from FRI team and preparation of responses.	G Silnicki	0.30	441.00
3 October 2025	Correspond with A. Chase, R. Beil, G. Zahiremami, and D. Mago re: litigation issues (0.2); review WindCo precedent (0.3).	V Sachdev	0.50	710.00
3 October 2025	Draft and revise Standing Motion re: confidential litigation assessment (1.0); research 5th Cir. committee standing case law re: same (0.5); draft and revise confidential litigation assessment chart and memo re: same (1.4).	R Beil	2.90	3,712.00
3 October 2025	Email with E. Smith re: D&Os (0.1); review board	L Miranda	2.40	2,928.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	materials re: Q1 2025 transactions (2.3).			
3 October 2025	Review of confidential litigation assessment memo.	P Rai	0.60	666.00
3 October 2025	Legal research re: effect of prepetition liens.	D Mago	1.90	1,881.00
3 October 2025	Conduct research re: diminution in value research (2.6); email same to S. Greissman and A. Zatz (0.1).	G Zahiremami	2.70	2,673.00
4 October 2025	Call with Zatz research issues (0.2); correspond with Biel, Zahiremami and Mago re: same (0.2); review research from Zahiremami re: same (0.2).	V Sachdev	0.60	852.00
4 October 2025	Review of hot documents (2.4); draft summary re: same for W&C (0.6); review document production (0.2); email with E. Smith re: same (0.1).	L Miranda	3.30	4,026.00
4 October 2025	Locate subordination agreement and email same to A. Zatz (0.2); conduct research (5.8); emails with V. Sachdev re: same (0.1).	G Zahiremami	6.10	6,039.00
6 October 2025	Correspondence with D. Newman re: investigation.	S Greissman	0.30	750.00
6 October 2025	Review correspondence and materials re: causes of action and case strategy re: same.	G Pesce	2.80	5,880.00
6 October 2025	Reviewing unsecured notes indenture.	A Zatz	0.20	420.00
6 October 2025	Team call re: case background and claims investigation (0.8); review background materials (0.7).	C West	1.50	2,685.00
6 October 2025	Call with V. Sanchez re: investigation (0.2); call with A. Hong, C. West, L. Miranda re: same (0.7); email among W&C re: investigation workstreams (0.4); call with J. Yoo re: investigation (0.2); draft interrogatories re: investigation (2.4); review credit agreements re: investigation (2.6).	A Chase	6.50	10,270.00
6 October 2025	Confer with Zatz complaint and related research (0.3); correspond with G. Zahiremami research (0.2); call with G. Zahiremami re: same (0.2); review and analyze draft confidential litigation assessment memo (0.4); research relevant code provisions (1.3); draft email summary of analysis re: same (0.4).	V Sachdev	2.80	3,976.00
6 October 2025	Emails with C. West, A. Chase, and L. Miranda re: standing motion and complaint (0.3); emails with E. Smith, A. Chase, J. Yoo, L. Miranda, V. Sachdev, and R. Beil re: discovery and challenge workstreams (0.3); call with C. West, A. Chase, and L. Miranda re: standing motion and complaint (0.7); review first day declaration, amended Disclosure Statement, and background materials for standing motion and complaint (1.4); review diligence timeline and summary from document review team re: Debtors' production of board materials (0.7).	A Hong	3.40	4,658.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 October 2025	Meeting re: standing motion / challenge (0.6); Review memo re: potential arguments for complaint (0.8).	D Litz	1.40	1,918.00
6 October 2025	Research status of litigation re: memo (2.0); review litigation re: same (1.8).	R Beil	3.80	4,864.00
6 October 2025	Review and revise timeline of key facts (0.7); email with J. Bourgault re: same (0.1); follow-up call re: W&C investigation and workstreams (0.3); email with J. Walz re: D&O chart (0.1); review chart re: same (0.2); attend call with C. West, A. Chase, and A. Wong re: investigation of claims (0.8); email to C. West re: key documents (0.2); emails with R. Beil and V. Sachdev re: investigation of Debtors' prepetition transactions (0.2).	L Miranda	2.60	3,172.00
6 October 2025	Conduct research (3.7); emails with V. Sachdev re: same (0.2).	G Zahiremami	3.90	3,861.00
7 October 2025	Review litigation assessment matters internal conference call (0.7); review confidential litigation assessment (1.3); review A. Zatz correspondence re: same (0.2); conference call with C. Hansen re: first lien group case status (0.5).	S Greissman	2.70	6,750.00
7 October 2025	Conferences re: investigation.	G Pesce	0.80	1,680.00
7 October 2025	Internal call re: litigation and claims analysis (0.6); reviewing memo (0.7); and related e-mail (0.4); call with AJ Ericksen re: unsecured notes (0.1); and correspondence re: allocating challenge tasks (0.3).	A Zatz	2.10	4,410.00
7 October 2025	Review adversary proceedings.	C Koster	0.40	760.00
7 October 2025	Call with Alix re: potential claims (0.5); follow up internal discussion re: same (0.4); fact and legal research re: claims (2.3).	C West	3.20	5,728.00
7 October 2025	Conference call with A. Zatz, V. Sachdev, E. Smith, R. Beil, D. Litz, G. Silnicki, P. Rai, and S Greissman re: status of confidential litigation assessment.	A Bagdasarian	0.50	790.00
7 October 2025	Call among W&C and Alix re: investigation (0.5); confer with L. Miranda re: investigation (0.8); discuss investigation with L. Miranda and C. West (0.4); begin drafting standing complaint (4.1); review documents re: same (3.7); review ModivCare press releases re: investigation (1.6); finalize interrogatories to Debtors re: investigation (0.7); call among W&C and Alix re: investigation (0.6).	A Chase	12.40	19,592.00
7 October 2025	Discussion re: litigation assessment matters (0.5); correspondence re: unencumbered assets (0.2).	G Silnicki	0.70	1,029.00
7 October 2025	Correspond with Beil and Zatz re: revised confidential litigation assessment memo (0.1); attend confidential litigation assessment call (0.6); review Zatz' email questions re: confidential litigation assessment (0.1).	V Sachdev	0.80	1,136.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 October 2025	Emails with B. Kakani and J. Walz re: D&O liability issue (0.5); review findings from B. Kakani and J. Walz re: directors and officers (0.9); review hot documents flagged by document review team for standing motion and complaint (1.5); draft standing complaint rider re: directors and officers (1.8); call with C. West, A. Chase, L. Miranda, and Alix Partners re: investigation (0.5); emails with C. West, A. Chase, and L. Miranda re: litigation issues (0.2).	A Hong	5.40	7,398.00
7 October 2025	Call with W&C team re: workstreams (0.5); confer with L. Miranda and A. Chase re: standing motion (0.3); review precedent standing motion to draft standing motion (1.2); draft standing motion (3.1).	D Litz	5.10	6,987.00
7 October 2025	Confer with W&C team re: investigation of potential claims (0.3); assist with investigation of potential claims (1.2).	J Yoo	1.50	2,055.00
7 October 2025	Draft and revise reviewlitigation assessment matters memo re: reviewlitigation assessment matters (1.0); correspondence re: same (0.2); review Mercury JV analysis re: same (0.3); attend W&C Call re: same (0.5); research NYDJ litigation re: investigation (1.0); summarize NYDJ litigation re: same (0.5); research TriMark litigation re: same (1.8); summarize TriMark litigation re: same (0.6).	R Beil	5.90	7,552.00
7 October 2025	Call with W&C and Alix call re: prepetition transactions (0.5); confer with A. Chase re: same (0.8); meet with A. Chase and C. West re: same (0.4); review precedent complaints (0.7); review board materials to prepare for drafting complaint re: prepetition transactions (1.2); draft fact section of complaint (1.8); review findings from D. Mago re: research on Indenture language (0.4); email with D. Mago re: same (0.2); review indenture for unsecured notes and 2L notes (0.7); call with D. Mago re: same (0.2); email to A. Chase re: same (0.2); review documents flagged by J. Bourgault (0.4); email with J. Bourgault re: same (0.1); review holders list re: investigation (0.6); review exchange agreement re: same (0.2); prepare materials for Alix re: investigation (0.3); review binder of board materials for C. West and A. Chase (0.2).	L Miranda	8.90	10,858.00
7 October 2025	Attend call with W&C re: review litigation assessment matters.	P Rai	0.50	555.00
7 October 2025	Review amended notes indenture and indenture (0.6); legal research re: precedent debt indentures (1.0); correspondence with L. Miranda re: same (0.1).	D Mago	1.70	1,683.00
7 October 2025	Conduct research (1.7); emails with V. Sachdev and W&C team re: same (0.1).	G Zahiremami	1.80	1,782.00
7 October 2025	Research on ModivCare's D&O liability.	B Kakani	3.20	2,784.00
8 October 2025	Internal analysis conference call (0.8); review confidential litigation assessment memorandum and	S Greissman	1.60	4,000.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	related materials (0.8).			
8 October 2025	Conferences re: investigation.	G Pesce	0.80	1,680.00
8 October 2025	Reviewing timeline summary (1.1); reviewing summary (0.5); and call with C. West re: investigation (0.2).	A Zatz	1.80	3,780.00
8 October 2025	Internal call re: investigation of claims (0.2); call with Alix re: same (0.5); review material/research re: claims and valuation issues (1.1).	C West	1.80	3,222.00
8 October 2025	Call with C. West, L. Miranda, D. Litz and A. Hong re: investigation of claims (0.2); call with W&C and Alix re: investigation of claims (0.5); begin reviewing board materials from 2024 re: investigation (5.8); review research re: insurance re: investigation (0.4); continue drafting complaint (3.1); email among W&C re: investigation (0.2); calls with L. Miranda and J. Bourgault re: same (0.6).	A Chase	10.80	17,064.00
8 October 2025	Review of loan documents and consultation for FRI team re: queries re: credit agreement lenders and collateral.	G Silnicki	1.30	1,911.00
8 October 2025	Call with Alix team and W&C team re: strategy (0.5); review and comment on email status update for A. Zatz (0.1) and correspond with A. Chase, D. Litz, A. Hong, G. Zahiremami, and L. Miranda re: same (0.2); preparation for associate call (0.3); call with D. Litz, R. Beil, G. Zahiremami, and D. Mago complaint and various workstreams (0.5); call with D. Litz, R. Beil, and M. Gates (Alix Partners) re: lien questions from A. Zatz (0.5); review correspondence with R. Beil, D. Litz, P. Rai, and G. Silnicki re: same (0.2); review prior research on potential litigation issue (0.3) and distribute same to W&C team (0.1).	V Sachdev	2.70	3,834.00
8 October 2025	Emails with B. Kakani re: research on D&O issues (0.4); review findings from B. Kakani re: D&O issues (0.8); emails with A. Chase and J. Walz re: director and officer defendants (0.5); review rider re: director and officer defendants (0.3); call with C. West, A. Chase, D. Litz, and L. Miranda re: investigation of claims (0.2); call with W&C and Alix teams re: investigation of claims (0.5); emails with A. Chase, D. Litz, V. Sachdev, R. Beil, and W&C challenge teams re: challenge workstreams (0.4); meet with B. Kakani re: research for potential claim (0.2); emails with C. West, A. Chase, and L. Miranda re: standing complaint (0.7); draft rider for standing complaint re: potential estate claims (2.9).	A Hong	6.90	9,453.00
8 October 2025	Call with Alix team and W&C team re: unencumbered asset analysis and challenge (0.5); call with W&C associate team (0.5); call with W&C team re: standing motion (0.5); call with W&C team and Alix team re: analysis and challenge strategy (0.5); revise standing motion (4.1).	D Litz	6.10	8,357.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
8 October 2025	Confer with W&C team re: investigation into potential claims (0.4); assist with investigation into potential claims (1.3).	J Yoo	1.70	2,329.00
8 October 2025	Conduct Bankruptcy code research re: lien investigation and confidential litigation assessment (1.0); attend confidential litigation assessment call with Alix re: same (0.5); attend call with W&C associates re: same (0.5); research Medicare and Medicaid account perfection possibilities re: same (0.7); analyze and summarize decision and subsequent events re: investigation (1.0); analyze and summarize proceedings re: same (1.7); analyze and summarize Mitel bankruptcy proceedings re: same (0.6); analyze and summarize state court proceedings re: same (1.0); analyze and summarize bankruptcy proceedings re: same (1.9); attend analysis call re: same (0.4).	R Beil	9.30	11,904.00
8 October 2025	Review document production from Debtors (1.2); email with W&C re: same (0.2); emails with litigation support team re: same (0.3); email with J. Walz and B. Kakani re: document review and Board materials summary (0.2); review summary by J. Walz and B. Kakani re: same (0.2); draft complaint for certain prepetition transactions (1.6); review background documents, board materials, and debt documents (4.3); call with A. Chase, C. West, and D. Litz re: complaint (0.2); call with W&C and Alix re: same (0.5); email with E. Smith re: Debtors' response on document production (0.1); draft summary of Company's historical debt (0.6); review financial statements re: same (0.4); Meet and confer with PH (0.3); meet and confer with LW (0.1); draft notes from meet and confer for W&C (0.2).	L Miranda	10.40	12,688.00
8 October 2025	Review and analyze encumbered collateral and excluded assets.	P Rai	0.40	444.00
8 October 2025	Meeting with V. Sachdev, D. Litz and W&C team re: adversary proceeding strategy call (0.5); begin drafting complaint s (1.2); review hearing audio for October 3 hearing re: challenge period (0.2); review email correspondence with W&C team and AlixPartners (0.1).	D Mago	2.00	1,980.00
8 October 2025	Call with W&C team (0.4); conduct research re: same (1.8).	G Zahiremami	2.20	2,178.00
8 October 2025	Draft "Parties" section of complaint.	J Bourgault	0.60	522.00
8 October 2025	Research ModivCare’s D&O liability.	B Kakani	3.20	2,784.00
8 October 2025	Draft section of standing motion.	J Walz	1.80	1,566.00
9 October 2025	Review fact analysis.	S Greissman	1.20	3,000.00
9 October 2025	Conferences re: investigation.	G Pesce	0.80	1,680.00
9 October 2025	Sending questions re: lien review (0.2); reviewing	A Zatz	2.00	4,200.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	timeline summary (1.8).			
9 October 2025	Research/review materials re: valuation issues.	C West	0.90	1,611.00
9 October 2025	Review and revise summary timeline for S. Greissman (1.5); review research from J. Walz and J. Bourgault re: transaction (1.4); review documents re: investigation of litigation issues (3.2); continue drafting complaint (2.2).	A Chase	8.30	13,114.00
9 October 2025	Call with Alix, R. Beil, D. Mago and D. Litz re: confidential litigation assessment and related research (0.4); call with R. Bennett and R. Beil re: healthcare collateral questions (0.5) and correspond with R. Bennett and R. Beil re: same (0.1); correspond with L. Feld re: status of research (0.2); draft and distribute responses to A. Zatz on litigation and claims assessment matters (1.2) and confer with R. Beil re: same (0.2).	V Sachdev	2.60	3,692.00
9 October 2025	Review research re: potential litigation claims (1.7); draft standing complaint rider re: claims against directors and officers (1.9).	A Hong	3.60	4,932.00
9 October 2025	Revise legal analysis for proposed arguments.	D Litz	6.00	8,220.00
9 October 2025	Confer with W&C team re: investigation of potential claims (0.2); assist with investigation of potential claims (1.8).	J Yoo	2.00	2,740.00
9 October 2025	Research Bankruptcy code(a) application to challenges re: confidential litigation assessment (1.0); analyze Credit Agreement re: same (1.2); analyze 2L Indenture re: same (0.5); draft and revise Standing Motion re: same (2.3); attend call with Alix Partners re: same (0.4); attend call with R. Bennett re: same (0.4); research Medicare and Medicare perfection possibilities re: same (1.3); draft responsive chart to A. Zatz queries on confidential litigation assessment re: same (0.3).	R Beil	7.40	9,472.00
9 October 2025	Call with Alix re: investigation of claims (0.2); continue to draft complaint for prepetition transactions (1.1); review documents and background materials re: same (0.9); draft condensed timeline of prepetition transactions for S. Greissman (0.7); run searches in relativity for documents (0.6).	L Miranda	3.50	4,270.00
9 October 2025	Review precedent complaints re: potential litigation actions (2.2); review confidential litigation assessment memo (0.4); review draft standing motion (0.6); analyze DIP Financing Order (0.3); draft proposed complaint (3.5).	D Mago	7.00	6,930.00
9 October 2025	Conduct research (4.6); email same to R. Beil and V. Sachdev (0.1); emails to D. Litz re: same (0.2).	G Zahiremami	4.90	4,851.00
9 October 2025	Research ModivCare's D&O liability.	B Kakani	5.60	4,872.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 October 2025	Conference call with Quinn team re: investigation (0.5); follow up conference call with C. Shore and litigation team re: same (0.5); review fact analysis (1.6).	S Greissman	2.60	6,500.00
10 October 2025	Conferences re: investigation.	G Pesce	0.80	1,680.00
10 October 2025	Call with Quinn re: independent investigation (0.3); reviewing responses to lien review questions (0.3).	A Zatz	0.60	1,260.00
10 October 2025	Call among W&C and Quinn re: investigation (0.3); review documents re: investigation (4.8); call among W&C and Alix re: same (0.3).	A Chase	5.40	8,532.00
10 October 2025	Confer with Beil and Litz re: marshalling arguments (0.2); call with E. Feld re: same (0.3); review DIP Financing order for same (0.1); correspond with Feld re: same (0.1); review Beil research re: healthcare receivables (0.2); correspond with Beil, Feld, Bennett, Zahiremami and Mago re: same (0.3); call with E. Feld re: same (0.1).	V Sachdev	1.30	1,846.00
10 October 2025	Review research from B. Kakani re: potential litigation claim (0.9); emails with B. Kakani re: same (0.5); review documents flagged by document review team for standing complaint (0.9); draft standing complaint section re: potential litigation claim (1.1); emails with C. West, A. Chase, D. Litz, J. Yoo, and L. Miranda re: standing motion and complaint (0.2).	A Hong	3.60	4,932.00
10 October 2025	Revise legal arguments of standing motion (1.0); call with W&C team and Quinn team re: investigation (0.3).	D Litz	1.30	1,781.00
10 October 2025	Research and summarize Medicare/Medicaid statutes re: potential argument (1.2); research and summarize case law re: validity of security interests for potential arguments (3.7); research and summarize Article 9 security interests for potential arguments (0.8); research and summarize analysis of potential arguments (0.6); Analyze DIP Financing Order re: DIP Financing Order effect on litigation and claims analysis (0.3); correspondence with D. Mago and V. Sachdev re: same (0.2).	R Beil	6.80	8,704.00
10 October 2025	Review materials in response to A. Chase's questions (0.3); call with Alix and W&C re: prepetition transactions (0.2); email with Alix re: same (0.1); call with Quinn and W&C re: investigation of transactions (0.3); call with W&C re: document review (0.3); review documents re: prepetition transactions, including board materials (1.8); continue to draft complaint re: prepetition transactions (2.4).	L Miranda	5.40	6,588.00
10 October 2025	Analyze final DIP Financing order re: DIP Financing liens (0.2); draft email to R. Beil re: same (0.1); call with R. Beil re: DIP Financing order (0.1); draft complaint re: background (0.9).	D Mago	1.30	1,287.00
10 October 2025	Research potential causes of action against Debtors (1.3); review document production received from	B Kakani	2.50	2,175.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Debtors (1.2).			
11 October 2025	Review fact analysis.	S Greissman	0.90	2,250.00
11 October 2025	Review document production from Debtors (0.9); emails with W&C and Alix re: same (0.2); review documents and background materials for complaint drafting (2.3); draft complaint re: prepetition transactions (1.1).	L Miranda	4.50	5,490.00
12 October 2025	Continue drafting standing complaint (5.0); review documents re: same (3.7).	A Chase	8.70	13,746.00
12 October 2025	Draft complaint re: background section re: prepetition capital structure.	D Mago	1.40	1,386.00
12 October 2025	Draft "Parties" section of Complaint.	J Bourgault	6.70	5,829.00
13 October 2025	Conference call with Alix re: litigation analysis (0.6); review fact analysis (0.8).	S Greissman	1.40	3,500.00
13 October 2025	Review correspondence and materials re: causes of action and case strategy re: same.	G Pesce	0.80	1,680.00
13 October 2025	Call with Alix re: litigation issues.	A Zatz	0.30	630.00
13 October 2025	Call with Alix re: valuation (0.3); fact research re: valuation (1.1).	C West	1.40	2,506.00
13 October 2025	Call among W&C and Alix re: investigation (0.3); review SEC filings and board documents re: valuation (3.2); confer with L. Miranda re: same (0.2); continue drafting complaint (3.9).	A Chase	7.60	12,008.00
13 October 2025	Call with W&C and Alix teams re: analysis (0.3); review diligence timeline and hot documents flagged by document review team (0.5); factual research re: claims against directors and officers (1.6).	A Hong	2.40	3,288.00
13 October 2025	Edit legal arguments of standing motion (2.8); W&C and Alix team meeting re: valuation (0.5).	D Litz	3.30	4,521.00
13 October 2025	Review J. Bourgault research re: Second Lien Holders (0.5); email with J. Bourgault re: same (0.1); call with Alix re: prepetition transactions (0.3); review documents in Debtors' new document production (0.9); email with W&C re: same (0.2); review board materials, emails, and public filings re: prepetition transactions (2.4); analyze documents re: same for complaint (1.6); draft complaint re: prepetition transactions (3.2); email with E. Smith re: document production for investigation (0.2); email with J. Walz re: Company's holders (0.1); review J. Walz summary re: same (0.2).	L Miranda	9.70	11,834.00
13 October 2025	Analyze final order approving debtor in possession financing (0.3); analyze memorandum re: 1L and 2L	D Mago	5.60	5,544.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	collateral packages (0.2); analyze Credit Agreement re: defined terms and miscellaneous provisions (0.2); analyze indenture re: defined terms and miscellaneous provisions (0.2); revise complaint re: background section (3.2); revise complaint re: counts (1.5).			
13 October 2025	Email to E. Feld re: potential litigation issue research (0.2); conduct research re: same (2.2).	G Zahiremami	2.40	2,376.00
13 October 2025	Research trustee and 2L lien holder issues (6.1); Draft "Parties" section of complaint (1.1).	J Bourgault	7.20	6,264.00
14 October 2025	Review correspondence and materials re: causes of action and case strategy re: same.	G Pesce	0.80	1,680.00
14 October 2025	Review debt documents re: investigation.	A Chase	6.30	9,954.00
14 October 2025	Correspond with W&C team re: contract review.	V Sachdev	0.20	284.00
14 October 2025	Review board materials re: litigation issues (2.8); factual research re: potential claims against directors and officers (3.6).	A Hong	6.40	8,768.00
14 October 2025	Standing motion legal research.	D Litz	0.50	685.00
14 October 2025	Review documents in support of investigation into insider payments.	J Yoo	2.20	3,014.00
14 October 2025	Research universe of lawsuits involving Debtors as Plaintiffs re: research.	R Beil	4.30	5,504.00
14 October 2025	Call with Alix and W&C re: prepetition transactions (0.5); review documents re: prepetition transactions, including Board materials, public filings, and documents produced by Debtors (2.6); run targeted searches in Relativity and review documents re: prepetition transactions (2.1); continue to draft complaint on prepetition transactions (4.2).	L Miranda	9.40	11,468.00
14 October 2025	Complete revisions to complaint (1.0); email with V. Sachdev and D. Litz re: same (0.1).	D Mago	1.10	1,089.00
14 October 2025	Conduct research (2.4); confer with V. Sachdev re: same (0.2).	G Zahiremami	2.60	2,574.00
15 October 2025	Review correspondence and materials re: causes of action and case strategy re: same.	G Pesce	0.80	1,680.00
15 October 2025	Review materials re: claims investigation.	C West	0.70	1,253.00
15 October 2025	Call with L. Miranda and Alix Partners re: investigation (0.2); revise fact section of draft complaint (2.8).	A Chase	3.00	4,740.00
15 October 2025	Develop potential litigation issue argument including research for same (4.4); confer with G. Zahiremami re: same (0.2); call with E. Feld re: same (0.3); confer with	V Sachdev	5.90	8,378.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	A. Zatz re: same (0.1); call with A. Panda (Alix), D. Litz, G. Zahiremami and R. Beil re: same (0.5); call with M. Gates (Alix), R. Beil, and D. Litz re: unencumbered asset review (0.4).			
15 October 2025	Review hot documents flagged by document review team (1.0); emails with C. West, A. Chase, and L. Miranda re: standing complaint (0.3); research re: potential estate claims (1.5).	A Hong	2.80	3,836.00
15 October 2025	Meeting with Alix & W&C teams re: confidential litigation assessment (0.3); call with W&C and Alix teams re: operations (0.4); revise draft motion (2.9).	D Litz	3.60	4,932.00
15 October 2025	Review documents in support of investigation into insider payments (0.9); confer with W&C team re: same (0.3).	J Yoo	1.20	1,644.00
15 October 2025	Attend call with Alix re: confidential litigation assessment (0.4); Attend call with Alix on company operations re: potential litigation issue analysis (0.4); review contracts uploaded to data room re: same (1.5); analyze first contract re: same (1.2); analyze second contract re: same (1.8); analyze third contract re: same (1.0); summarize relevant contract provisions re: same (0.3).	R Beil	6.60	8,448.00
15 October 2025	Emails with Alix re: prepetition transactions (0.4); call with Alix re: same (0.2); call with W&C re: document review of investigation into prepetition transactions (0.2); review diligence re: investigation into prepetition transactions (1.7); email with W&C re: hot documents (0.2); draft complaint re: prepetition transactions (3.1); confer with A. Chase re: same (0.2); review documents for S. Greissman re: prepetition transactions (0.4).	L Miranda	6.40	7,808.00
15 October 2025	Review of deposit account control agreements and value of accounts.	P Rai	0.80	888.00
15 October 2025	Call with V. Sachdev re: standing motion (0.1); further confer with same re: same (0.1); conduct research re: potential litigation issue (2.8); attend call with W&C and AlixPartners re: same (0.5).	G Zahiremami	3.50	3,465.00
16 October 2025	Review correspondence and materials re: causes of action and case strategy re: same.	G Pesce	0.80	1,680.00
16 October 2025	Reviewing litigation issues analysis.	A Zatz	0.20	420.00
16 October 2025	Review and revise draft summary of key facts for potential causes of action.	A Chase	1.40	2,212.00
16 October 2025	Review DACA analysis (0.2) and correspond with R. Beil re: same (0.1); call with R. Beil re: same and open confidential litigation assessment tasks (0.2); review updated responses to A. Zatz's questions (0.3); correspond with R. Beil re: same (0.1); continue developing potential litigation issue analysis (0.2).	V Sachdev	1.10	1,562.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 October 2025	Review hot documents flagged by document review team (0.9); review notes from interviews with S. Kern and K. Shepard (0.6); research re: claims against director and officers (2.8).	A Hong	4.30	5,891.00
16 October 2025	Analyze unencumbered assets re: confidential litigation assessment (0.3); internal correspondence with debt finance and restructuring teams on unencumbered assets re: same (0.2); conduct research re: Medicare/Medicaid receivables re: potential litigation issue analysis (1.8); analyze Medicare/Medicaid manual re: same (1.4); analyze workstreams status (0.6); draft and revise workstreams chart re: same (0.8); call with V. Sachdev re: same (0.1).	R Beil	5.20	6,656.00
16 October 2025	Emails with R. Beil re: diligence (0.2); conduct targeted searches in relativity re: same (0.3); continue to draft complaint into potential prepetition claims and causes of action (1.4); review diligence re: same (0.8).	L Miranda	2.70	3,294.00
16 October 2025	Conduct research (2.3); conduct research re: diminution in value (1.2); confer with W&C team re: same (0.2); attend call with W&C and FA teams re: asset analysis (0.5).	G Zahiremami	6.10	6,039.00
17 October 2025	Review materials re: causes of action and case strategy re: same.	G Pesce	1.80	3,780.00
17 October 2025	Call with E. Smith and L. Miranda re: investigation workstreams (0.3); review and revise draft slides re: investigation (1.4).	A Chase	1.70	2,686.00
17 October 2025	Factual research re: claims against directors and officers.	A Hong	2.00	2,740.00
17 October 2025	Confer with W&C team re: investigation of insider payments.	J Yoo	0.10	137.00
17 October 2025	Research re: Medicare/Medicaid receivables re: confidential litigation assessment.	R Beil	1.30	1,664.00
17 October 2025	Call with A. Chase and E. Smith re: litigation workstreams on investigation (0.3); email with C. Chitwan re: prepetition transactions diligence (0.2); review and revise deck re: investigation of claims and causes of action (0.9); email with D. Litz re: debt holders (0.1); review list of debt holders (0.4); emails with J. Bourgault re: same (0.2).	L Miranda	2.10	2,562.00
17 October 2025	Conduct research (3.6); review settlement slides re: same (0.2); email to team re: same (0.1).	G Zahiremami	3.90	3,861.00
18 October 2025	Conduct document review.	J Bourgault	1.30	1,131.00
19 October 2025	Continue to draft sections of complaint re: prepetition transactions (1.4); review diligence re: same (0.6); confer with A. Chase re: complaint on prepetition	L Miranda	2.40	2,928.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	transactions (0.4).			
20 October 2025	Review materials re: causes of action.	G Pesce	0.80	1,680.00
20 October 2025	Research re: standing motion and potential claims.	C West	1.00	1,790.00
20 October 2025	Correspond with R. Beil re: research (0.1); confer with G. Zahiremami re: research (0.1).	V Sachdev	0.20	284.00
20 October 2025	Review hot documents flagged by document review team (0.9); research re: potential estate claim (0.6); call with A. Chase, L. Miranda, and review team re: document review (0.2).	A Hong	1.70	2,329.00
20 October 2025	Research re: Medicare/Medicaid receivables re: confidential litigation assessment (1.2); research commingling re: same (1.5); summarize outstanding V. Sachdev Medicare/Medicaid research questions re: same (1.1); Research potential litigation issue examples re: standing motion (1.8).	R Beil	5.60	7,168.00
20 October 2025	Draft complaint on prepetition claims and causes of action (3.6); review documents re: same (2.4); review updated timeline of Board materials (1.4); email with A. Aquije re: same (0.1); review J. Bourgault's summary on lenders (0.2); email with Alix re: prepetition transactions (0.2); email with C. Chitwan re: term sheets for prepetition transactions (0.1).	L Miranda	8.00	9,760.00
20 October 2025	Legal research re: case re: potential litigation issue (0.4); legal research re: case law re: potential litigation issue (2.7); begin drafting memo re: same (0.4).	D Mago	3.50	3,465.00
20 October 2025	Conduct research re: settlement and potential litigation issue (4.6); prepare write up re: same (1.8); email same to A. Zatz and V. Sachdev (0.1); conduct research re: diminution (0.8); confer with R. Beil re: same (0.2); email findings re: standards for potential state claims to L. Miranda (0.1).	G Zahiremami	7.60	7,524.00
21 October 2025	Review materials re: causes of action.	G Pesce	0.80	1,680.00
21 October 2025	Research re: potential claims.	C West	0.90	1,611.00
21 October 2025	Call among W&C re: investigation update (0.5); review documents to prepare for call (0.7).	A Chase	1.20	1,896.00
21 October 2025	Discussion re: account pledges and unencumbered assets (0.4); related review of loan documents and research (0.4).	G Silnicki	0.80	1,176.00
21 October 2025	Review R. Beil research re: healthcare receivables (0.9) and draft email with follow-up questions re: same (0.2); confer with G. Zahiremami re: potential litigation issue research (0.1); review memo flagged by A. Zatz (0.2).	V Sachdev	1.40	1,988.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
21 October 2025	Factual research re: potential estate claim for complaint.	A Hong	2.10	2,877.00
21 October 2025	Revise draft standing motion for complaint.	D Litz	3.00	4,110.00
21 October 2025	Draft and revise standing motion preliminary statement re: litigation analysis (1.5); draft and revise standing motion background re: same (2.4); analyze first day declaration re: same (0.4); analyze 1L & 2L credit documents re: same (1.2); attend call with G. Silnicki re: same (0.3); Attend W&C call re: confidential litigation assessment workstreams (0.5).	R Beil	6.30	8,064.00
21 October 2025	Call with W&C re: workstreams (0.5); confer with A. Chase re: same (0.2); draft complaint re: prepetition transactions (1.8); review diligence re: same (1.4); review First Lien Lenders' responses and objections to document review (0.2); email with litigation support team re: document productions (0.2); email with E. Smith re: Debtors document production (0.2); update lender list for prepetition transactions investigation (0.7); email with A. Zatz re: same (0.2); attend and take notes on call with Alix, Moelis, FTI and Latham re: diligence (3.0).	L Miranda	8.40	10,248.00
21 October 2025	Legal research re: potential litigation issue (1.5); draft memo to V. Sachdev and D. Litz re: same (0.9).	D Mago	2.40	2,376.00
21 October 2025	Conduct research re: potential litigation issue (4.8); confer with V. Sachdev re: same (0.1); attend call with W&C team re: same (0.3).	G Zahiremami	5.20	5,148.00
22 October 2025	Review materials re: causes of action.	G Pesce	0.80	1,680.00
22 October 2025	Research re: litigation claims and meeting with A. Chase re: same.	C West	0.50	895.00
22 October 2025	Review documents re: investigation.	A Chase	2.30	3,634.00
22 October 2025	Research/consultation re: receivables assets and related internal correspondence.	G Silnicki	1.40	2,058.00
22 October 2025	Correspond with R. Beil re: receivables research (0.2) and review revisions to same (0.1); review potential litigation issue research and memos (0.7).	V Sachdev	1.00	1,420.00
22 October 2025	Factual research re: potential estate claim (1.7); confer with A. Chase re: complaint (0.1); call with A. Chase, L. Miranda, and document review team re: document review (0.3).	A Hong	2.10	2,877.00
22 October 2025	Research re litigation and claims analysis (1.5); research Medicare/Medicaid receivables designation under Article 9 re: same (1.4); research re: cash re: same (1.2); research re: proceeds of Medicare/Medicaid receivables re: same (2.3); summarize follow-up research re: Medicare/Medicaid receivables and cash re: same (0.9).	R Beil	7.30	9,344.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 October 2025	Continue drafting complaint into prepetition transactions.	L Miranda	2.90	3,538.00
22 October 2025	Review and revise chart re: potential litigation issue research.	G Zahiremami	1.20	1,188.00
23 October 2025	Review relief stay motions.	S Greissman	0.50	1,250.00
23 October 2025	Research re: litigation claims.	C West	0.70	1,253.00
23 October 2025	Review documents re: investigating claims (3.6); email among W&C re: same (0.6).	A Chase	4.20	6,636.00
23 October 2025	Review, analyze and comment on revised write-up from R. Beil (0.4); review and analyze research (1.1); confer with A. Zatz re: claims analysis (0.2); develop arguments re: same (0.4); call with R. Komendowski (Alix) re: same (0.4); call with A. Zatz re: related research (0.4); call with G. Zahiremami re: same (0.1).	V Sachdev	3.00	4,260.00
23 October 2025	Factual research re: approval and negotiation of transaction.	A Hong	2.60	3,562.00
23 October 2025	Revise draft standing motion for complaint and legal research re: same.	D Litz	2.70	3,699.00
23 October 2025	Research re: cash proceeds under Article 9 (1.0); research re: grace period re: Article 9 re: same (0.5); research re: Medicare/Medicaid receivables under Article 9 re: same (1.0); analyze cash management motion and trace flow of funds through controlled accounts re: same (1.0); call with V. Sachdev on Medicare/Medicaid receivables research re: same (0.2).	R Beil	3.70	4,736.00
23 October 2025	Continue to revise draft complaint re: prepetition transactions.	L Miranda	2.30	2,806.00
23 October 2025	Conduct research re: standards for potential state claims (0.8); email to D. Litz re: same (0.1).	G Zahiremami	0.90	891.00
24 October 2025	Review materials for internal litigation call (0.3); internal call re: litigation (0.7).	C West	1.00	1,790.00
24 October 2025	Correspond with R. Komendowski (Alix) re: collateral challenge (0.2); correspond with E. Smith re: same (0.1); call with R. Komendowski (Alix) re: collateral challenge (0.4); call with G. Zahiremami re: same (0.1); review and summarize research for Alix (1.8); review, analyze and further comment on revised write-up from R. Beil (1.1) and correspond with R. Beil re: same (0.1).	V Sachdev	3.80	5,396.00
24 October 2025	Factual research re: negotiation and approval of transaction (0.9); call with A. Chase, L. Miranda, and document review team re: incoming document review (0.2).	A Hong	1.10	1,507.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
24 October 2025	Revise fact and argument section for potential standing motion.	D Litz	4.50	6,165.00
24 October 2025	Analyze concentration account DACAs (1.6); analyze cash management schematic re: same (0.6); research permissibility of Debtors actions postpetition re: same (1.8); draft and revise research summary re: Medicare/Medicaid receivables and proceeds re: same (0.3).	R Beil	4.30	5,504.00
24 October 2025	Conduct research re: diminution in collateral value (4.3); prepare write up re: same (2.4); email same to W&C team (0.1); revise and revise potential litigation issue caselaw chart (1.8); email same to V. Sachdev (0.1); call with same re: same (0.1).	G Zahiremami	8.80	8,712.00
25 October 2025	Review investigation documents from J. Waltz.	A Chase	3.10	4,898.00
25 October 2025	Review final receivable analysis from R. Beil (0.2) and correspond with R. Beil re: same (0.1).	V Sachdev	0.30	426.00
25 October 2025	Review and revise complaint re: prepetition transactions (0.7); email with A. Chase re: same (0.2); review hot documents tracker (0.2); email with J. Bourgault re: same (0.1); email with A. Chase and A. Hong re: hot document (0.2).	L Miranda	1.40	1,708.00
26 October 2025	Review and revise draft rider for complaint from L. Miranda.	A Chase	7.90	12,482.00
27 October 2025	Review materials re: causes of action.	G Pesce	1.60	3,360.00
27 October 2025	Reviewing diminution research (0.3) and related correspondence (0.2).	A Zatz	0.50	1,050.00
27 October 2025	Review materials re: claims investigation.	C West	0.80	1,432.00
27 October 2025	Revise draft standing complaint (8.8); draft prayer for relief (0.7).	A Chase	9.50	15,010.00
27 October 2025	Call with R. Beil re: open workstreams and status (0.2); call with Zahiremami re: open workstreams and research (0.2); review G. Zahiremami research on adequate protection (0.4) and correspond with S. Greissman, A. Zatz, and G. Zahiremami re: same (0.6).	V Sachdev	1.40	1,988.00
27 October 2025	Emails with J. Yoo and L. Miranda re: litigation workstreams (0.4); review hot documents flagged by document review team (1.5); factual research re: earnings reports (0.9); emails with A. Chase and L. Miranda re: D&O defendants (0.1); draft standing complaint section re: director and officer claims (2.7).	A Hong	5.60	7,672.00
27 October 2025	Revise legal arguments re: potential causes of action for standing motion.	D Litz	3.10	4,247.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 October 2025	Analyze ongoing W&C + Alix workstreams and summarize status re: confidential litigation assessment (1.0); Analyze contracts for payment and renewal mechanics (2.5); analyze contracts for billing and per diem provisions re: same (3.0); call with V. Sachdev on status of contract review re: same (0.1).	R Beil	6.60	8,448.00
27 October 2025	Call with V. Sachdev re: potential litigation issue.	G Zahiremami	0.20	198.00
28 October 2025	Review materials re: causes of action.	G Pesce	0.80	1,680.00
28 October 2025	Accounts receivable research (0.3); related correspondence (0.2).	A Zatz	0.50	1,050.00
28 October 2025	Review draft complaint.	C West	0.70	1,253.00
28 October 2025	Review updated document review summary (0.7); revise draft complaint (6.4).	A Chase	7.10	11,218.00
28 October 2025	Develop arguments for including research related thereto (2.6); review G. Zahiremami's research on settlement proceeds and related cases (1.2); correspond with L. Feld, A. Zatz, R. Beil and G. Silnicki re: Medicare receivables (0.2).	V Sachdev	4.00	5,680.00
28 October 2025	Emails with A. Chase and L. Miranda re: claims against directors and officers (0.5); factual research re: litigation issues (3.5); draft rider for complaint re: corporate law claims (3.0); review hot documents flagged by document review team (1.6).	A Hong	8.60	11,782.00
28 October 2025	Revise standing motion.	D Litz	0.70	959.00
28 October 2025	Analyze contracts and summarize payment mechanics and adjustment mechanics (3.5); analyze further contracts and summarize payment mechanics and adjustment mechanics re: same (3.0); analyze additional contracts and summarize payment mechanics and adjustment mechanics re: same (1.5); synthesize analysis re: all contract groups with potential litigation issue re: same (0.5).	R Beil	8.50	10,880.00
28 October 2025	Email to A. Chase re: lenders (0.2); review board materials re: same (0.2); review and revise list of deponents re: investigation topics (0.9); email with A. Chase re: same (0.2); email to A. Chase re: documents for draft complaint (0.3); confer with A. Chase re: same (0.2); emails with Alix re: prepetition transactions (0.2).	L Miranda	2.20	2,684.00
28 October 2025	Consolidate caselaw and send same to V. Sachdev (0.3); conduct research re: evidence re: unencumbered assets (2.7); email findings to V. Sachdev (0.1).	G Zahiremami	3.10	3,069.00
29 October 2025	Review materials re: causes of action.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 October 2025	Call with Alix re: claims investigation (0.6); internal call re: same (0.6); research re: claims investigation (0.8).	C West	2.00	3,580.00
29 October 2025	Call with J. Yoo and C. West re: investigation (0.6); call with L. Miranda, C. West, Alix team re: investigation (0.6).	A Chase	1.20	1,896.00
29 October 2025	Call with G. Zahiremami re: lien review research (0.2); correspond with M. Gates (Alix) re: same (0.1); review and comment on standing motion (1.6); research re: same (0.6).	V Sachdev	2.50	3,550.00
29 October 2025	Emails with A. Chase and L. Miranda re: claims against directors and officers (0.3); factual research re: litigation issues (2.0); draft rider for complaint re: corporate law claims (1.5); document review call with E. Smith, L. Miranda, and document review team (0.4); review hot documents flagged by document review team (1.0).	A Hong	5.20	7,124.00
29 October 2025	Attend call with A. Chase and C. West re: investigation (0.6); review documents in support of investigation (0.8); confer with J. Bourgault re: research in support of investigation (0.5).	J Yoo	1.90	2,603.00
29 October 2025	Draft and revise standing motion (3.2); research potential litigation issue case law re: same (1.0); research potential litigation issue case law re: same (1.2); analyze contract payment and renewal mechanics re: same (1.3); research complaint precedent re: same (1.0).	R Beil	7.70	9,856.00
29 October 2025	Review draft complaint of prepetition transactions (0.9); call with Alix re: same (0.5); call with C. West and A. Chase re: same (0.3).	L Miranda	1.70	2,074.00
29 October 2025	Review documents cited in draft complaint (3.6); emails with L. Miranda and C. Isaac re: same (0.4).	C Chitwan	4.00	4,440.00
29 October 2025	Analyze case law sent by G. Zahiremami (4.3); populate case law chart re: same (1.2).	D Mago	5.50	5,445.00
29 October 2025	Review and revise chart (2.8); call with D. Mago re: same (0.3); emails with same re: same (0.1); call with V. Sachdev re: same (0.2).	G Zahiremami	3.40	3,366.00
29 October 2025	Discuss research assignment with J. Yoo (0.4); Research topics in anticipation of complaint (1.1).	J Bourgault	1.50	1,305.00
30 October 2025	Review/edit draft complaint re: causes of action and research re: same.	C West	2.30	4,117.00
30 October 2025	Review, comment on, and draft standing motion on motion (2.3); correspond with R. Beil re: same (0.2); confer with E. Smith re: same (0.1); correspond with Zahiremami re: research (0.1).	V Sachdev	2.70	3,834.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 October 2025	Factual research re: Fifth Amendment negotiations (2.7); draft rider for complaint re: corporate law claims (2.7).	A Hong	5.40	7,398.00
30 October 2025	Draft and revise standing motion background (1.4); analyze ModivCare SEC filings for background re: same (1.0); draft and revise standing motion argument (2.5); analyze V. Sachdev edits to argument sections re: same (0.5); research potential litigation issue cases on postpetition receivables re: same (1.0); research potential litigation issue cases on services industries re: same (1.0).	R Beil	7.40	9,472.00
30 October 2025	Revise complaint to reflect revisions to standing motion.	D Mago	1.80	1,782.00
30 October 2025	Conduct research (2.6); confer with V. Sachdev re: same (0.1).	G Zahiremami	2.70	2,673.00
30 October 2025	Research issues for complaint.	J Bourgault	4.10	3,567.00
31 October 2025	Review/edit complaint and research re: same (1.1); internal calls re: deposition planning (0.6); research/preparation for depositions (0.5); call with Quinn re: investigation (0.3); internal follow-up discussions re: same (0.4); review/edit draft correspondence re: deposition notices to 1Ls and internal communications re: same (0.4).	C West	3.30	5,907.00
31 October 2025	Call with Quinn re: investigation (0.3); call with C. Shore and C. West re: same (0.2).	A Chase	0.50	790.00
31 October 2025	Review updated research from team (0.4); research caselaw (1.2); correspond with R. Beil re: updated motion and complaint (0.1).	V Sachdev	1.70	2,414.00
31 October 2025	Factual research re: directors and officers (1.9); draft corporate law causes of action for standing complaint re: litigation issues (2.4).	A Hong	4.30	5,891.00
31 October 2025	Revise draft standing motion.	D Litz	2.30	3,151.00
31 October 2025	Draft and revise proposed complaint (4.0); draft and revise standing motion re: same (1.0).	R Beil	5.00	6,400.00
31 October 2025	Conduct research re: potential litigation issue (3.8); prepare case summary re: chart (2.3).	G Zahiremami	6.10	6,039.00
31 October 2025	Research issues for complaint (6.5); Review 1L documents (0.6).	J Bourgault	7.10	6,177.00
SUBTOTAL: Investigation of Causes of Action			**755.40**	**1,003,002.00**

Mediation

2 October 2025	Review UHC settlement motion draft.	S Greissman	0.50	1,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 October 2025	Review proposed UHC settlement.	A Chase	0.70	1,106.00
4 October 2025	Client correspondence and conference call re: status/settlement.	S Greissman	0.50	1,250.00
6 October 2025	Internal discussion re: UHC settlement.	S Greissman	0.30	750.00
7 October 2025	Review UHC settlement motion.	S Greissman	0.50	1,250.00
10 October 2025	Conference call with G. Klidonas re: conference and settlement meeting (0.2); conference call with K. Hansen re: conference follow up and settlement meeting (0.2).	S Greissman	0.40	1,000.00
10 October 2025	Emails with W&C and Alix teams re: settlement.	J Shore	1.40	3,500.00
15 October 2025	Settlement meeting preparation call with C. Shore (0.2); follow up call with A. Zatz and J. Zakia re: settlement meeting preparation (0.3); team call re: settlement meeting materials (0.5); review litigation issues and materials (1.5); correspondence with G. Klidonas re: settlement meeting (0.2); correspondence with D. Rowe re: settlement meeting (0.1).	S Greissman	2.80	7,000.00
15 October 2025	Confer with S. Greissman and A. Zatz re: mediation presentation.	J Zakia	0.40	880.00
15 October 2025	Call with S. Greissman, L. Feld, A. Zatz, and D. Mago re: settlement discussion materials (0.5); draft outline of same (0.2); call with D. Litz and D. Mago re: same (0.4).	V Sachdev	1.10	1,562.00
15 October 2025	Meeting re: settlement (0.4); meeting re: deck with V. Sachdev & D. Mago (0.4).	D Litz	0.80	1,096.00
15 October 2025	Call with D. Litz and V. Sachdev re: presentation re: same (0.2); analyze Disclosure Statement re: class treatment (0.3); analyze valuation analysis (0.1); analyze liquidation analysis re: unsecured claims pool (0.2); begin drafting presentation (1.4).	D Mago	2.20	2,178.00
16 October 2025	Correspondence re: settlement materials.	A Zatz	0.30	630.00
16 October 2025	Draft and revise case settlement deck (3.1); correspond with D. Mago and D. Litz re: same (0.2).	V Sachdev	3.30	4,686.00
16 October 2025	Confer with W&C team re: preparing materials for settlement conference (0.7); draft and revise materials for Committee and settlement discussions (4.5).	D Litz	5.20	7,124.00
16 October 2025	Analyze unencumbered assets re: Committee settlement deck (0.7); summarize unencumbered assets of value re: same (0.4).	R Beil	1.10	1,408.00
16 October 2025	Call with A. Chase re: deck for potential settlement (0.2); draft key points for deck re: investigation of	L Miranda	2.80	3,416.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	prepetition claims (2.6).			
16 October 2025	Assist in preparation of presentation by analyzing filings for relevant materials (0.4); correspondence with D. Litz re: upcoming key dates for Committee presentation (0.1); review scheduling motion re: key dates (0.2).	D Mago	0.70	693.00
17 October 2025	Conference call with K. Hansen re: all-hands settlement meeting (0.5); conference call and correspondence with G. Klidonas re: all-hands settlement meeting (0.5); conference call with C. Shore re: all-hands settlement meeting (0.5); W&C team conference call re: settlement meeting materials (0.8); review and revise settlement meeting materials (1.0).	S Greissman	3.30	8,250.00
17 October 2025	Mediation emails.	J Shore	2.30	5,750.00
17 October 2025	Draft and edit settlement materials (2.7); correspond with D. Mago, R. Beil, D. Litz, G. Zahiremami re: same (0.4); correspond with A. Chase re: same (0.1).	V Sachdev	3.20	4,544.00
17 October 2025	Emails with A. Chase, D. Litz, J. Yoo, L. Miranda, V. Sachdev, and D. Mago re: settlement discussion deck (0.3); revise deck re: claims investigation (1.0).	A Hong	1.30	1,781.00
17 October 2025	Revise settlement deck (4.5) and confer with W&C team re: same (0.5).	D Litz	5.00	6,850.00
17 October 2025	Analyze Disclosure Statement, liquidity analysis and valuation analysis re: settlement proposal (0.8); research Article 9 re: same (0.5); draft and revise settlement deck re: same (0.2).	R Beil	1.50	1,920.00
17 October 2025	Assist in preparation of presentation.	D Mago	1.50	1,485.00
18 October 2025	Review settlement materials (2.0); related material conference call (0.5); Alix conference call re: same (0.5).	S Greissman	3.00	7,500.00
18 October 2025	Conferences with W&C and Alix teams re: preparation for settlement meeting.	G Pesce	0.80	1,680.00
18 October 2025	Reviewing settlement deck (0.7); and related internal call and correspondence (0.4).	A Zatz	1.10	2,310.00
18 October 2025	Review A. Zatz's comments to deck (0.2); correspond with D. Litz and D. Mago re: same (0.2); review edits to same (0.1); call with S. Greissman, A. Zatz, L. Feld, D. Litz and D. Mago re: settlement conference deck (0.5); review D. Mago research re: same (0.2) and correspond with D. Mago re: same (0.1).	V Sachdev	1.30	1,846.00
18 October 2025	Revise settlement deck (3.2); confer with W&C team re: same (0.9).	D Litz	4.10	5,617.00
18 October 2025	Confer with D. Litz re: deck on investigation of claims	L Miranda	0.20	244.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	and causes of action.			
18 October 2025	Revise presentation.	D Mago	1.20	1,188.00
19 October 2025	Review settlement materials (2.0); related material conference call (0.5); Alix conference call re: same (0.5).	S Greissman	3.00	7,500.00
19 October 2025	Conferences with W&C and Alix teams re: preparation for settlement meeting.	G Pesce	0.80	1,680.00
19 October 2025	Revising settlement deck (0.4); and related call with Alix (0.3).	A Zatz	0.70	1,470.00
19 October 2025	Revise settlement conference deck (0.4); correspond with D. Mago and D. Litz re: same (0.3); call with A. Zatz, E. Feld, D. Mago, D. Litz and Alix team re: valuation slides (0.2); additional call with S. Greissman, E. Feld, D. Mago, D. Litz and Alix re: same (1.2); debrief with S. Greissman, E. Feld, D. Mago and D. Litz re: same (0.2).	V Sachdev	2.30	3,266.00
19 October 2025	Settlement deck revisions (2.8); meetings with Alix team W&C team re: same (2.0).	D Litz	4.80	6,576.00
19 October 2025	Call with W&C and AlixPartners re: presentation (0.4); revise presentation (0.5); attend meeting with W&C and AlixPartners teams re: presentation (1.1); revise presentation per S. Greissman's comments (0.3).	D Mago	2.30	2,277.00
20 October 2025	Prepare for all hands settlement meeting (1.5); review, revise settlement/Committee materials (4.5); conference call and correspondence with Alix re: valuation and waterfall analysis (1.5); internal correspondence and conference call re: same (1.0).	S Greissman	8.50	21,250.00
20 October 2025	Calls and emails re: mediation.	J Shore	2.00	5,000.00
20 October 2025	Review settlement meeting presentation (0.6); confer with C. Shore re: same (1.0); prepare for settlement meeting (0.7).	J Zakia	2.30	5,060.00
20 October 2025	Reviewing L. Feld comments to settlement deck and related e-mail (0.4); revising settlement deck (0.7); and related calls with Alix (1.4).	A Zatz	2.50	5,250.00
20 October 2025	Review updated presentation re: investigation for settlement meeting.	A Chase	0.60	948.00
20 October 2025	Review and revise settlement deck (0.9); correspond with D. Litz and D. Mago re: same (0.1); call with Alix, S. Greissman, A. Zatz, E. Feld, D. Litz and D. Mago re: same (0.5); debrief with A. Zatz re: same (0.2); review updated deck with S. Greissman's comments (0.3); correspond with Alix re: same (0.3); review further updated deck with additional comments (0.5); confer with A. Zatz re: same (0.1); confer with D. Litz re:	V Sachdev	5.40	7,668.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (0.1); review Alix's slides and comment on same (0.6); correspond with D. Mago and D. Litz re: same (0.1); call with Alix, S. Greissman, A. Zatz, E. Feld, D. Litz, and D. Mago re: revised slides (1.2); debrief call with A. Zatz (0.3); correspond with A. Zatz, D. Litz and D. Mago re: revised deck (0.2).			
20 October 2025	Meetings with S. Greissman re: deck edits (0.3); call with Alix & W&C teams re: deck (2.0); revise deck (4.6); confer with D. Mago re: same (0.2); eettlement deck revisions (1.0).	D Litz	8.10	11,097.00
20 October 2025	Research potential litigation issue applicability to settlement proceeds re: settlement proposal (1.0); meeting with G. Zahiremami re: same (0.1); analyze precedential case re: same (0.4).	R Beil	1.50	1,920.00
20 October 2025	Review D. Litz's comments to presentation and revise same (0.2); analyze plan re: general unsecured recoveries (0.1); revise presentation re: same (0.1); meeting with W&C and AlixPartners re: presentation (0.3); meeting with W&C team re: presentation next steps (0.1); analyze Alix partners presentation slides (0.3); call with D. Litz re: same (0.3); revise presentation (0.9); correspondence with AlixPartners re: same (0.1); attend meeting with W&C and AlixPartners re: same (1.1).	D Mago	3.50	3,465.00
21 October 2025	Preparation for settlement meeting (2.0); finalize deck for same (2.6); attend calls with financial advisor (0.7).	J Shore	5.30	13,250.00
21 October 2025	Prepare for mediation (0.5); review and revise materials (1.0); confer with C. Shore and S. Greissman re: same (1.3).	J Zakia	2.80	6,160.00
21 October 2025	Preparation for settlement meeting.	G Pesce	2.80	5,880.00
21 October 2025	Pre-settlement meeting call.	C West	0.90	1,611.00
21 October 2025	Calls re: settlement discussion.	E Smith	0.30	489.00
21 October 2025	Review updated slides for Committee meeting (0.2); call with C. Shore, S. Greissman, A. Zatz, E. Feld, D. Litz, D. Mago and Alix partners re: same in preparation for Committee call re: settlement conference (0.8); call with C. Shore, S. Greissman, A. Zatz, E. Feld, B. Lingle, D. Litz, E. Smith, A. Chase and Alix re: strategy (0.7); review final slides in advance of meeting (0.2) and correspond with A. Zatz, D. Litz, and Alix team re: same (0.1).	V Sachdev	2.00	2,840.00
21 October 2025	Revise presentation (0.2); attend meeting with W&C and AlixPartners re: presentation (0.8).	D Mago	1.00	990.00
22 October 2025	Meeting at Latham & Watkins with 1L lenders, company and advisors (4.5); follow up correspondence with Committee (0.6).	S Greissman	5.10	12,750.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 October 2025	Attend settlement meetings with adverse parties (4.9); follow-up calls and emails (3.1).	J Shore	8.00	20,000.00
22 October 2025	Prepare for settlement meeting (1.4); attend settlement meeting (4.9); follow up discussions with C. Shore re: same (0.5).	J Zakia	6.80	14,960.00
22 October 2025	Attend settlement meeting.	G Pesce	4.80	10,080.00
22 October 2025	Attending settlement meeting (4.9); and sending summary to Committee (0.5).	A Zatz	5.40	11,340.00
22 October 2025	Internal meetings re: settlement discussion progress, follow-up meetings and review materials re: same.	C West	1.30	2,327.00
22 October 2025	Assist with settlement discussions.	E Smith	1.00	1,630.00
22 October 2025	Participate in part of valuation settlement meeting (0.7); discuss settlement meeting with J. Zakia, C. Shore, and C. West (0.5).	A Chase	1.20	1,896.00
22 October 2025	Attend portions of settlement conference and breakout with members of Committee, W&C and Alix teams (3.5); call with E. Feld re: same (0.1); confer with D. Litz re: same (0.2); analyze lender group offer (0.2); confer with A. Zatz re: same (0.3).	V Sachdev	4.30	6,106.00
22 October 2025	Review summary of settlement conference.	A Hong	0.10	137.00
22 October 2025	Informal mediation / settlement conference with Debtors, Committee and Lenders re: settlement.	D Litz	6.00	8,220.00
22 October 2025	Review settlement materials from Latham & Watkins.	J Walz	0.20	174.00
23 October 2025	Follow up to settlement call (0.5); review updated 1L settlement proposal (0.5).	S Greissman	1.00	2,500.00
23 October 2025	Follow up on settlement.	J Shore	0.50	1,250.00
23 October 2025	Review presentation (0.3); review settlement (0.1).	C Koster	0.40	760.00
23 October 2025	Review Alix slides re: competing proposals (0.2) and A. Zatz' comments to same (0.1); call with Alix, C. Shore, S. Greissman, A. Zatz, B. Lingle, A. Chase, and D. Litz re: strategy in advance of Committee call (0.4).	V Sachdev	0.70	994.00
24 October 2025	Review Committee settlement proposal.	S Greissman	0.50	1,250.00
24 October 2025	Settlement emails.	J Shore	0.50	1,250.00
25 October 2025	Review Committee/revised settlement proposal.	S Greissman	0.60	1,500.00
25 October 2025	Reviewing settlement proposal and related correspondence.	A Zatz	0.30	630.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
29 October 2025	Calls with Alix and W&C teams re: settlement strategy.	J Shore	0.50	1,250.00
SUBTOTAL: Mediation			**167.40**	**308,395.00**

Professional Retention & Fees - W&C

1 October 2025	Review conflicts reports re: retention (0.5); email S. Ludovici re: same (0.1).	G Zahiremami	0.60	594.00
1 October 2025	Revise connections summary for W&C retention app (0.5); emails with W&C team re: Debtors' retention applications (0.1).	S Ludovici	0.60	666.00
2 October 2025	Review and revise retention application (2.7); revise same per comments from G. Pesce and C. Shore (0.2); confer with S. Ludovici re: same (0.2).	G Zahiremami	3.10	3,069.00
2 October 2025	Email with W&C team re: timekeeping (0.1); revise W&C retention application (1.1).	S Ludovici	1.20	1,332.00
3 October 2025	Review and revise W&C retention application (2.4); emails with G. Pesce re: same (0.1); email to Committee Chaiman re: same (0.1).	G Zahiremami	2.60	2,574.00
6 October 2025	Review W&C retention app.	S Greissman	0.40	1,000.00
6 October 2025	Revising W&C retention application.	A Zatz	0.60	1,260.00
6 October 2025	Review and revise W&C retention application per comments from W&C team (2.9); confer with same re: same (1.2); email to Committee Chairman re: same (0.1).	G Zahiremami	4.20	4,158.00
6 October 2025	Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	0.90	999.00
6 October 2025	Correspond with G. Zahiremami re: assistance with filings of retention applications (0.1); prepare for potential filings (0.9); review and respond to filings update with G. Zahiremami (0.1).	A Venes	1.10	539.00
7 October 2025	Review retention app and G. Zahiremami correspondence re: same (0.3); Committee correspondence re: retention app (0.2).	S Greissman	0.50	1,250.00
7 October 2025	Review and revise W&C retention application (1.3); confer with W&C team re: same (1.2).	G Zahiremami	2.50	2,475.00
7 October 2025	Emails with G. Zahiremami re: W&C retention application (0.1); review September fee issue (0.4); email with J. Walz and G. Zahiremami re: Plan comments (0.1); review correspondence re: Committee retention applications and comments to interim compensation and ordinary course	S Ludovici	0.90	999.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	professionals motions (0.3).			
8 October 2025	Review W&C retention application.	S Greissman	0.90	2,250.00
8 October 2025	Review and revise W&C retention application and prepare same for filing (2.3); confer with W&C team re: same (0.8).	G Zahiremami	3.10	3,069.00
8 October 2025	Review and respond to email from G. Zahiremami re: status of e-filing of retention applications (0.1); assist with finalizing for and e-filing of W&C and AlixPartners retention applications (0.5); correspond with W&C team re: same (0.1); serve courtesy copies of filings via email to Chambers and 2002 core parties list (0.2).	A Venes	0.90	441.00
9 October 2025	Review W&C retention application of responses to U.S. Trustee inquiry.	S Greissman	0.80	2,000.00
9 October 2025	Call with C. Koster re: W&C retention.	A Zatz	0.20	420.00
9 October 2025	Review US Trustee comments.	C Koster	0.50	950.00
9 October 2025	Implement US Trustee comments to proposed order (0.4); confer with S. Ludovici re: same (0.2).	G Zahiremami	0.60	594.00
9 October 2025	Review and address US Trustee comments to W&C retention application (0.3); further address US Trustee comments (0.1).	S Ludovici	0.40	444.00
10 October 2025	Telephone and emails internal re: US Trustee comments.	C Koster	0.60	1,140.00
10 October 2025	Call with G. Pesce re: US Trustee comments to retention order (0.1); draft summary of prior representation (0.4); emails with same and W&C team re: same (0.1).	G Zahiremami	0.60	594.00
10 October 2025	Call with C. Koster and A. Zatz re: US Trustee comments to W&C retention (0.2); review draft response to US Trustee (0.1).	S Ludovici	0.30	333.00
12 October 2025	Email with W&C team re: US Trustee comments.	S Ludovici	0.20	222.00
13 October 2025	Correspond with G. Pesce, G. Zahiremami re: W&C retention order and US Trustee inquiries.	B Lingle	0.30	411.00
13 October 2025	Draft responses to US Trustee questionnaire re: retention (2.3); confer with and emails to A. Zatz and G. Pesce re: same (0.3).	G Zahiremami	2.60	2,574.00
13 October 2025	Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	J Walz	4.40	3,828.00
14 October 2025	Review updated W&C retention disclosure.	S Greissman	0.20	500.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
14 October 2025	Review responses to US Trustee questionnaire re: retention (1.4); confer with and emails to A. Zatz and G. Pesce re: same (0.2); begin drafting supplemental declaration (0.4).	G Zahiremami	2.00	1,980.00
16 October 2025	Review expenses backup (0.1); review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.5).	S Ludovici	0.60	666.00
17 October 2025	Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	J Walz	2.90	2,523.00
18 October 2025	Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	J Walz	0.80	696.00
18 October 2025	Email with W&C team re: revised retention order.	S Ludovici	0.20	222.00
20 October 2025	Review revised W&C retention order.	B Lingle	0.30	411.00
20 October 2025	Prepare notice of filing of revised proposed order (0.7); confer with S. Ludovici and emails with W&C team re: same (0.8).	G Zahiremami	1.50	1,485.00
20 October 2025	Discussion with S. Ludovici re: fee applications.	J Walz	0.30	261.00
20 October 2025	Review draft NOF revised proposed order (0.4); call with J. Walz re: pro forma (0.3); Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (2.0).	S Ludovici	2.70	2,997.00
20 October 2025	Review and respond to email inquiry from G. Zahiremami re: submission of revised proposed order re: W&C retention application.	A Venes	0.10	49.00
21 October 2025	Review and revise proposed order (0.6); prepare same for filing (0.6); emails with W&C team re: same (0.2).	G Zahiremami	1.40	1,386.00
21 October 2025	Review and respond to email from G. Zahiremami re: assistance with submission of revised proposed order re: W&C retention application (0.1); compile revised proposed order and exhibit and send to G. Zahiremami for review ahead of submission (0.1); submit proposed revised order (0.1); confirm submission with G. Zahiremami (0.1).	A Venes	0.40	196.00
22 October 2025	Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	2.90	3,219.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
24 October 2025	Review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	0.30	333.00
25 October 2025	Emails with W&C team re: W&C retention issues.	S Ludovici	0.10	111.00
27 October 2025	Draft supplemental declaration (0.3); factual research re: same (0.3); revise supplemental declaration (0.6); confer with J. Walz re: October monthly (0.1); review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.9); review October fee application issue and confer with J. Walz (0.1); prepare supplemental disclosure re: W&C retention (0.2); discuss disclosure issue with A. Zatz (0.2); follow up with W&C team re: same (0.1).	S Ludovici	2.80	3,108.00
28 October 2025	Reviewing supplemental retention disclosure.	A Zatz	0.20	420.00
28 October 2025	Draft supplemental Pesce declaration (1.2); confer with W&C team re: same (0.4).	G Zahiremami	1.60	1,584.00
28 October 2025	Extensive correspondence with W&C team re: supplemental declaration (0.6); email with A. Cieply re: disclosure (0.1); revise supplemental declaration (0.3); emails with G. Pesce re: same (0.2); revise supplemental declaration (0.2).	S Ludovici	1.40	1,554.00
28 October 2025	Review and respond to email from S. Ludovici re: assistance with submission of G. Pesce's supplemental declaration re: W&C retention (0.1); prepare for submission of supplemental declaration (0.4); review and respond to filing status/update email from G. Zahiremami (0.1).	A Venes	0.60	294.00
29 October 2025	Review and revise Pesce supplemental declaration (1.2); confer with W&C team re: same (0.2); send same for filing (0.1).	G Zahiremami	1.50	1,485.00
29 October 2025	Follow up on supplemental declaration.	S Ludovici	0.30	333.00
29 October 2025	Review and respond to email from S. Ludovici re: assistance with submission of G. Pesce's supplemental declaration re: W&C retention (0.1); e-file supplemental declaration (0.1); email to Chambers re: same (0.1); proceed with service to master service list parties (0.1); update pleadings file (0.1); assist G. Zahiremami with e-filing and service of supplemental declaration of G. Pesce in support of W&C's retention (0.3); update pleadings file (0.1).	A Venes	0.90	441.00
30 October 2025	Review and file CNO.	C Koster	0.30	570.00
30 October 2025	Emails with W&C team re: W&C retention application CNO (0.2); review W&C retention application CNO and email with A. Zatz re: same (0.2); further review W&C	S Ludovici	0.50	555.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	retention application CNO (0.1).			
30 October 2025	Correspond with S. Ludovici re: assistance with drafting CNO for W&C retention application (0.1); draft CNO and send to team for review/comment (0.7); assist with e-filing of CNO (0.1); email to Chambers re: same (0.1); email to 2002 core list (0.1); update pleadings file (0.1).	A Venes	1.20	588.00
31 October 2025	Email with W&C team re: September (0.1); email with A. Hong re: connections disclosure (0.1); email with A. Hong re: parties searched (0.2).	S Ludovici	0.40	444.00
SUBTOTAL: Professional Retention & Fees - W&C			**64.00**	**68,596.00**

Professional Retention & Fees - Other

2 October 2025	Review analysis of Debtors retention applications.	B Lingle	0.30	411.00
2 October 2025	Review and comment on AlixPartners fee application (1.1); confer with S. Ludovici and A. Zatz re: same (0.3); email to AlixPartners team re: same (0.1).	G Zahiremami	1.50	1,485.00
3 October 2025	Emails to AlixPartners re: retention application.	G Zahiremami	0.10	99.00
6 October 2025	Reviewing ordinary course professionals and interim comp motions.	A Zatz	0.90	1,890.00
6 October 2025	Review and revise AlixPartners retention application (0.5); emails with same re: same (0.1).	G Zahiremami	0.60	594.00
6 October 2025	Review possible edits to draft Alix retention application.	S Ludovici	0.20	222.00
7 October 2025	Reviewing Alix retention application.	A Zatz	1.10	2,310.00
7 October 2025	Emails with Alix team re: filing (0.1); revise issues list re: interim compensation procedures and ordinary course professionals orders (0.3); confer with D. Litz re: same (0.1).	G Zahiremami	0.50	495.00
8 October 2025	Reviewing Debtors advisors' retention applications (2.0) and e-mail to Alix re: same (0.2).	A Zatz	2.20	4,620.00
8 October 2025	Prepare Alix retention application for filing (0.7); email to same re: same (0.1).	G Zahiremami	0.80	792.00
9 October 2025	Review interim compensation procedures and ordinary course professionals orders (0.2); confer with D. Litz re: same (0.1).	G Zahiremami	0.30	297.00
9 October 2025	Review US Trustee comments to Alix retention application.	S Ludovici	0.10	111.00
15 October 2025	Review Ordinary Course Professional declarations.	J Walz	2.30	2,001.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
28 October 2025	Call with L&W re: OCPs.	A Zatz	0.10	210.00
28 October 2025	Review of ordinary course professionals declarations.	J Walz	0.20	174.00
31 October 2025	Prepare CNO for AlixPartners retention application.	D Litz	0.70	959.00
SUBTOTAL: Professional Retention & Fees - Other			**11.90**	**16,670.00**

Reports, Schedules & US Trustee Issues

1 October 2025	Reviewing Alix's summary of schedules.	A Zatz	0.30	630.00
2 October 2025	Review correspondence re: SOFA and schedule analysis.	S Greissman	0.20	500.00
3 October 2025	Review schedules and SOFAs for bonus and retention payments.	A Chase	1.10	1,738.00
SUBTOTAL: Reports, Schedules & US Trustee Issues			**1.60**	**2,868.00**

Tax Issues

6 October 2025	Meeting with A. Zatz (0.2); reviewing tax disclosure (0.6).	D Dreier	0.80	1,880.00
SUBTOTAL: Tax Issues			**0.80**	**1,880.00**

TOTAL			**2,579.80**	**3,593,887.00**

Exhibit D

Sunmary of Expenses by Category

Category	Amount
Airfare	$5,532.30
Conference Room Dining	$1,228.62
Courier Service	$16.25
Deposition Transcripts	$6,920.30
Document Research	$297.20
E-Discovery Data Hosting / Storage	$352.17
E-Discovery User Fees	$1,350.00
Filing Fees	$100.00
Hotel Expense	$12,472.48
Overtime Meals	$28.42
Parking	$137.50
Printing	$75.09
Taxi - Business	$3,417.83
Travel Meals	$375.72
Grand Total	**$32,303.88**

Exhibit E

Detailed Statement of Expenses

Name	Date	English Narrative	Category	Amount
Sullivan, Janet	10/1/2025	E-Discovery Data Hosting / Storage	E-Discovery Data Hosting / Storage	$352.17
Sullivan, Janet	10/1/2025	E-Discovery User Fees	E-Discovery User Fees	$1,350.00
Zakia, Jason	10/2/2025	Car Service - home to airport - Attend depositions. - 24-Sep-2025	Taxi - Business	$141.11
Zakia, Jason	10/2/2025	Car Service - Ohare to home - Attend depositions. - 26-Sep-2025	Taxi - Business	$135.94
Zakia, Jason	10/2/2025	Car Service - terminal to office - Attend depositions. - 24-Sep-2025	Taxi - Business	$151.56
Greissman, Scott	10/2/2025	CAR SERVICE INVOICE#103235357-09/29/2025-Scott Greissman- RESV RECEIPT ID103235357-10583 LaGuardia Airport 11371 37	Taxi - Business	$311.21
Greissman, Scott	10/2/2025	Hotel stay by Greissman, Scott in Houston, Texas for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$1,302.53
Zakia, Jason	10/2/2025	One Way, Business Class airfare/fee on American Airlines from LGA to ORD for Zakia, Jason on 9/26/2025 for Attend Deposition (billed at 50%).	Airfare	$204.24
Zakia, Jason	10/2/2025	One Way, Business Class airfare/fee on American Airlines from ORD to LGA for Zakia, Jason on 9/24/2025 for Attend Deposition (billed at 50%).	Airfare	$221.74
Greissman, Scott	10/2/2025	Round Trip, Business Class airfare/fee on United Airlines Inc. from NYC to HOU and HOU to NYC for Greissman, Scott on 9/29/2025,10/01/2025 for Client Meeting (billed at 50%).	Airfare	$1,018.50
Greissman, Scott	10/2/2025	Taxi - Houston airport to W&C Houston office - Uber ride to W&C Houston office - 29-Sep-2025	Taxi - Business	$48.67
Greissman, Scott	10/2/2025	Ticketing Fee for airfare on United Airlines Inc. from NYC to HOU and HOU to NYC for Greissman, Scott on 9/29/2025	Airfare	$50.00
Slattery, Christine	10/3/2025	CT Corp.—Corporate Document Retrieval—ModivCare Solutions, LLC (DE)	Document Research	$297.20
Miranda, Loredana	10/3/2025	Hotel - Dinner - Client meeting - 29-Sep-2025 - Internal Guest L.Miranda - Client meeting - 29-Sep-2025	Travel Meals	$63.03
Miranda, Loredana	10/3/2025	Hotel - Dinner - Client meeting - 30-Sep-2025 - Internal Guest L.Miranda - Client meeting - 30-Sep-2025	Travel Meals	$40.31
Miranda, Loredana	10/3/2025	Hotel - Lunch - Client meeting - 01-Oct-2025 - Internal Guest L.Miranda - Client meeting - 01-Oct-2025	Travel Meals	$75.27
Miranda, Loredana	10/3/2025	Hotel stay by Miranda, Loredana at JW Marriot Houston in Houston, Texas for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$1,158.28
Greissman, Scott	10/3/2025	Judicial Transcribers Of Texas, LLC. Invoice Date: 02 October 2025. MOTION HEARING TRANSCRIPT | CASE NUMBER/JUDGE: 25-90309-11 / JUDGE ALFREDO R. PEREZ | DATE OF HEARING: SEPTEMBER 30, 2025	Deposition Transcripts	$243.00
Miranda, Loredana	10/3/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from NYC to HOU for Miranda, Loredana on 9/29/2025 for Client Meeting	Airfare	$892.02
Miranda, Loredana	10/3/2025	Ticketing Fee for airfare on Delta Airlines Inc. from NYC to HOU for Miranda, Loredana on 9/29/2025	Airfare	$50.00
Greissman, Scott	10/6/2025	Hotel - Car Service - Four Seasons Houston to Houston airport - from hotel to airport - 01-Oct-2025	Taxi - Business	$160.62
Zakia, Jason	10/7/2025	Catering services for ModivCare Deposition in Chicago provided by FLIK on 45925 for Continental Breakfast, Sandwiches, Afternoon Break and Beverages - Approximate headcount :8	Conference Room Dining	$519.55

Zakia, Jason	10/7/2025	Catering services for ModivCare Deposition in Chicago provided by FLIK on 45925 for Beverages - Approximate headcount :10	Conference Room Dining	$100.17
Zakia, Jason	10/7/2025	Catering services for ModivCare Deposition in Chicago provided by FLIK on 45925 for Continental Breakfast, Sandwiches, Afternoon Break and Beverages - Approximate headcount :6	Conference Room Dining	$389.66
Smith, Erin	10/8/2025	Filing Fees and Related - Filing fee incurred due to her motion to appear pro hac vice in the ModivCare case. - 02-Oct-25	Filing Fees	$100.00
Chase, Ashley	10/10/2025	Breakfast - Breakfast at airport. - 01-Oct-2025 - Internal Guest A.Chase - Breakfast at airport. - 01-Oct-2025	Travel Meals	$21.79
Wick, Katie	10/10/2025	GRUBHUB INVOICE#SL-227-283-ORDER#855831203180068-DELIVERY 2025-09-29 19:14:00 EDT DIG INN - Theater District to 1221 Avenue of the Americas Katie Wick-	Overtime Meals	$28.42
Chase, Ashley	10/10/2025	Hotel - Breakfast - Hotel Stay - JW Marriott Houston Downtown (Breakfast) - 29-Sep-2025 - Internal Guest A.Chase - Hotel Stay - JW Marriott Houston Downtown (Breakfast) - 29-Sep-2025	Travel Meals	$28.22
Chase, Ashley	10/10/2025	Hotel - Breakfast - Hotel Stay - JW Marriott Houston Downtown (Breakfast) - 30-Sep-2025 - Internal Guest A.Chase - Hotel Stay - JW Marriott Houston Downtown (Breakfast) - 30-Sep-2025	Travel Meals	$39.87
Chase, Ashley	10/10/2025	Hotel - Dinner - Hotel Stay - JW Marriott Houston Downtown (Dinner) - 28-Sep-2025 - Internal Guest A.Chase - Hotel Stay - JW Marriott Houston Downtown (Dinner) - 28-Sep-2025	Travel Meals	$64.43
Chase, Ashley	10/10/2025	Hotel - Dinner - Hotel Stay - JW Marriott Houston Downtown (Dinner) - 29-Sep-2025 - Internal Guest A.Chase - Hotel Stay - JW Marriott Houston Downtown (Dinner) - 29-Sep-2025	Travel Meals	$42.80
Chase, Ashley	10/10/2025	Hotel stay by Chase, Ashley at JW Marriot Houston in Houston, Texas for 4 days, 3 nights for Modivcare matter.	Hotel Expense	$1,597.02
Chase, Ashley	10/10/2025	Round Trip, Economy airfare/fee on United Airlines Inc. from EWR to HOU and HOU to EWR for Chase, Ashley on 9/28/2025 for Flight from HOU for Modivcare matters.	Airfare	$999.26
Chase, Ashley	10/10/2025	Taxi - airport/home - Uber from Newark airport home. - 01-Oct-2025	Taxi - Business	$296.32
Chase, Ashley	10/10/2025	Taxi - airport/hotel - Uber to hotel. - 28-Sep-2025	Taxi - Business	$30.54
Chase, Ashley	10/10/2025	Taxi - court/dinner - Uber from court to dinner with Loredana Miranda. - 30-Sep-2025	Taxi - Business	$12.87
Chase, Ashley	10/10/2025	Taxi - home/airport - Uber to Newark airport. - 28-Sep-2025	Taxi - Business	$125.88
Chase, Ashley	10/10/2025	Taxi - hotel/airport - Uber to Houston airport. - 01-Oct-2025	Taxi - Business	$61.65
Zakia, Jason	10/13/2025	Car Service - HOME TO TERMINAL - Attend DIP Hearing - 29-Sep-2025	Taxi - Business	$146.99
Zakia, Jason	10/13/2025	Car Service - OFFICE TO TERMINAL - Attend DIP Hearing - 02-Oct-2025	Taxi - Business	$137.16
Zakia, Jason	10/13/2025	Car Service - ORD TO HOME - Attend DIP Hearing - 02-Oct-2025	Taxi - Business	$131.76
Zakia, Jason	10/13/2025	Car Service - TERMINAL TO OFFICE - Attend DIP Hearing - 29-Sep-2025	Taxi - Business	$114.05
Shore, Christopher	10/13/2025	Hotel stay by Shore, Christopher at Four Seasons Hotel in Houston, Texas for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$1,204.25
Zakia, Jason	10/13/2025	Hotel stay by Zakia, Jason at JW Marriot Houston in Houston, Texas for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$1,055.34
Zatz, Andrew	10/13/2025	Hotel stay by Zatz, Andrew at Westin Hotel & Resort in Short Hills, New Jersey for 2 days, 1 nights for Modivcare matter.	Hotel Expense	$475.65
Zakia, Jason	10/13/2025	One Way, Economy airfare/fee on American Airlines from IAH to ORD for Zakia, Jason on 10/2/2025 for Attend DIP Hearing	Airfare	$524.48

Zakia, Jason	10/13/2025	One Way, Economy airfare/fee on American Airlines from ORD to IAH for Zakia, Jason on 9/29/2025 for Attend DIP Hearing	Airfare	$271.48
Shore, Christopher	10/13/2025	Parking - Airport Parking fee - 29-Sep-2025	Parking	$137.50
Shore, Christopher	10/13/2025	Round Trip, Economy airfare/fee on United Airlines Inc. from NYC to HOU and HOU to NYC for Shore, Christopher on 9/29/2025 for Flight to NYC for Modivcare matters.	Airfare	$583.92
Shore, Christopher	10/13/2025	Seat reservations fees for airfare on United Airlines Inc. from HOU to NYC for Shore, Christopher on 10/1/2025	Airfare	$96.74
Shore, Christopher	10/13/2025	Seat reservations fees for airfare on United Airlines Inc. from NYC to HOU for Shore, Christopher on 9/29/2025	Airfare	$37.61
Shore, Christopher	10/13/2025	Taxi - 1300 Lamar St, Houston, TX 77010, US/Terminal C, George Bush Intercontinental Airport (IAH), Houston, TX 77032, US - Ride to the houston airport - 01-Oct-2025	Taxi - Business	$92.48
Shore, Christopher	10/13/2025	Taxi - George Bush Intercontinental Airport (IAH), Houston, TX 77032, US / 1300 Lamar St, Houston, TX 77010, US - Ride from Airport to Hotel - 29-Sep-2025	Taxi - Business	$62.93
Shore, Christopher	10/13/2025	Ticketing Fee for airfare on United Airlines Inc. from NYC to HOU and HOU to NYC for Shore, Christopher on 9/29/2025	Airfare	$50.00
Greissman, Scott	10/14/2025	MODIVCARE, INC., ET AL / HEARING TRANSCRIPT | 25-90309-11 / JUDGE ALFREDO R. PEREZ	Deposition Transcripts	$32.40
Miranda, Loredana	10/16/2025	Taxi - 806 Main St, Houston, TX to George Bush Intercontinental Airport (IAH), Houston, TX - Uber ride from hotel to Houston airport - 01-Oct-2025	Taxi - Business	$123.73
Miranda, Loredana	10/16/2025	Taxi - Brooklyn, NY to LaGuardia Airport (LGA), Queens, NY - Uber ride from residence to airport - 29-Sep-2025	Taxi - Business	$51.01
Miranda, Loredana	10/16/2025	Taxi - George Bush Intercontinental Airport (IAH), Houston, TX to 609 Main St Ste 2900, Houston, TX - Uber ride from Houston airport to W&C Houston office - 29-Sep-2025	Taxi - Business	$88.67
Miranda, Loredana	10/16/2025	Taxi - Terminal C, LaGuardia Airport (LGA), Brooklyn, NY - Uber ride from airport to residence - 01-Oct-2025	Taxi - Business	$53.70
Miranda, Loredana	10/16/2025	Taxi - W&C NY office to Brooklyn, NY - Uber ride home from office - 09-Oct-2025	Taxi - Business	$82.85
Greissman, Scott	10/20/2025	Certified Copy of Transcript - David MacGreevey - in re: Modivcare., et al. - Job Date . 9/29/2025 Case No 25-90309 (ARP)	Deposition Transcripts	$1,929.70
Greissman, Scott	10/22/2025	CAR SERVICE INVOICE#103235428-10/01/2025-Scott Greissman- RESV RECEIPT ID11140634-11371 147 Moorland Drive, Scarsdale, NY, USA 10583 38	Taxi - Business	$312.23
Greissman, Scott	10/22/2025	Veritext, LLC. Invoice Date: 17 October 2025. Video - Initial Services | Modivcare Inc., Et Al. v. (2590309)	Deposition Transcripts	$1,300.00
Greissman, Scott	10/24/2025	Catering services for ModivCare Deposition in Houston provided by Mendocino Farms Catering on 45929 for Afternoon Snack - Approximate headcount :1	Conference Room Dining	$219.24
Greissman, Scott	10/24/2025	Veritext, LLC. Invoice Date: 22 October 2025. Video - Initial Services | Witness: Chad Shandler | Job #: 7625991 | Job Date: 9/26/2025	Deposition Transcripts	$870.00
Zakia, Jason	10/29/2025	Hotel stay by Zakia, Jason at The Time Square Edition in Miami, Florida for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$3,000.81
Zakia, Jason	10/30/2025	Car Service - aiport to home - Attend settlement meeting - 24-Oct-2025	Taxi - Business	$133.47
Zakia, Jason	10/30/2025	Car Service - aiport to office - Attend settlement meeting - 21-Oct-2025	Taxi - Business	$132.50
Zakia, Jason	10/30/2025	Car Service - home to aiport - Attend settlement meeting - 21-Oct-2025	Taxi - Business	$143.22
Zakia, Jason	10/30/2025	Car Service - meeting to airport - Attend settlement meeting - 24-Oct-2025	Taxi - Business	$134.71

Zakia, Jason	10/30/2025	Hotel stay by Zakia, Jason at Westin Hotels & Resorts in New York, New York for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$2,678.60
Zakia, Jason	10/30/2025	One Way, Economy airfare/fee on American Airline from LGA to ORD for Zakia, Jason on 10/24/2025 for Attend settlement meeting.	Airfare	$191.83
Zakia, Jason	10/30/2025	One Way, Economy airfare/fee on American Airline from ORD to LGA for Zakia, Jason on 10/21/2025 for Attend settlement meeting.	Airfare	$290.48
Zakia, Jason	10/30/2025	Ticketing Fee for airfare on American Airline from LGA to ORD for Zakia, Jason on 10/24/2025.	Airfare	$50.00
Greissman, Scott	10/31/2025	Houston's Courier. Invoice Date: 03 November 2025. From WHITE CASE - 532 VINCENT 609 MAIN 30TH FLOOR HOUSTON, TX 77002 to United States Bankruptcy Judge Alfredo R Perez 515 RUSK COURTROOM 400 HOUSTON, TX 77002	Courier Service	$16.25
Greissman, Scott	10/31/2025	ModivCare - Hearing Materials	Printing	$75.09
Greissman, Scott	10/31/2025	Veritext, LLC. Invoice Date: 29 October 2202. Transcript Services - Original Transcript(s) | Modivcare Inc., Et Al. v. (2590309(ARP))	Deposition Transcripts	$2,545.20

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: December 17, 2025 @ 4:00 p.m. (CT)

SECOND MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	10/1/2025	10/31/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$1,653,272.80 (80% of $2,066,591.00)	
Total expenses requested in this Fee Statement:	$17,382.17	
Total fees and expenses requested in this Fee Statement:	$1,670,654.97	
Blended hourly rate for professionals:	$1,032.83	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	55.6	$ 81,176.00
Kevin Nystrom	Partner & Managing Director	$1,430	0.2	286.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	37.7	53,345.50
Marc Brown	Partner & Managing Director	$1,415	27.9	39,478.50
Greg Magrisi	Partner & Managing Director	$1,250	35.9	44,875.00
Christopher Rubel	Partner	$1,225	80.1	98,122.50
Jerry Wang	Partner	$1,225	14.2	17,395.00
Johnny Lee	Partner	$1,225	73.9	90,527.50
Elizabeth S Kardos	Partner	$950	3.5	3,325.00
Ashutosh Panda	Director	$1,150	215.0	247,250.00
Joel Amico	Director	$1,150	142.7	164,105.00
Iain Nelson	Director	$1,120	41.7	46,704.00
Matthew D Gates	Director	$1,120	85.2	95,424.00
Ryan Komendowski	Director	$1,080	189.1	204,228.00
Matthew Root	Director	$1,000	105.7	105,700.00
Kaitlyn Sundt McClarren	Director	$715	4.6	3,289.00
Sam Lemack	Senior Vice President	$980	37.3	36,554.00
John Tutty	Senior Vice President	$950	108.6	103,170.00
Thomas G Prince	Senior Vice President	$950	86.5	82,175.00
Christopher Cuomo	Senior Vice President	$910	66.1	60,151.00
Jyoji Morimoto	Senior Vice President	$910	45.3	41,223.00
Susan Clark	Senior Vice President	$910	212.3	193,193.00
Chase Hood	Senior Vice President	$850	119.5	101,575.00

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Professional	Title	Rate	Hours	Fees
Brooke Filler	Senior Vice President	$605	2.4	1,452.00
Jennifer Braverman	Senior Vice President	$565	9.5	5,367.50
Lucas Lovatto	Vice President	$835	162.4	135,604.00
Lisa Marie Bonito	Vice President	$580	18.9	10,962.00
Francisco Carafi	Vice President	$445	15.5	6,897.50
Hugh Olohan	Analyst	$535	3.6	1,926.00
Total Hours and Fees for Professionals			**2,000.9**	**$ 2,075,481.00**
Less: 50% Travel Fees				(8,890.00)
Total Fees for Professionals				**$ 2,066,591.00**
Less: 20% Holdback				(413,318.20)
Total Fees for Professionals Less Holdback				**$ 1,653,272.80**

Average Billing Rate	**$ 1,032.83**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	41.8	$ 47,156.50
1.2	Meetings & Communication with UCC and Creditors	94.0	109,462.00
1.3	Prepare Committee Presentations	39.8	44,698.00
1.4	Meetings & Communication with Debtors	82.0	91,596.00
1.5	Mediation and Settlement Communications	41.5	46,443.50
1.6	DIP Financing and Cash Collateral	1.3	1,500.50
1.7	Liquidity and Cash Management	27.5	26,760.00
1.9	Business and Strategic Plan	803.6	799,469.50
1.10	Employee Compensation and Advisor Retention Matters	5.8	6,626.00
1.11	Financial and Other Diligence	136.8	145,923.00
1.12	Other Motions and Related Objections	12.7	15,680.00
1.13	Litigation Support & Investigations	89.1	93,646.00
1.14	Claims Analysis	104.8	101,254.00
1.15	Valuation and Solvency Analysis	383.6	410,092.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	21.1	22,230.00
1.18	Court Hearings and Status Conferences	18.4	21,752.50
1.19	Retention Application & Relationship Disclosures	21.3	15,331.50
1.20	Fee Applications & Fee Statements	24.5	17,774.00
1.22	Intercompany & Waterfall Analysis	37.3	40,306.00
1.31	Travel Time	14.0	8,890.00
	Total Hours and Fees By Matter Category Before Holdback	**2,000.9**	**$ 2,066,591.00**

Average Billing Rate $ 1,032.83

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Expense Category	Amount
Airfare	$ 1,214.39
Client Research	11,973.63
Ground Transportation	1,024.48
Lodging	3,000.00
Meals	169.67
Total Expenses	**$ 17,382.17**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this second monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from October 1, 2025 through October 31, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $2,066,591.00 and reimbursement of out-of-pocket expenses in the amount of $17,382.17 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $1,653,272.80 (80% of $2,066,591.00) and 100% of out-of-pocket expenses in the amount of $17,382.17 for a total amount of $1,670,654.97; and (iii) such other and further relief as this Court deems proper.

Dated: December 3, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Review open items issue and draft of workplan	0.7
10/03/2025	AP	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	CH	Review docket and update case milestone and hearing calendar	0.9
10/06/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JA	Draft of key items and workplan required to get to Confirmation hearing	1.1
10/06/2025	JL	Call with D. MacGreevey, K. McGlynn, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	LL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps.	0.5
10/06/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	SC	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/07/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/08/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
10/09/2025	AP	Participate in a call with A. Panda and C. Cuomo (AlixPartners) re: business plan process	0.4
10/13/2025	CC	Review: project deadlines and workstreams	0.4
10/13/2025	JA	Outline of key upcoming deliverables and build out work plan	1.1
10/14/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	CH	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	CC	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	CR	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	GM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	JA	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	JL	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	KBM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	MDG	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	RK	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	TGP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/21/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/28/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/28/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
Total Professional Hours			**40.7**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.5	$	3,650.00
Kathryn B McGlynn	$1,415	3.0		4,245.00
Greg Magrisi	$1,250	3.0		3,750.00
Christopher Rubel	$1,225	2.5		3,062.50
Jerry Wang	$1,225	0.5		612.50
Johnny Lee	$1,225	3.0		3,675.00
Ashutosh Panda	$1,150	3.9		4,485.00
Joel Amico	$1,150	5.9		6,785.00
Matthew D Gates	$1,120	3.0		3,360.00
Ryan Komendowski	$1,080	3.0		3,240.00
Thomas G Prince	$950	3.0		2,850.00
Christopher Cuomo	$910	2.3		2,093.00
Susan Clark	$910	0.5		455.00
Chase Hood	$850	3.9		3,315.00
Lucas Lovatto	$835	0.5		417.50
Lisa Marie Bonito	$580	0.2		116.00
Total Professional Hours and Fees		**40.7**	**$**	**46,111.50**

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Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, ongoing workstreams, and next steps	0.8
10/02/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	DM	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JA	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JA	Prepare for meeting with Committee re cash performance to date and other case updates	0.6
10/02/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	KBM	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	MDG	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/03/2025	MDG	Call with R. Biel (W&C) re: unencumbered assets and diligence	0.2
10/04/2025	AP	Review business plan projections	0.1
10/04/2025	AP	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	DM	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	JL	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	MB	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	RK	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/08/2025	CH	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	CH	Correspondence with J. Yoo (W&C) re: SOFA diligence items	0.3
10/08/2025	CR	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	JA	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	MDG	Call with R. Beil, V. Sachdev, and D. Litz (W&C) re: lien challenges	0.5
10/08/2025	MDG	Draft answers to W&C re: lien challenge questions	0.6
10/08/2025	RK	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/09/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	CH	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	DM	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JA	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JA	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	JA	Pre-call with W&C before UCC meeting to discuss agenda	0.5
10/09/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	KBM	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	KBM	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4

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10/09/2025	MDG	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	MDG	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/10/2025	MDG	Call with R. Beil (W&C) re: bank accounts	0.2
10/13/2025	CH	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	CR	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	JA	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	RK	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/14/2025	AP	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	AP	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	CH	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	CR	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	DM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	GM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	JA	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	JA	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	JT	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	JL	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	KBM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	MDG	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	MR	Analyze Moelis valuation materials.	1.4
10/14/2025	MR	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	MR	Prepare presentation materials for ModivCare valuation.	3.0
10/14/2025	RK	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	RK	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/15/2025	AP	Participate in a call with A. Panda, L. Lovatto (AlixPartners), D. Litz and others (W&C) re: Debtor operations and lien challenge.	0.5
10/15/2025	LL	Participate in a call with A. Panda, L. Lovatto (AlixPartners), D. Litz and others (W&C) re: Debtor operations and lien challenge.	0.5
10/16/2025	AP	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	CR	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore (W&C), D. MacGreevey, J. Lee, C. Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski re: weekly updates and strategies	0.5
10/16/2025	JA	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	JL	Call with D. MacGreevey, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	MDG	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	MDG	Correspondence with A. Zatz (W&C) re: claims	0.2
10/16/2025	RK	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/19/2025	AP	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	DM	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	JA	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	KBM	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	MDG	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	MR	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	RK	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/20/2025	CH	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	DM	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	DM	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	JA	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	JA	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	JT	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JT	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	MR	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	RK	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	RK	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/21/2025	AP	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CH	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	CH	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CR	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	CR	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CR	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	DM	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	DM	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	DM	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	GM	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JA	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JA	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JA	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	JT	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	JT	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JL	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	MDG	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	MDG	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	RK	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	RK	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/23/2025	AP	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	CH	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/23/2025	CR	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	DM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	DM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	GM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	JA	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	JA	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	JT	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	KBM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	KBM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	MDG	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	MDG	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/23/2025	RK	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	RK	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	TGP	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/28/2025	AP	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	CR	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	DM	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	JA	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/28/2025	JL	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	KBM	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	MDG	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	RK	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/29/2025	KBM	Review updates from Committee Counsel	0.4
10/30/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/30/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	MDG	Correspondence with W&C re: lien challenge due diligence	0.4
10/30/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
Total Professional Hours			**93.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	10.4	$	15,184.00
Kathryn B McGlynn	$1,415	6.7		9,480.50
Marc Brown	$1,415	0.4		566.00
Greg Magrisi	$1,250	4.4		5,500.00
Christopher Rubel	$1,225	5.2		6,370.00
Jerry Wang	$1,225	1.3		1,592.50
Johnny Lee	$1,225	4.9		6,002.50
Ashutosh Panda	$1,150	8.1		9,315.00
Joel Amico	$1,150	13.2		15,180.00
Matthew D Gates	$1,120	9.9		11,088.00
Ryan Komendowski	$1,080	10.6		11,448.00
Matthew Root	$1,000	6.5		6,500.00
John Tutty	$950	4.4		4,180.00
Thomas G Prince	$950	0.2		190.00
Chase Hood	$850	6.4		5,440.00
Lucas Lovatto	$835	0.5		417.50
Total Professional Hours and Fees		**93.1**	**$**	**108,454.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Draft Committee materials re case update and cash flows	1.2
10/01/2025	MDG	Prepare for oral presentation to Committee	0.5
10/01/2025	TGP	Create slides summarizing analysis of the Debtors' liquidity through week ended September 21st	0.6
10/02/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.8
10/02/2025	KBM	Finalize weekly committee update presentation	0.6
10/02/2025	KBM	Prepare for weekly committee presentation	0.6
10/02/2025	MDG	Prepare for oral presentation to Committee on SOFA/SOAL analysis	0.8
10/02/2025	TGP	Update weekly presentation for call with Committee members based on internal comments	0.5
10/03/2025	JA	Draft of preliminary materials for Committee meeting	0.7
10/06/2025	TGP	Update weekly presentation slides re: the Debtors' liquidity and performance	0.8
10/08/2025	JA	Draft materials for UCC committee meeting	1.3
10/08/2025	MDG	Follow up on Committee materials re: ordinary course professionals motion	0.6
10/08/2025	MDG	Update Committee presentation materials	1.7
10/08/2025	TGP	Update weekly presentation slides for call with Committee members	0.6
10/09/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.7
10/09/2025	JA	Draft of slides and perform edits to Committee presentation	1.0
10/09/2025	KBM	Finalize weekly Committee update presentation	0.6
10/09/2025	MDG	Prepare for oral presentation to Committee meeting	0.5
10/10/2025	CC	Begin to frame thesis and support of alternative case in presentation format	2.6
10/10/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.5
10/13/2025	CH	Draft materials for upcoming Committee call re: revised DIP budget and liquidity	1.3
10/13/2025	CH	Draft updates to UCC materials re: revised budget to incorporate comments from J. Amico (AlixPartners)	0.6
10/13/2025	CC	Update presentation outline based on valuation and other industry news	1.4
10/14/2025	CH	Draft updates to Committee materials re: revised DIP budget to incorporate new materials from FTI	0.9
10/15/2025	CC	Review weekly presentation for edits	0.2
10/15/2025	DM	Review draft presentation to ModivCare UCC re: weekly updates	0.6
10/15/2025	JA	Prepare weekly committee update materials	1.3
10/16/2025	KBM	Review weekly update presentation to the Committee	0.7
10/17/2025	JA	Draft of slides for upcoming settlement discussions	1.0
10/20/2025	DM	Review draft presentation to ModivCare UCC re: settlement strategy	1.0
10/20/2025	JA	Draft of material outline and additional analysis required for UCC meeting	1.2
10/21/2025	JA	Prepare slides for Committee re upcoming settlement discussions	1.5
10/22/2025	JA	Prepare materials for Committee meeting	1.5
10/23/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates and settlement progression	0.7
10/23/2025	JA	Draft of Committee materials re settlement update and next steps	1.5
10/23/2025	KBM	Review changes to weekly Committee update presentation	0.2
10/29/2025	CH	Prepare shell presentation of claims analysis for upcoming Committee meeting	1.1
10/29/2025	DM	Review and provide comments to presentation to ModivCare UCC re: weekly updates	0.5

AlixPartners

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Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	JA	Draft of update materials for meeting with Committee including various recovery scenarios and liquidity update	2.0
10/30/2025	CH	Prepare demonstratives and commentary for claims analysis presentation	2.2
10/30/2025	JA	Revisions to Committee materials based on comments received	0.5
10/30/2025	KBM	Review weekly presentation to the Committee	0.7
Total Professional Hours			**39.8**

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Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.8	$	7,008.00
Kathryn B McGlynn	$1,415	3.4		4,811.00
Joel Amico	$1,150	14.7		16,905.00
Matthew D Gates	$1,120	4.1		4,592.00
Thomas G Prince	$950	2.5		2,375.00
Christopher Cuomo	$910	4.2		3,822.00
Chase Hood	$850	6.1		5,185.00
Total Professional Hours and Fees		**39.8**	**$**	**44,698.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	MDG	Correspondence with FTI re: diligence list	0.5
10/06/2025	JW	Review business plan evaluation	1.1
10/07/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	CH	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	JA	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	JL	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	KBM	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	LL	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	MDG	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	RK	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	SC	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	TGP	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/09/2025	AP	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	CH	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CC	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	CR	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	JA	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	JT	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	LL	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps.	0.7
10/09/2025	MDG	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	MDG	Correspondence with FTI re: datasite access for W&C team	0.3
10/09/2025	MR	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	RK	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7

AlixPartners

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	TGP	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/13/2025	MDG	Correspondence with Moelis re: dataroom additional participant	0.2
10/14/2025	AP	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	CH	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	CR	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JW	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JA	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JT	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JL	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	KBM	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	LL	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	MDG	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	RK	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	SC	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/16/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	AP	Participate in a call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	AP	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	CH	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	CR	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	CR	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	DM	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	DM	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	JA	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JA	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	JA	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	JT	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JT	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	JL	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JL	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0

AlixPartners

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	JL	Participate in a call with A. Panda, G. Magrisi, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	KBM	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	MDG	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	RK	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	RK	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	RK	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JA	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	RK	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/21/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	CH	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	JA	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3

AlixPartners

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JL	Call with K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	KBM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	MDG	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	RK	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	AP	Participate in a call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	CH	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	CR	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	JA	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	JT	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	KBM	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	MDG	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3

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Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	RK	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/27/2025	DM	Emails with J. Shapiro (FTI) and J. Amico re: diligence related to projected ModivCare LC's	0.3
10/28/2025	AP	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	CH	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	GM	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	JA	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	MDG	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	RK	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/30/2025	AP	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	JA	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	JT	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	MDG	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	RK	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
Total Professional Hours			**82.0**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.4	$	6,424.00
Kathryn B McGlynn	$1,415	2.3		3,254.50
Greg Magrisi	$1,250	4.4		5,500.00
Christopher Rubel	$1,225	3.9		4,777.50
Jerry Wang	$1,225	3.4		4,165.00
Johnny Lee	$1,225	8.0		9,800.00
Ashutosh Panda	$1,150	9.7		11,155.00
Joel Amico	$1,150	9.7		11,155.00
Matthew D Gates	$1,120	4.7		5,264.00
Ryan Komendowski	$1,080	9.7		10,476.00
Matthew Root	$1,000	0.7		700.00
John Tutty	$950	4.2		3,990.00
Thomas G Prince	$950	1.5		1,425.00
Christopher Cuomo	$910	4.7		4,277.00
Susan Clark	$910	3.3		3,003.00
Chase Hood	$850	3.4		2,890.00
Lucas Lovatto	$835	4.0		3,340.00
Total Professional Hours and Fees		**82.0**	**$**	**91,596.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JT	Develop summary of hurdle analysis for presentation	2.8
10/21/2025	CR	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	JA	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	JT	Develop slides to illustrate settlement proposals in advance of UCC meeting	2.7
10/21/2025	JT	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	RK	Recreation of company waterfall analysis for settlement meeting discussions.	2.8
10/21/2025	RK	Update to analysis for company valuation slides in advance of committee meeting	1.7
10/21/2025	RK	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/22/2025	CR	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	CR	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	DM	Attend in person ModivCare settlement meetings with Debtors, Lenders and UCC professionals and principals	5.5
10/22/2025	DM	Review materials presented by Debtors at ModivCare settlement meetings	0.8
10/22/2025	JA	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	JA	In person settlement meetings Latham NYC office	5.0
10/22/2025	JA	Working session with J. Amico and J. Tutty (AlixPartners) re: side-by-side comparison of the settlement proposals	1.5
10/22/2025	JA	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	JT	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	JT	Refine side-by-side comparison of settlement offers and proposals	2.2
10/22/2025	JT	Working session with J. Amico and J. Tutty (AlixPartners) re: side-by-side comparison of the settlement proposals	1.5
10/22/2025	JT	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	RK	Attend settlement discussions with ModivCare (and advisors), 1L (and advisors), and UCC (and advisors).	5.0
10/22/2025	RK	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	RK	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/29/2025	TGP	Analyze settlement proposals	1.6
Total Professional Hours			**41.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.3	$	9,198.00
Christopher Rubel	$1,225	2.1		2,572.50
Joel Amico	$1,150	8.6		9,890.00
Ryan Komendowski	$1,080	11.6		12,528.00
John Tutty	$950	11.3		10,735.00
Thomas G Prince	$950	1.6		1,520.00
Total Professional Hours and Fees		**41.5**	**$**	**46,443.50**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/05/2025	CH	Analyze prepetition vendor payments	0.6
10/10/2025	KBM	Review updated DIP budget	0.7
Total Professional Hours			**1.3**

AlixPartners

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Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	0.7	$	990.50
Chase Hood	$850	0.6		510.00
Total Professional Hours and Fees		**1.3**	**$**	**1,500.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	CH	Review liquidity and variance reporting package for week ended 9/21	0.9
10/01/2025	TGP	Analyze the Debtors' actual performance versus budget through week ended September 21st	1.6
10/02/2025	KBM	Review weekly liquidity update analyses	0.6
10/03/2025	JA	Review liquidity and cash reporting results	0.5
10/06/2025	CH	Review variance reporting package for week ended 9/28	0.7
10/06/2025	JA	Analyze latest variance report and draft liquidity diligence questions	0.7
10/06/2025	TGP	Analyze the Debtors' variance report for the period ended September 28th	0.7
10/06/2025	TGP	Draft questions for the Debtors' re: the variance report for the period ended September 28th	0.4
10/09/2025	KBM	Review weekly liquidity analysis update for Committee	0.4
10/10/2025	CH	Analyze revised DIP budget and related assumptions	1.7
10/10/2025	JA	Analyze revised DIP forecast	0.7
10/13/2025	CH	Draft analysis re: bridge between beginning and ending cash in revised DIP budget	1.6
10/13/2025	CH	Draft bridge analysis and related commentary re: overlapping period between filed and revised DIP budgets	1.8
10/13/2025	CH	Draft comparative analysis re: forecasted and actual liquidity	1.4
10/13/2025	CH	Draft diligence questions for FTI re: revised DIP budget and related assumptions	0.7
10/13/2025	JA	Analyze revised 13 week forecast, reconcile to prior and prepare diligence questions	1.2
10/14/2025	CH	Analyze liquidity bridge analysis between filed and revised DIP budget prepared by Debtors	0.8
10/14/2025	CH	Analyze revised emergence cash sources and uses	0.6
10/14/2025	JA	Review revised cash forecast and reconcile changes to prior version	1.3
10/17/2025	CH	Review variance reporting package for week ended 10/12	0.8
10/20/2025	CH	Draft analysis and demonstratives for weekly liquidity reporting	1.3
10/20/2025	CH	Draft diligence questions for FTI re: weekly liquidity reporting	0.3
10/20/2025	JA	Analyze cash scenarios under various scenarios based on latest Debtor's cash reporting	0.5
10/24/2025	CH	Review variance reporting package for week ended 10/19	0.8
10/24/2025	JA	Review various adjustments at effective date and liquidity status	0.6
10/27/2025	CH	Draft analysis and demonstratives for weekly liquidity reporting for upcoming Committee meeting	1.4
10/27/2025	JA	Review latest cash variance reporting, analyze variance and reconcile to original budget	0.7
10/28/2025	JA	Analyze certain emergence liquidity items and scenarios	1.1
10/29/2025	CH	Review surety bond and letter of credit supporting detail	0.5
10/29/2025	JA	Analyze variance reports and determine impact on go forward liquidity	0.5
10/31/2025	JA	Analyze certain contractual surety and LC requirements	0.7
Total Professional Hours			**27.5**

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	1.0	$	1,415.00
Joel Amico	$1,150	8.5		9,775.00
Thomas G Prince	$950	2.7		2,565.00
Chase Hood	$850	15.3		13,005.00
Total Professional Hours and Fees		**27.5**	**$**	**26,760.00**

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	AP	Analyze customer contract attrition and revenue impacts for RPM business for the top 20 contracts	2.8
10/01/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
10/01/2025	AP	Update Information requests to discuss with Debtor's financial advisor in support of FY26-30 business plan	2.9
10/01/2025	JL	Review data documents and received files and add follow up request items or status inquiry on outstanding items for business plan /financial projections review	1.4
10/01/2025	LL	Analyze service expense as % of revenue data for NEMT, PCS and RPM/Higi to develop hypotheses on performance improvement levers	1.8
10/01/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.9
10/01/2025	SC	Create slides for initial view point on G&A costs for business plan workstream	2.1
10/01/2025	SC	Gather and analyze financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.4
10/01/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	1.6
10/02/2025	AP	Prepare outline of draft business plan review report re: Debtor's business plan projections filed on 9/23	2.7
10/02/2025	AP	Review cost details and unit cost economics for the NEMT business segment	2.5
10/02/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.7
10/02/2025	LL	Conduct initial assessment of segment-level financials and cost allocations; compared plan margins to historical performance and peer benchmarks.	2.8
10/02/2025	LL	Prepare interim report and status updates with market and company research preliminary findings.	0.6
10/02/2025	LL	Research US Home Personal Care Services market to understand historical performance and growth trends for comparison with management's forecast	1.8
10/02/2025	LL	Review management’s consolidated business plan and supporting model to identify key assumptions requiring validation; aligned analytical priorities with Managing Director	2.8
10/02/2025	SC	Create slides for initial view point at business level for discussions with UCC.	2.8
10/02/2025	SC	Develop slides for initial view point on G&A costs for business plan workstream	2.6
10/02/2025	SC	Gather and analyze financial data from publicly available sources and provided by Debtor to create model for business plan workstream	2.4
10/02/2025	SC	Review financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.4
10/02/2025	TGP	Analyze documents uploaded to data room related to the Debtors' business plan	2.6
10/03/2025	AP	Prepare status dashboard for Information requests to discuss with Debtor's financial advisor in support of FY26-30 business plan	3.1
10/03/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.4
10/03/2025	AP	Review new data and files received from Debtor's advisors re: Debtor's business plan projections filed on 9/23	2.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	GM	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	JW	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	LL	Analyze September 2025 YTD third-party spend data to identify spending trends, cost drivers, and potential opportunities for vendor optimization	2.4
10/03/2025	LL	Analyze segment-level P&L and EBITDA bridge to evaluate the validity of management's underlying cost assumptions	1.8
10/03/2025	LL	Develop inferences from historical and trend data for PCS, evaluating revenue, service expense, G&A, Adjusted EBITDA, hours billed, wages, and revenue per hour to identify performance drivers and financial patterns	2.4
10/03/2025	LL	Supported sensitivity analysis of NEMT and PCS service expense based on revised EBITDA scenarios	1.4
10/03/2025	SC	Analyze employee census data provided by Debtors to get functional view of headcount costs for business plan workstream	2.9
10/03/2025	SC	Create slides on initial viewpoint of financials and headcount for discussion with UCC.	2.1
10/03/2025	SC	Develop slides for initial view point on G&A costs for business plan workstream	1.3
10/03/2025	SC	Review financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.8
10/06/2025	AP	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.6
10/06/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.6
10/06/2025	AP	Update information requests and status dashboard to discuss with Debtor's financial advisor in support of FY26-30 business plan	1.1
10/06/2025	FC	Research ModivCare and subsidiaries public data from 10-k and social networks to define public employment and compensation detail	1.3
10/06/2025	FC	Evaluate data and summarize comparable employment metrics	0.2
10/06/2025	FC	Analyze ModivCare S&M and G&A profiles from public social network	1.8
10/06/2025	FC	Analyze ModivCare COGS and R&D profiles from public social network.	1.9
10/06/2025	FC	Run code to Merge scraped data.	0.3
10/06/2025	GM	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	JW	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	LL	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	LL	Conduct assessment of indirect-spend categories targeted for tail-spend controller program; identified baseline addressable spend and expected savings rates.	2.5
10/06/2025	LL	Perform detailed variance analysis on NEMT ambulatorial segment, comparing actuals vs. forecast and identifying drivers of underperformance.	2.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/06/2025	LL	Updated vendor categorization according to cost center, business unit and expense type across fragmented data received	2.5
10/06/2025	SC	Analyze financial and census data for hypothesis creation as part of business plan workstream.	2.8
10/06/2025	SC	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	SC	Create support slides for hypothesis developed for G&A functions	2.9
10/06/2025	SC	Develop savings hypothesis for G&A functions as part of business plan workstream.	1.2
10/06/2025	SC	Review slides for hypothesis developed for G&A functions	2.6
10/06/2025	TGP	Analyze the Debtors' historical financials	2.3
10/06/2025	TGP	Analyze the Debtors' projections	2.9
10/07/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.8
10/07/2025	AP	Review cost details and unit cost economics for the NEMT business segment	2.7
10/07/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
10/07/2025	FC	Anonymize company data, translate job titles, and process headcount with ML model.	0.8
10/07/2025	FC	Harmonize and clean collected data removing duplicates and mismatched companies	1.1
10/07/2025	FC	Map employees seniority, geocode data, and group profiles by subsidiary.	2.1
10/07/2025	LL	Analyze supplier-rationalization pipeline; flagged categories with overlapping vendors and limited sourcing leverage.	2.8
10/07/2025	LL	Review 2022-2024 10K and 10Q documents re: service expense composition for each business unit and trends.	1.7
10/07/2025	LL	Review supplier data supporting tail-spend program; identified duplicate vendors and low-value POs suitable for consolidation	2.2
10/07/2025	LL	Updated data request after alignment and clarification with Debtor advisors	0.5
10/07/2025	SC	Create support slides for hypothesis developed for G&A functions	2.8
10/07/2025	SC	Develop savings hypothesis for G&A functions as part of business plan workstream.	2.6
10/07/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.9
10/07/2025	SC	Review slides for hypothesis developed for G&A functions	1.8
10/07/2025	TGP	Analyze the Debtors' board materials with respect to budgets and projections	2.4
10/07/2025	TGP	Analyze the Debtors' projections over time and identify changes for reconciliation	2.6
10/08/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.8
10/08/2025	AP	Review cost details and unit cost economics for the PCS business segment	2.7
10/08/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.9
10/08/2025	CC	Coordinate responsibilities related to business plan	0.4
10/08/2025	FC	Analyze headcount data comparables	1.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/08/2025	FC	Update classification dataset and generate headcount landscape report.	2.9
10/08/2025	FC	Analyze various compensation data for public sources	0.6
10/08/2025	FC	Integrate labor cost data into the final report.	1.5
10/08/2025	JL	Analyze implied financial performance metrics (margins of business segments, historic trend, and potential impact of united healthcare change to business.	1.2
10/08/2025	JL	Provide comments to team on potential areas to address and priorities for business plan/projections review	0.4
10/08/2025	LL	Analyze NEMT contact-center staffing and fully loaded cost of internal HC vs. contracted BPO operators	1.4
10/08/2025	LL	Develop savings bridge linking tail-spend reduction to forecast SG&A improvements.	2.8
10/08/2025	LL	Research personal care, administrative and call center job descriptions on Debtor's website for job function mapping.	2.0
10/08/2025	LL	Review employee census re: service expense organizations to assess baseline	1.8
10/08/2025	SC	Analyze financial and census data to create G&A function hypotheses as part of business plan workstream.	2.7
10/08/2025	SC	Create support slides for hypothesis developed for G&A functions	2.8
10/08/2025	SC	Develop labor model to analyze census data and create hypotheses for G&A functions	2.3
10/08/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.2
10/08/2025	TGP	Analyze the Debtors' historical financials and prepare supporting slides	2.7
10/08/2025	TGP	Analyze the Debtors' projections over time and identify key drivers	2.4
10/09/2025	AP	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.4
10/09/2025	AP	Review cost details and unit cost economics for the RPM/Higi business segment	2.1
10/09/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.5
10/09/2025	CC	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	CC	Develop question list for Modivcare re: key drivers	2.2
10/09/2025	CC	Participate in a call with A. Panda and C. Cuomo (AlixPartners) re: business plan process	0.4
10/09/2025	CC	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: review of uptier and EBITDA outlook	0.3
10/09/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: business plan responsibilities	0.5
10/09/2025	CC	Review business plan model drivers and key inputs	2.8
10/09/2025	CC	Review lender presentation, earnings transcripts, and public documents for operating history	2.9
10/09/2025	JL	Add follow up items in tracker for team to address with FTI and Moelis re: the business plan/projections	0.4

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Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JL	Call with A. Panda, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	JL	Provide comments on analysis for projections and identified savings	0.6
10/09/2025	LL	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps.	0.7
10/09/2025	LL	Evaluate potential cost improvement initiatives for NEMT and PCS contact centers; quantified labor-arbitrage savings and one-time transition costs.	2.2
10/09/2025	LL	Review outsourced labor contracts to compare scope, terms and rates across suppliers	1.4
10/09/2025	LL	Review top outsourced labor vendor contracts re: terms, rates, and structure.	2.0
10/09/2025	LL	Summarize top outsourced labor vendor contracts to compare terms, rates, services provided and contract structures.	1.0
10/09/2025	RK	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: review of uptier and EBITDA outlook	0.3
10/09/2025	SC	Analyze census data and refine data to create baseline as part of business plan workstream.	2.0
10/09/2025	SC	Create labor model based on census data as part of business plan workstream.	2.3
10/09/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.5
10/09/2025	SC	Review labor model based on census data, and research metrics to add as part of business plan workstream.	2.7
10/09/2025	SC	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps.	0.7
10/09/2025	TGP	Analyze changes in operating expenses over time	2.6
10/09/2025	TGP	Analyze the labor related expenses in projection model	2.8
10/09/2025	TGP	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: business plan responsibilities	0.5
10/10/2025	AP	Continue to prepare NEMT Customer Request for Proposal Summary to show the Debtor assumption on request for proposal outcome	2.5
10/10/2025	AP	Prepare NEMT Customer Request for Proposal summary to show key request for proposal milestones, annual contract value, 2025 and 2025 forecast revenue	2.9
10/10/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.6
10/10/2025	CC	Respond to D. MacGreevey (AlixPartners) re: contract losses	0.8
10/10/2025	JL	Review business plan and projections	0.5
10/10/2025	JL	Provide comments on outstanding requests and priority of requests along with additional areas to address	0.3
10/10/2025	LL	Analyze September 2025 LTM third party spend data re: potential cost improvement opportunities	3.0
10/10/2025	LL	Prepare interim materials summarizing contact-center improvement levers and impact on cost structure post-implementation.	2.4
10/10/2025	LL	Research automation-driven call-deflection potential; estimated reduction in inbound volume and resulting FTE requirement changes.	2.6

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/10/2025	SC	Refine labor model to develop savings hypotheses as part of business plan workstream.	2.6
10/10/2025	TGP	Analyze the Debtors' historical financials	2.9
10/12/2025	CC	Assess competitor revenue outlook based on proxy statement	1.2
10/12/2025	CC	Review financial model assumptions re: key performance indicators	0.4
10/12/2025	CC	Review historical 10-Ks and filings for history, exposure, revenue trends, contract types	0.9
10/12/2025	CC	Review investor deck from May 2024 for business outlook	1.1
10/12/2025	CC	Review Moelis valuation for perspective on comparables and trends	0.7
10/13/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	2.6
10/13/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/13/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
10/13/2025	CC	Continue to review Moelis valuation for perspective on health care trends embedded into forecasts	0.9
10/13/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: planning on financial model	0.5
10/13/2025	CC	Review competitor transcripts for perspective on home care industry	0.4
10/13/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JL	Prepare questions and discussion items for C. Shandler meeting	0.8
10/13/2025	JL	Prepare questions and discussion items for meeting with K. Shepard	1.3
10/13/2025	JL	Prepare questions and discussion items for meeting with S. Kern from Debtors	1.8
10/13/2025	LL	Analyze field operations structure to identify organizational design improvement initiatives.	1.8
10/13/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	LL	Prepare organizational effectiveness model for field operations estimating potential savings.	2.7

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/13/2025	LL	Prepare interview questions re: NEMT business and projections for informal call with Ken Shepard (10/16).	2.5
10/13/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.6
10/13/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.7
10/13/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	SC	Refine labor model to develop savings hypotheses as part of business plan workstream.	2.6
10/13/2025	SC	Review materials for support of G&A workstream for business plan workstream, identifying cost savings opportunities, analyzing census materials, researching on health care industry and trends,	1.9
10/13/2025	TGP	Create model to analyze the Debtors' projections by business unit	2.7
10/13/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: planning on financial model	0.5
10/13/2025	TGP	Update model to analyze the Debtors' projections by business unit based on analysis of the Debtors' costs	1.9
10/14/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	1.9
10/14/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.6
10/14/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
10/14/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: initial review of financial model	0.3
10/14/2025	CC	Review ModivCare transcripts for historical perspective	1.4
10/14/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8

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10/14/2025	JL	Review model and files received from debtors for business plan/projections and note follow up requests needed or confirmation of understanding	1.5
10/14/2025	JL	Update tracker for this week's meetings with Debtor for business plan and projection items	1.3
10/14/2025	LL	Conduct research on state-by-state Medicaid PCS reimbursement structures; compiled rate schedules and recent CMS updates impacting core markets.	2.8
10/14/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	LL	Perform multivariate analysis quantifying correlation between state reimbursement trends and ModivCare revenue variance	3.0
10/14/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.6
10/14/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	1.3
10/14/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	2.2
10/14/2025	SC	Review materials of support for additional cost opportunity within G&A for business plan workstream	2.9
10/14/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: initial review of financial model	0.3
10/15/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	2.6
10/15/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.9
10/15/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.5
10/15/2025	CC	Begin to model framework for alternative case	1.2
10/15/2025	CC	Update financial model re: checks and income statement	1.6
10/15/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	CC	Research and send messages to A. Panda of AlixPartners re: margin outlook	0.4
10/15/2025	CC	Review management meeting questions in advance of meetings	0.6
10/15/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4

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10/15/2025	JL	Review files received from debtors on financial projections/ assumptions and notating additional requests	1.3
10/15/2025	JL	Review, edit and add items to questions and discussion items with debtors for business plan items and files received	1.4
10/15/2025	LL	Analyze cost and operations center labor cost structure to assess potential opportunities for cost improvement in the NEMT business unit.	2.5
10/15/2025	LL	Analyze labor and non-labor Cost of Goods Sold (COGS) structure based on new data provided by Debtor to refine working hypotheses	2.0
10/15/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	LL	Review state procurement and managed-care contract data to identify rate caps and recent competitive rebids affecting pricing assumptions	2.6
10/15/2025	SC	Analyze data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	1.9
10/15/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.9
10/15/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	2.5
10/15/2025	SC	Identify additional cost opportunities within G&A for business plan workstream	3.0
10/15/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/16/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	0.8
10/16/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.1
10/16/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
10/16/2025	CC	Begin to build out model checks across income statement	2.9
10/16/2025	CC	Continue to build out cases summary tab in financial model	3.0
10/16/2025	LL	Assess NEMT contact center call volume and cost per call and recalculate annual savings.	1.8
10/16/2025	LL	Research metrics (potential eligibility, average savings, industry practices) for rideshare as an alternative to traditional NEMT transportation for low-acuity and outpatient cases.	2.0
10/16/2025	LL	Review customer contracts to pinpoint specific contact center operations terms and service levels.	2.1
10/16/2025	SC	Analyze census data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	2.4
10/16/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	2.2
10/16/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	1.8
10/16/2025	SC	Review materials of support for additional cost opportunity within G&A for business plan workstream	2.1
10/17/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	1.3
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.7
10/17/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
10/17/2025	CC	Formulate questions in advance of call with C. Shandler of FTI	1.3
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	JL	Draft diligence questions for management re business plan	0.5
10/17/2025	LL	Analyze transport provider data to assess potential opportunities for cost improvement in the NEMT business unit.	2.5
10/17/2025	LL	Coordinate with valuation workstream to ensure revised operating projections flow through to enterprise-value sensitivity model.	1.8
10/17/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	LL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	LL	Update executive-summary slides highlighting cumulative transformation savings.	1.3
10/17/2025	SC	Analyze census data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	2.4
10/17/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	2.1
10/17/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/19/2025	SC	Develop additional hypotheses for cost opportunity within G&A for business plan workstream	2.8
10/19/2025	SC	Research public company costs to support G&A workstream for business plan workstream	2.4
10/19/2025	SC	Review labor model and create materials to support hypotheses as part of business plan workstream.	2.9
10/20/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.1
10/20/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.6
10/20/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.1
10/20/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
10/20/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	CC	Review latest due diligence information download in data room re forecasts	0.6
10/20/2025	CC	Review ModivCare financials for historical perspective	0.7
10/20/2025	CC	Update ModivCare financial model for summary statistics	1.8
10/20/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	IN	Draft initial cost management hypotheses for third-party spend	1.2
10/20/2025	IN	Draft initial hypotheses for internal/ external labor cost reductions	1.8
10/20/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	IN	Review data room management presentations	0.6
10/20/2025	IN	Review documents in data room	1.8
10/20/2025	IN	Update Excel file for third-party spend	1.2
10/20/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	JL	Review and update business plan analysis	1.5

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10/20/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	LL	Analyze fragmented tail vendors to identify addressable vs. non-addressable spend for a potential savings initiative.	2.0
10/20/2025	LL	Analyze third party spend data to identify categories, top vendors and potential cost improvement opportunities.	3.0
10/20/2025	LL	Map branch operations and management HC to assess labor baseline and potential organizational improvement opportunities	1.4
10/20/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	SC	Analyze third party costs associated with G&A workstream for business plan workstream	1.5
10/20/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.6
10/20/2025	SC	Develop hypotheses for third party costs associated with G&A workstream for business plan workstream	1.8
10/20/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/20/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	SC	Revise hypotheses for cost opportunity within G&A for business plan workstream	2.7
10/20/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/21/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.3
10/21/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	1.4
10/21/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.6
10/21/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.7
10/21/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	GM	Conduct Business Plan and CapEx analysis	0.5
10/21/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	IN	Categorize CapEx projects to model savings	1.4
10/21/2025	IN	Create PowerPoint materials for CapEx categorization	2.2

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10/21/2025	IN	Participate in a call with I. Nelson, S. Clark (AlixPartners) re: Technology Labor Spend	0.8
10/21/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	IN	Update CapEx cost optimization model	1.4
10/21/2025	IN	Update PowerPoint materials for CapEx with commentary	1.6
10/21/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	JL	Review and provide edits to revised business plan expert report	2.2
10/21/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review.	1.6
10/21/2025	LL	Analyze outsourced labor contracts for customer support to determine scope, contract structure, rates and other terms to identify potential overlap and cost improvement opportunities.	1.8
10/21/2025	LL	Analyze role titles, compensation and seniority levels to assess organizational design improvement opportunities	3.0
10/21/2025	LL	Map contact center roles for NEMT and PCS, both internal staff and contract labor, to assess total spend baseline	1.6
10/21/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review.	1.6
10/21/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/21/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	SC	Participate in a call with I. Nelson, S. Clark (AlixPartners) re: Technology Labor Spend	0.8
10/21/2025	SC	Review materials for support of G&A workstream for business plan workstream	2.5
10/21/2025	SC	Revise hypotheses for cost opportunity within G&A for business plan workstream	2.7
10/21/2025	TGP	Analyze the Debtors' financial projections	2.1
10/21/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/22/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.9
10/22/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/22/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.4

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10/22/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
10/22/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	GM	Conduct Business Plan and CapEx analysis	2.0
10/22/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	IN	Create PowerPoint materials for third-party spend savings	1.4
10/22/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	IN	Develop savings model in excel for third party spend	1.9
10/22/2025	IN	Define vendor classification and tail spend model	1.8
10/22/2025	IN	Update third party spend savings levers	1.7
10/22/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	JL	Provide comments to business plan analysis	2.0
10/22/2025	JL	Review projection model and quantify proposed changes	1.8
10/22/2025	LL	Analyze debtor's Mobility forecast to assess trip mix-shift trends by trip category, contract and payment structure.	3.0
10/22/2025	LL	Analyze rideshare spend data (TTM) to assess spend efficiency and potential to address cancellation fees spend.	2.5
10/22/2025	LL	Compared forecasted trip data with actuals for commercial transport providers, rideshare, mileage reimbursement and mass transit to understand rideshare adoption momentum.	1.7
10/22/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend.	0.8
10/22/2025	TGP	Analyze the Debtors' projected costs	1.2
10/23/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.3
10/23/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.7
10/23/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/23/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.8
10/23/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	DM	Review draft UHC contract comps for ModivCare contract termination 9019	0.6
10/23/2025	GM	Conduct Business Plan and CapEx analysis	2.0
10/23/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	IN	Define offshoring limits for labor model cost optimization	1.4
10/23/2025	IN	Develop labor model cost optimization role classification in Excel	1.3
10/23/2025	IN	Draft labor optimization PowerPoint slide	1.1

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Re: Business and Strategic Plan
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	IN	Labor model cost optimization model development	1.9
10/23/2025	IN	Update CapEx optimization PowerPoint slide	0.6
10/23/2025	IN	Update CapEx spend model assumptions in Excel	1.2
10/23/2025	IN	Update labor cost optimization PowerPoint slide	1.0
10/23/2025	JL	Provide comments to business plan analysis	1.4
10/23/2025	JL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	LL	Analyze PCS COGS and Opex GL data from 2023 to 2025 to assess profitability and staffing expenses by state.	3.0
10/23/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Levitt, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck.	0.4
10/23/2025	LL	Refine cost improvement levers for NEMT and PCS contact center operations, run-rate benefits and potential implementation roadmap.	2.8
10/23/2025	LL	Research cost to achieve re: service expense cost improvement initiatives.	1.8
10/23/2025	SC	Create presentation materials for G&A workstream in business plan review	2.4
10/23/2025	SC	Evaluation of potential cost savings opportunities	1.9
10/23/2025	SC	Analysis of census materials for business plan review	2.3
10/23/2025	SC	Research on health care industry trends	2.5
10/23/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/23/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	SC	Review materials in support of cost savings opportunities for business plan workstream	1.2
10/23/2025	TGP	Analyze the Debtors' projected revenue	0.8
10/24/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
10/24/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	1.9
10/24/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	AP	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.1
10/24/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.9
10/24/2025	CH	Review draft business plan materials	1.1
10/24/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	CC	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	DM	Review and provide comments on draft Magrisi expert report re: ModivCare business plan	4.3

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/24/2025	GM	Conduct Business Plan and CapEx analysis	4.0
10/24/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	GM	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	IN	Finalize Labor cost optimization PowerPoint materials	1.8
10/24/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	IN	Update CapEx optimization model	1.2
10/24/2025	IN	Update CapEx optimization PowerPoint slide	0.3
10/24/2025	IN	Update labor cost optimization model in Excel	1.7
10/24/2025	IN	Update labor optimization model in Excel	1.9
10/24/2025	JW	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	JA	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	JA	Review and provide comments on business plan report	1.0
10/24/2025	JL	Analyze EBITDA upside calculation	1.3
10/24/2025	JL	Provide comments on business plan report	1.8
10/24/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	JL	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	LL	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report.	0.7
10/24/2025	LL	Refine contact center improvement opportunities based on expert interviews applied to ModivCare specific case.	1.5
10/24/2025	LL	Research PCS reimbursement rates from 2022 to 2024 for PA, NY, NJ, MA, CT, WV and FL to compare with ModivCare rates and trends.	2.8
10/24/2025	LL	Update report with baseline, findings, opportunity sizing, cost to achieve and timeline for run-rate savings.	2.8
10/24/2025	MDG	Review business plan report	0.9
10/24/2025	MR	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report.	0.7
10/24/2025	RK	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7

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10/24/2025	RK	Review draft business plan report.	2.6
10/24/2025	SC	Create presentation materials to quantify G&A savings	2.4
10/24/2025	SC	Review of cost savings opportunities and prioritize based on impact ability	2.6
10/24/2025	SC	Review of health care trends vs. Debtors proposed budget	2.8
10/24/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.9
10/24/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	SC	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	SC	Review materials in support of cost savings opportunities for business plan workstream	0.7
10/25/2025	GM	Conduct Business Plan and CapEx analysis	0.5
10/26/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.5
10/26/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.4
10/26/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/26/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.6
10/26/2025	GM	Conduct Business Plan and CapEx analysis	0.7
10/26/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.7
10/26/2025	SC	Update slides for support of G&A workstream for business plan workstream	2.5
10/27/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.2
10/27/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/27/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.1
10/27/2025	AP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.1
10/27/2025	CC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	GM	Review Business Plan and CapEx analysis and materials	0.5
10/27/2025	IN	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	JA	Review and provide comments on business plan report	1.0
10/27/2025	JL	Participate in a call with A. Panda, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	JL	Perform research and analysis for inclusion in business plan/ projections report	2.2
10/27/2025	KBM	Review business plan updates	0.6
10/27/2025	LL	Assessed assumptions underlying rideshare adoption ramp; compared utilization rates forecast vs. actuals for 2025 Q1 and Q2.	2.7

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10/27/2025	LL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	LL	Review management analysis of transportation provider mix-shift; modeled financial impact of incremental Uber/Lyft penetration on cost-per-trip and gross margin.	2.0
10/27/2025	LL	Updated analysis, models and reports to account for revised total labor burden rate as supplied by Debtor and determine revised cost improvement opportunities.	3.0
10/27/2025	SC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	SC	Research employee compensation benchmarks and precedent in Chapter 11 companies.	2.1
10/27/2025	SC	Revise content for G&A workstream as part of business plan work	2.9
10/28/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.9
10/28/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.5
10/28/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.6
10/28/2025	AP	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.6
10/28/2025	CC	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	IN	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	JL	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	LL	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	LL	Prepare scenario model quantifying savings from transportation provider mix-shift under varying trip volumes and savings per trip estimates; summarized implications for base-case EBITDA.	2.5
10/28/2025	LL	Research Medicaid reimbursement rates and trends (2025-2028) for non-medical personal care services in CT, FL, MA, NJ, NY, PA and WV.	2.5
10/28/2025	LL	Review management's segment updates to evaluate service-level implications of increased Uber/Lyft usage; coordinated with operations SME.	2.7
10/28/2025	SC	Develop materials for expert report for G&A as part of business plan workstream	2.4
10/28/2025	SC	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	SC	Research precedent on instances of companies changing employee comp while under Chapter 11	2.7
10/28/2025	SC	Revise content based on updated information from Debtor for business plan workstream	0.8

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10/28/2025	SC	Update labor model on new information provided by Debtor for business plan workstream	1.8
10/28/2025	TGP	Analyze the Debtors' business plan projections under various cost assumptions	1.4
10/28/2025	TGP	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/29/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.8
10/29/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.7
10/29/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/29/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	AP	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
10/29/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	GM	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	IN	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	JL	Follow up on outstanding items for business plan report and incorporate	1.8
10/29/2025	JL	Participate in a call with G. Magrisi, A. Panda, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	LL	Create model to compare PCS reimbursement rates according to Debtor's forecast, historical performance and market trends.	2.5
10/29/2025	LL	Draft memo summarizing organizational-design recommendations and quantified savings for inclusion in business-plan diligence report.	2.8
10/29/2025	LL	Integrate service expense initiatives into unified business-plan financial model; ensured consistency of savings phasing and one-time costs.ore sending to W&C for review.	2.2
10/29/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	LL	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	SC	Review content to ensure all values tie and align to updated information from Debtor for business plan workstream	2.2
10/29/2025	SC	Revise content based on updated information from Debtor for business plan workstream	2.9

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10/29/2025	SC	Update content based on new information from Debtor for business plan workstream	2.7
10/29/2025	TGP	Analyze the Debtors' business plan projections under various revenue assumptions	1.1
10/29/2025	TGP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/30/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.2
10/30/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.2
10/30/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/30/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
10/30/2025	CC	Revise financial model to reflect business plan adjustments	1.4
10/30/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	GM	Review Business Plan and CapEx analysis and materials	1.0
10/30/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	JA	Review business plan evaluation materials and reconcile scenarios to Company plan	1.0
10/30/2025	JL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	SC	Prepare back-up materials, re: G&A labor model and savings	2.6
10/30/2025	SC	Review content for expert report for business plan workstream	2.3
10/30/2025	TGP	Analyze the Debtors' business plan projections under various cost assumptions	1.8
10/31/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.7
10/31/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/31/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/31/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.1
10/31/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	GM	Review Business Plan and CapEx analysis and materials	1.0
10/31/2025	GM	Participate in a call with G. Magrisi, J. Lee (AlixPartners) re: edits to valuation reports	0.1

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10/31/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	IN	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	JA	Provide comments on business plan expert report	0.8
10/31/2025	JL	Participate in a call with G. Magrisi, J. Lee (AlixPartners) re: edits to valuation reports	0.1
10/31/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	JL	Research and analysis on revenue items for business plan	1.5
10/31/2025	JL	Provide edits on business plan expert report	1.6
10/31/2025	KBM	Review updates related to draft business plan report	0.6
10/31/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	RK	Review business plan draft rebuttal report.	2.0
10/31/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	SC	Revise content for expert report for business plan workstream	1.6
10/31/2025	TGP	Analyze the Debtors' business plan projections under various revenue assumptions	1.2
10/31/2025	TGP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
Total Professional Hours			**803.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.9	$	7,154.00
Kathryn B McGlynn	$1,415	1.2		1,698.00
Greg Magrisi	$1,250	24.1		30,125.00
Jerry Wang	$1,225	9.0		11,025.00
Johnny Lee	$1,225	45.0		55,125.00
Ashutosh Panda	$1,150	190.1		218,615.00
Joel Amico	$1,150	4.5		5,175.00
Iain Nelson	$1,120	41.7		46,704.00
Matthew D Gates	$1,120	0.9		1,008.00
Ryan Komendowski	$1,080	5.6		6,048.00
Matthew Root	$1,000	0.7		700.00
Thomas G Prince	$950	50.3		47,785.00
Christopher Cuomo	$910	45.5		41,405.00
Susan Clark	$910	207.3		188,643.00
Chase Hood	$850	1.1		935.00
Lucas Lovatto	$835	156.2		130,427.00
Francisco Carafi	$445	15.5		6,897.50
Total Professional Hours and Fees		**803.6**	**$**	**799,469.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	TGP	Analyze FTI's proposed retention	0.9
10/01/2025	TGP	Analyze Moelis' proposed retention	1.4
10/02/2025	TGP	Analyze FTI's proposed retention	0.4
10/02/2025	TGP	Analyze Moelis' proposed retention	0.7
10/06/2025	KBM	Review FTI retention application	0.6
10/06/2025	KBM	Review Moelis retention application	0.6
10/06/2025	KBM	Revise FTI and Moelis fee analysis	0.9
10/22/2025	KBM	Review information related to MIP analysis	0.3
Total Professional Hours			**5.8**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	2.4	$	3,396.00
Thomas G Prince	$950	3.4		3,230.00
Total Professional Hours and Fees		**5.8**	**$**	**6,626.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Provide comments on W&C declaration	0.8
10/01/2025	JA	Review various data room files and provide summary overview	0.8
10/01/2025	MDG	Set up analysis of unencumbered assets	2.0
10/01/2025	TGP	Analyze the Debtors' historical financials	1.8
10/01/2025	TGP	Analyze the Debtors' scheduled assets	2.1
10/02/2025	DM	Review ModivCare accounting practices	0.5
10/02/2025	JA	Analyze various financial information and DIP budget expenses	0.9
10/02/2025	JA	Review historical financial data and related cash flow and business plan detail	1.0
10/02/2025	JA	Review revised due diligence list and updated files in data room	0.7
10/02/2025	MDG	Review updates to diligence request list	2.4
10/03/2025	CH	Review new items uploaded to virtual data room	1.2
10/03/2025	CH	Review settlement with United Healthcare	0.5
10/03/2025	JA	Review debtors settlement proposal	0.3
10/03/2025	JA	Review various data room documents re prep for upcoming hearing and W&C requests	2.0
10/03/2025	MDG	Prepare analysis of unencumbered assets	2.0
10/03/2025	TGP	Analyze the Debtors' historical operations to draft descriptions for UCC presentation materials	2.3
10/03/2025	TGP	Analyze the Debtors' scheduled liabilities	2.1
10/04/2025	CC	Calculate trade spend and count analysis for J. Amico and D. MacGreevey (AlixPartners)	0.6
10/05/2025	CH	Correspondence with team re: document review and outstanding data requests	0.4
10/05/2025	CH	Review new production uploads for responsive documents	1.7
10/05/2025	MDG	Revise analysis of unencumbered assets	1.5
10/06/2025	JA	Analyze proposed creditor settlement and identify diligence requests	0.7
10/06/2025	JA	Review various documents produced from Debtors re up tier transaction and financial projections	1.4
10/06/2025	JA	Update to diligence tracker based on review of various data room files	0.8
10/06/2025	MDG	Review open items on diligence list	1.0
10/06/2025	TGP	Analyze documents provided through discovery	2.7
10/07/2025	JA	Provide comment on various W&C motions	0.8
10/07/2025	JA	Review court descriptions re diligence questions	1.2
10/07/2025	JA	Review diligence requests and update for revisions and materials received	1.5
10/07/2025	JA	Review vendor payment data and updated liquidity outlook	0.9
10/07/2025	MDG	Review docket for various debtor filings and determine response status	0.5
10/08/2025	JA	Analyze prepetition vendor payments	0.5
10/08/2025	JA	Review documents related to historical debtor transactions and develop diligence questions	1.5
10/08/2025	JA	Review historical financial information and developed view on unencumbered assets in response to W&C diligence	1.0
10/09/2025	CH	Review new documents uploaded to virtual dataroom related to prepetition sale process	1.3
10/09/2025	JA	Draft of various diligence questions and perform financial analysis re Q1 transactions	0.7

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JA	Review various documents produced per discovery re valuation and financial projections	1.3
10/09/2025	KBM	Review outstanding information requests and next steps	0.6
10/09/2025	MDG	Additional research for W&C team re: lien challenge questions	1.0
10/09/2025	MDG	Update diligence list	1.7
10/09/2025	MDG	Prepare for diligence call with FTI	0.5
10/09/2025	MDG	Review contracts in Datasite dataroom	1.0
10/10/2025	CC	Review 10-K for business background information	0.8
10/10/2025	JA	Analysis and provide comments on the waterfall and reconcile with Plan documents	1.3
10/10/2025	JA	Analyze year end liquidity and Q1 2026 working capital requirements	1.1
10/10/2025	JA	Review documents in data room and provided via production process; update diligence list	1.0
10/10/2025	JA	Review various ownership changes in Q1 2025 re uptier transaction	0.7
10/10/2025	JT	Prepare a workbook detailing ownership history of the company's debt	1.6
10/10/2025	MDG	Research bank accounts potentially under DACA for W&C	1.0
10/10/2025	MDG	Research contract summaries in business plan for W&C	1.0
10/13/2025	CH	Review latest relativity data production for responsive documents	1.3
10/13/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: Review NWC assumptions in the financial model	0.4
10/13/2025	JA	Draft of diligence questions for upcoming informal debtor interviews	1.0
10/13/2025	JA	Review various documents produced in Relativity	0.9
10/13/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: Review NWC assumptions in the financial model	0.4
10/13/2025	JT	Develop a calculation for the 1L make whole provision	1.4
10/13/2025	MDG	Research re: lien challenge workstream	1.0
10/13/2025	MDG	Review diligence request list and compare to information provided and outstanding	1.5
10/14/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: analysis of sources and uses detail	0.3
10/14/2025	JA	Prepare materials and diligence questions for informal Debtor interviews	1.2
10/14/2025	JA	Review historical diligence info re prior forecasts	0.5
10/14/2025	JA	Review open diligence request list and identify high priority request items	1.0
10/14/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: analysis of sources and uses detail	0.3
10/14/2025	JT	Develop an excel view of the liquidity bridge to the 8/20 DIP budget	0.8
10/15/2025	CH	Review C. Shandler declaration re: UCH settlement	0.3
10/15/2025	JA	Analyze Debtor's proposed settlement and provide comments	0.6
10/15/2025	JA	Analyze various cash and business plan model to determine risk and opportunities in estimated post effective date cash	1.3
10/15/2025	JA	Review background materials and draft of questions for upcoming Debtor interviews	1.2
10/15/2025	JA	Review business plan and valuation materials to determine follow up diligence questions	1.1
10/15/2025	JT	Develop diligence questions re: working capital changes in company projections	0.6

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/15/2025	JT	Revise NWC analysis workbook based on additional detail received from Moelis	1.3
10/15/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
10/15/2025	MDG	Prepare information re: lien challenge and send to W&C	0.5
10/16/2025	CH	Review new documents uploaded to virtual dataroom related to liquidation analysis and historical cash flow budgets	1.7
10/16/2025	JA	Draft of various diligence questions for upcoming Debtor interviews	0.9
10/16/2025	JT	Develop a bridge of cash balances per the Sources and Uses to the Company's 3-statement model	0.9
10/16/2025	JT	Develop a bridge of cash balances per the Sources and Uses to the DIP Budget	1.3
10/17/2025	JA	Analyze certain Plan definitions and recovery calculations	1.3
10/17/2025	JA	Model out of various liquidity and valuation scenarios	1.6
10/17/2025	JT	Correspondence with V. Diwanji (Moelis) re: NWC diligence questions	0.4
10/17/2025	MDG	Research re: lien challenges	0.7
10/20/2025	CH	Review documents uploaded to virtual data room re: projections support and prepetition transactions	1.6
10/20/2025	JA	Analyze recoveries and claims estimated under various scenarios	1.2
10/20/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: review of NWC projections	0.4
10/20/2025	JT	Analyze NWC projections from FY26-FY30 based on the company's 3-statement model	2.7
10/20/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: review of NWC projections	0.4
10/20/2025	KBM	Review updates related to open information requests	0.3
10/20/2025	MDG	Review due diligence list and request status	0.5
10/21/2025	CC	Format worksheet for management incentive plan precedent deals	0.3
10/21/2025	CC	Research management incentive plan precedent deals	2.8
10/21/2025	CC	Research plan values and payment structures re management incentive plan precedent deals	1.2
10/21/2025	JA	Analyze certain settlement offers and impact on general unsecured creditors class	0.8
10/21/2025	JA	Analyze various claims recovery scenarios	0.7
10/21/2025	KBM	Review updates to outstanding information requests	0.2
10/21/2025	MDG	Research information related to lien challenges	3.0
10/22/2025	CC	Research management incentive plan precedent deals re: form and structure of consideration	1.8
10/22/2025	JA	Analyze proposed Debtor settlement with counter party	0.5
10/22/2025	KBM	Review updates re: unencumbered assets analysis	0.2
10/22/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
10/22/2025	TGP	Research re: prepetition transactions	1.8
10/23/2025	JA	Review open diligence items relating to liquidity and cash at effective date	1.6
10/23/2025	TGP	Research re: prepetition transactions	1.9
10/24/2025	CH	Research re: fixed asset appraisals	0.7
10/24/2025	CH	Review documents uploaded to virtual data room re: transportation agreements	1.2
10/24/2025	JA	Provide supporting analysis to W&C re projections	1.2
10/24/2025	JA	Review open diligence requests and prioritize re business plan and valuation	1.0
10/24/2025	MDG	Research re: W&C objection support	2.0
10/27/2025	CH	Review draft objection to UHC settlement	0.4

AlixPartners

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Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	DM	Emails with R. Beil (W&C), J. Shapiro, D. Kiyosaki (FTI), M. Gates and J. Amico re: priority ModivCare diligence items	0.3
10/27/2025	JA	Analyze various diligence related to letters of credit	0.5
10/27/2025	JA	Review various business plan projections in 2025 and reconcile differences	1.6
10/27/2025	JA	Update to list of outstanding diligence questions	0.6
10/27/2025	JA	Prepare various diligence questions and responses per W&C request re upcoming hearing	0.5
10/27/2025	KBM	Review unencumbered analysis	0.4
10/27/2025	MDG	Revise and submit diligence requests	1.2
10/27/2025	MDG	Revise diligence list requests and submit to FTI	0.6
10/28/2025	DM	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	DM	Emails with attachments with J. Amico, J. Lee re: UHC contract negotiation practices	0.4
10/28/2025	JA	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	JA	Draft of open diligence request list; confirm updates in data room	1.0
10/28/2025	JA	Draft of updated workstream list for team call with proposed next steps and action items	0.5
10/28/2025	JL	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	KN	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.2
10/28/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
10/28/2025	MDG	Further research related to lien challenge data requests	0.7
10/28/2025	RK	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.2
10/29/2025	CH	Review prepetition insider payment detailed breakout	0.7
10/29/2025	JA	Develop new model to perform scenario analysis on potential recovery scenarios for unsecured creditors	0.7
10/29/2025	JA	Review various historical documents re financial projections and LC projections re deposition prep	1.4
10/29/2025	JA	Update to diligence request list for new items and analyze new data room documents	1.0
10/29/2025	MDG	Further research related to lien challenge	0.6
10/30/2025	JA	Analyze various historical cash forecast per counsel request	0.5
10/30/2025	JA	Draft of diligence questions for upcoming Debtor depositions	1.0
10/30/2025	JA	Prepare talking points and outline for upcoming Committee call	0.5
10/30/2025	JA	Review various data room documents re letters of credit and surety bonds	0.7
10/31/2025	JA	Analyze various recovery scenarios based on revising assumptions on valuation and consideration options	0.8
10/31/2025	JA	Draft of questions re upcoming debtor depositions	0.9
10/31/2025	MDG	Review September payment matrices	0.8
Total Professional Hours			**136.8**

AlixPartners

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Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Kevin Nystrom	$1,430	0.2		286.00
Kathryn B McGlynn	$1,415	1.7		2,405.50
Johnny Lee	$1,225	0.3		367.50
Joel Amico	$1,150	56.1		64,515.00
Matthew D Gates	$1,120	28.7		32,144.00
Ryan Komendowski	$1,080	0.2		216.00
John Tutty	$950	12.1		11,495.00
Thomas G Prince	$950	14.7		13,965.00
Christopher Cuomo	$910	7.5		6,825.00
Chase Hood	$850	13.0		11,050.00
Lisa Marie Bonito	$580	0.8		464.00
Total Professional Hours and Fees		**136.8**	**$**	**145,923.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	JA	Review certain debtor motions including ordinary course professionals and provide comments	0.4
10/03/2025	JL	Review UHC settlement agreement and analysis of run rate vs settlement	0.9
10/07/2025	MDG	Prepare analysis of ordinary course professionals motion	2.5
10/08/2025	JA	Review and diligence of OCP motion and other debtor related retention applications	1.1
10/08/2025	KBM	Review analysis of ordinary course professionals motion	0.7
10/08/2025	KBM	Review ordinary course professionals motion	0.6
10/09/2025	JA	Review various diligence requests related to OCP motion	0.5
10/09/2025	KBM	Review additional information related to ordinary course professionals	0.6
10/22/2025	JL	Research and review UnitedHealthcare settlement items	1.8
10/23/2025	JL	Prepare research/analysis on UHC relationship	1.3
10/27/2025	DM	Review UCC objection to proposed UHC 9019 settlement	0.3
10/28/2025	JA	Review various materials and provide support to W&C for upcoming UHC hearing	0.5
10/28/2025	JL	Provide counsel with requested information to support UHC objection and hearing	0.9
10/29/2025	DM	Review ModivCare Debtors' reply to UCC objection to proposed UHC 9019 settlement	0.3
10/29/2025	DM	Review statement of consenting creditors re: W&C retention application	0.3
Total Professional Hours			**12.7**

AlixPartners

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Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Johnny Lee	$1,225	4.9		6,002.50
Joel Amico	$1,150	2.5		2,875.00
Matthew D Gates	$1,120	2.5		2,800.00
Total Professional Hours and Fees		**12.7**	**$**	**15,680.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	RK	Review document production for valuation and investigation documents.	2.0
10/04/2025	RK	Analyze latest document production.	2.6
10/05/2025	RK	Analyze latest document production.	1.0
10/07/2025	CH	Review collateral review memo and exhibits prepared by W&C	0.9
10/07/2025	CR	Call with R. Komendowski, C. Rubel (AlixPartners) and C. West, A. Chase, L. Miranda, A. Hong (W&C) re: uptier transaction investigation.	0.5
10/07/2025	CR	Analyze public financial statements related to uptier transactions.	1.8
10/07/2025	RK	Call with R. Komendowski, C. Rubel (AlixPartners) and C. West, A. Chase, L. Miranda, A. Hong (W&C) re: uptier transaction investigation.	0.5
10/08/2025	CH	Analysis re: retention bonus payments	0.7
10/08/2025	CH	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	CR	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of documents related to uptiering transactions	0.7
10/08/2025	CR	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	CR	Review financial statements and other docs related to uptier transactions.	1.5
10/08/2025	JA	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	JT	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of documents related to uptiering transactions	0.7
10/08/2025	JT	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	JT	Review key documents identified by counsel connected to uptier transaction	2.8
10/08/2025	JT	Summarize the contents of key documents identified by counsel as part of uptier transaction review	2.6
10/08/2025	MDG	Research answers re: lien challenge questions	2.5
10/08/2025	RK	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	RK	Review production for historical solvency analysis.	2.8
10/08/2025	RK	Review production for uptier transaction investigation.	2.0
10/09/2025	CH	Analyze documents produced re: uptier transaction	1.8
10/09/2025	CH	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	CH	Research related to collateral review supporting documents	0.5
10/09/2025	CR	Call with A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of company debt transactions in 2025	0.4
10/09/2025	CR	Call with C. Rubel and J. Tutty (AlixPartners) re: review of incremental term loan and uptier agreements	0.5
10/09/2025	CR	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	CR	Analyze documents related to debt swap transactions in Q1.	2.1
10/09/2025	JA	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4

AlixPartners

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Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JT	Call with A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of company debt transactions in 2025	0.4
10/09/2025	JT	Call with C. Rubel and J. Tutty (AlixPartners) re: review of incremental term loan and uptier agreements	0.5
10/09/2025	JT	Create a slide to summarize the holders of second lien notes	0.7
10/09/2025	JT	Develop a summary of lien holder parties and balances held	1.1
10/09/2025	JT	Develop slides to explain the total uptier balance	0.8
10/09/2025	JT	Develop slides with excerpts from relevant agreements to explain the uptier transaction	2.9
10/09/2025	JT	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	JT	Review Company 8-K filings in 2025 that are related to debt transactions	0.8
10/10/2025	CR	Prepare flow of funds analysis related to debt swap transactions.	1.8
10/10/2025	CR	Meeting with L. Miranda and A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of 2025 debt uptier transaction	0.3
10/10/2025	JT	Meeting with L. Miranda and A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of 2025 debt uptier transaction	0.3
10/10/2025	JT	Refine slide deck on uptier transaction based on new information received from counsel	2.1
10/10/2025	JT	Refine the slide deck to explain the uptier transaction, incorporating key excerpts from relevant agreements	2.9
10/13/2025	CR	Prepare flow of funds analysis related to debt swap transactions in Q1.	1.7
10/13/2025	CR	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of supporting documents related to the uptier transaction	0.6
10/13/2025	CR	Review dataroom materials related to debt agreements.	1.8
10/13/2025	CR	Review uptier transaction slides.	1.3
10/13/2025	JT	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of supporting documents related to the uptier transaction	0.6
10/13/2025	JT	Perform searches for documents in Relativity to support the uptier transaction review	2.1
10/13/2025	JT	Review debt documents for detail on uptier transaction	1.6
10/14/2025	CR	Analyze pre-petition debt transactions.	1.8
10/15/2025	CR	Analyze pre petition debt transactions.	1.3
10/15/2025	CR	Call with A. Chase and L. Miranda (W&C), C. Rubel and J. Tutty (AlixPartners) re: review of fifth amendment to term loan agreement	0.3
10/15/2025	JT	Analyze debt issuance costs associated with the incremental term loan	0.8
10/15/2025	JT	Call with A. Chase and L. Miranda (W&C), C. Rubel and J. Tutty (AlixPartners) re: review of fifth amendment to term loan agreement	0.3
10/15/2025	JT	Correspondence w/ L. Miranda and A. Chase (W&C) re: uptier transaction	0.3
10/15/2025	JT	Review sources and uses workbook from the incremental term loan transaction	0.4
10/16/2025	CR	Analyze pre-petition debt transactions.	1.2
10/16/2025	JT	Refine notes from call with S. Kern (ModivCare)	0.5
10/17/2025	CH	Review counsel update re: lien investigation workstream	0.4
10/17/2025	CR	Analyze pre-petition debt swap transactions.	1.8

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Attn: Chad J. Shandler, Chief Transformation Officer
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Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	JT	Perform document searches re: the unsecured bondholders who participated in the exchange agreement as part of the uptier transaction	1.8
10/20/2025	CR	Analyze pre-petition debt swap transaction materials.	1.2
10/21/2025	JT	Review data from Bloomberg re: ownership changes in the company's debt	1.3
10/21/2025	JT	Review key documents identified by counsel re: uptier transaction	1.9
10/22/2025	CR	Review produced documents related to debt swap transactions.	1.0
10/22/2025	JT	Compared Bloomberg trading data to files provided by the company re: debt ownership as of March 31	0.7
10/23/2025	JT	Develop requests for the company re: uptier transaction	0.3
10/23/2025	JT	Refine presentation to summarize our understanding of the uptier transaction	0.7
10/23/2025	JT	Review key documents identified by counsel re: debt agreements entered into in 2025	2.7
10/23/2025	JT	Review responses from the company re: diligence questions on debt transactions in 2025	0.6
10/28/2025	JL	Attend deposition of C. Shandler related to UHC motion	1.2
10/28/2025	JL	Continue attendance remotely, deposition of C. Shandler related to UHC motion	1.1
10/29/2025	CR	Discussion with A. Chase, L. Miranda and C. West (W&C) re: complaint.	0.6
10/29/2025	JT	Draft follow up questions for the company re: 2025 debt transactions	0.8
10/29/2025	JT	Summarize documents identified by counsel re: uptier transaction review	2.4
10/30/2025	JT	Develop a matrix of the company's historical debt holders based on additional documents provided by the company	2.7
10/31/2025	JT	Analyze intercreditor agreement re: detail on the uptier transaction	1.8
Total Professional Hours			**90.2**

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PROFESSIONAL	RATE	HOURS		FEES
Christopher Rubel	$1,225	24.9	$	30,502.50
Johnny Lee	$1,225	2.3		2,817.50
Joel Amico	$1,150	0.7		805.00
Matthew D Gates	$1,120	2.5		2,800.00
Ryan Komendowski	$1,080	11.2		12,096.00
John Tutty	$950	43.6		41,420.00
Chase Hood	$850	5.0		4,250.00
Total Professional Hours and Fees		**90.2**	**$**	**94,691.00**

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Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	CH	Initial review of claims register received from Verita	1.7
10/07/2025	CH	Analyze filed claims to remove duplicative, amended, settled, and withdrawn claims from claim estimate	2.4
10/07/2025	CH	Call with T. Prince and C. Hood (AlixPartners) re: claims analysis	0.4
10/07/2025	KBM	Review information related to filed claims	0.6
10/07/2025	TGP	Call with T. Prince and C. Hood (AlixPartners) re: claims analysis	0.4
10/08/2025	CH	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/08/2025	CH	Continue to analyze filed claims to remove duplicative, amended, settled, and withdrawn claims from claim estimate	2.7
10/08/2025	CH	Continue to reconcile prepetition payment detail with scheduled and filed claims	1.8
10/08/2025	CH	Reconcile prepetition payment detail with scheduled and filed claims	2.1
10/08/2025	HO	Revise discrepancies between names in vendor payments list and claims list	3.6
10/08/2025	MDG	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/08/2025	TGP	Analyze the Debtors' claims register	0.8
10/08/2025	TGP	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/09/2025	MDG	Review claims register	0.7
10/10/2025	MDG	Input data into AlixPartners claims platform to analyze claims	0.5
10/10/2025	MDG	Review claims register file	1.0
10/13/2025	MDG	Analyze claims register	1.5
10/15/2025	CH	Analyze revised lease rejection claims analysis	0.3
10/16/2025	CH	Performed analysis of filed and scheduled claims	0.3
10/17/2025	MDG	Analyze claims data	1.8
10/20/2025	JA	Analyze general unsecured creditors claims estimate	0.8
10/20/2025	SL	Begin preparing the claims module for claim reconciliation process	1.7
10/20/2025	SL	Review of various filed claims	0.3
10/20/2025	SL	Review latest claims report and begin formatting for the claims module	1.6
10/20/2025	SL	Review latest entity level information and prepare updates to the claims module accordingly	1.3
10/21/2025	KBM	Review illustrative recovery analysis	0.4
10/21/2025	MDG	Analyze claims file and prepare summary reports	1.4
10/21/2025	MDG	Analyze claims register and prepare summary reports	0.2
10/21/2025	SL	Continue to prepare updates to the latest claims register to begin uploading to the module for the claims reconciliation process	1.8
10/21/2025	SL	Review claims agent categorization and update records accordingly	1.6
10/21/2025	SL	Review scheduled claim detail provided in the claims register and update claims module accordingly	1.3
10/22/2025	CH	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/22/2025	CH	Correspondence with claims agent re: claims register data	0.2
10/22/2025	JA	Analyze unsecured claims pool	0.5
10/22/2025	MDG	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2

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Re: Claims Analysis
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10/22/2025	SL	Begin review of scheduled claims trumped by filed and update the claims module accordingly	1.7
10/22/2025	SL	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/22/2025	SL	Review filed claim detail provided in the claims register and update the claims module accordingly	2.1
10/22/2025	TGP	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	CH	Analyze claims filings to remove duplicative, redundant and amended claims from estimated claims pool	2.8
10/23/2025	CH	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	CH	Continue to analyze claims filings to remove duplicative, redundant and amended claims from estimated claims pool	1.7
10/23/2025	JA	Analyze general unsecured creditors claims pool	1.0
10/23/2025	MDG	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	MDG	Review claim form images	2.0
10/23/2025	SL	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	SL	Continue to review latest updates on the claim register and ensure updates captured accordingly on the claims module	1.3
10/23/2025	SL	Prepare report of filed and schedule claim comparison for further review and validation	0.9
10/23/2025	SL	Prepare report of filed and schedule claim comparison for further review and validation	1.8
10/24/2025	CH	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/24/2025	CH	Draft claims reconciliation analysis re: duplicative, amended and redundant claims	2.4
10/24/2025	MDG	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/24/2025	SL	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/24/2025	SL	Continue to review latest claims register for duplicated, amended and redundant claims	1.9
10/24/2025	SL	Prepare filed claims report for review for duplication, amendments and redundant claims	2.1
10/27/2025	CH	Analyze claims register to match filed and scheduled claims for estimated claims pool	2.4
10/27/2025	CH	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2
10/27/2025	CH	Continue to analyze claims register to match filed and scheduled claims for estimated claims pool	2.1
10/27/2025	MDG	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2
10/27/2025	SL	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2

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Re: Claims Analysis
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	SL	Continue to review latest review of filed claims for potential duplication and update tracker accordingly	1.8
10/27/2025	SL	Finalize review of filed claim duplication/amendment feedback, and prepare updates to the claims report accordingly	1.4
10/28/2025	CH	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	DM	Review ModivCare Debtors' high level general unsecured creditors claims analysis	0.4
10/28/2025	JA	Review Debtor claims analysis and reconcile against filed claims data	1.1
10/28/2025	MDG	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	MDG	Review claims forms	1.5
10/28/2025	SL	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	SL	Continue to finalize updates to the latest scheduled vs. filed claim detail and ensure updates are captured accordingly in latest reports	1.5
10/28/2025	SL	Finalize updates to the schedule claim detail on the claims module and ensure reports reflect updates accordingly	1.4
10/28/2025	SL	Review latest input provided on the claims module and ensure updates are reflected accordingly in latest reports	1.7
10/28/2025	TGP	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/29/2025	CH	Analyze illustrative general unsecured claims analysis and related assumptions prepared by FTI	0.9
10/29/2025	CH	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	CH	Draft analysis re: estimated scheduled and filed administrative claims	0.6
10/29/2025	CH	Draft analysis re: estimated scheduled and filed general unsecured claims and claims by type	1.7
10/29/2025	CH	Draft analysis re: estimated scheduled and filed priority claims	0.5
10/29/2025	CH	Draft analysis re: estimated scheduled and filed secured claims	0.7
10/29/2025	CH	Draft illustrative general unsecured claims estimate	1.2
10/29/2025	KBM	Review UHC settlement agreement	0.9
10/29/2025	KBM	Review updated unsecured recovery analysis	0.6
10/29/2025	MDG	Analyze filed claims	0.1
10/29/2025	MDG	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	MDG	Review claims and selected claim forms	1.8
10/29/2025	SL	Begin preparing updated claim summary reporting package for upcoming claims presentation	1.4
10/29/2025	SL	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	TGP	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/30/2025	CH	Review individual claims filings for further detail in support of claims analysis	2.7

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Re: Claims Analysis
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/30/2025	KBM	Review objection to UHC settlement	0.7
10/30/2025	KBM	Review updates re: UHC settlement approval	0.4
10/30/2025	MDG	Review claims presentation and selected claims	2.4
10/30/2025	SL	Continue to finalize updates to the claim summary report and ensure latest feedback incorporated into claims presentation	2.2
10/30/2025	SL	Continue to finalize updates to the latest scheduled vs. filed claim detail and ensure updates are captured accordingly in latest reports	1.4
10/30/2025	SL	Finalize remaining claim updates in the claims module and update claims presentation with final changes for review and sign-off	1.7
10/31/2025	CH	Analysis re: lease rejection claims	0.9
10/31/2025	CH	Draft updates to claims analysis to incorporate comments from M. Gates (AlixPartners)	1.2
10/31/2025	CH	Review schedule of assumed executory contracts and leases and related cure costs	0.7
10/31/2025	MDG	Correspondence with D. MacGreevey (AlixPartners) re: claims	0.2
10/31/2025	MDG	Review claims presentation and provide comments	1.6
Total Professional Hours			**104.8**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.4	$	584.00
Kathryn B McGlynn	$1,415	3.6		5,094.00
Joel Amico	$1,150	3.4		3,910.00
Matthew D Gates	$1,120	18.3		20,496.00
Sam Lemack	$980	37.3		36,554.00
Thomas G Prince	$950	2.2		2,090.00
Chase Hood	$850	36.0		30,600.00
Hugh Olohan	$535	3.6		1,926.00
Total Professional Hours and Fees		**104.8**	**$**	**101,254.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JM	Draft valuation report.	2.4
10/01/2025	JM	Review ModivCare earnings call transcripts.	2.7
10/01/2025	MR	Perform analysis of valuation materials in the ModivCare Disclosure Statement.	0.4
10/01/2025	RK	Review documents produced for valuation analysis.	2.0
10/02/2025	JM	Draft valuation report.	3.0
10/02/2025	JM	Research NEMT industry.	2.4
10/02/2025	JM	Review ModivCare investor presentations.	2.8
10/02/2025	MR	Perform analysis of segment-level financial data for ModivCare valuation analysis.	2.3
10/02/2025	RK	Review historical board minutes produced for EBITDA adjustments.	2.9
10/03/2025	JM	Draft valuation report.	2.4
10/03/2025	JM	Research personal care industry.	2.6
10/03/2025	JM	Review uptier transaction.	2.3
10/03/2025	MB	Conduct valuation analysis	2.1
10/03/2025	MR	Prepare draft presentation for ModivCare valuation.	1.2
10/05/2025	MR	Analyze valuation calculations in Moelis Illustrative Alternate Transaction Scenario Analysis document.	0.8
10/06/2025	JM	Respond to review comments on valuation report.	2.2
10/06/2025	JM	Review dataroom for information on National MedTrans transaction.	1.5
10/06/2025	JM	Review earnings calls transcripts for guideline companies.	2.6
10/06/2025	MB	Review valuation data	0.7
10/06/2025	MR	Review diligence tracker and responses for ModivCare valuation materials.	0.8
10/06/2025	RK	Analyze latest document production for historical solvency review.	1.4
10/06/2025	RK	Review January projections for historical solvency review.	2.1
10/07/2025	JA	Review various Debtor provided materials related to q1 transactions	1.0
10/07/2025	JM	Respond to review comments on valuation report.	1.6
10/07/2025	JM	Searched dataroom for results of Deutsche Bank sales process.	2.4
10/07/2025	MB	Review ModivCare financial documents	0.9
10/07/2025	MR	Prepare analysis of ModivCare guideline company multiples over time.	1.3
10/07/2025	MR	Prepare draft presentation for ModivCare valuation.	2.7
10/07/2025	RK	Analyze latest document production for historical solvency review.	1.7
10/07/2025	RK	Review discount rate inputs for valuation analysis.	2.4
10/07/2025	RK	Review the disclosure statement for waterfall analysis.	1.8
10/08/2025	CR	Analyze solvency implications of first quarter debt swap transactions.	1.3
10/08/2025	CR	Draft valuation expert report.	1.4
10/08/2025	JM	Update precedent transaction analysis.	2.6
10/08/2025	JM	Update valuation analysis.	3.0
10/08/2025	MR	Perform analysis of ModivCare financial metrics for valuation analysis.	1.7
10/08/2025	RK	Document review and analysis for valuation workstreams.	3.0
10/08/2025	RK	Prepare historical solvency review.	1.4
10/09/2025	CH	Analysis re: amended plan recovery mechanics	0.7
10/09/2025	CR	Assessed solvency in connection with pre petition debt swap transactions.	0.9
10/09/2025	JM	Analyze comparable company bond prices.	1.4
10/09/2025	JM	Review dataroom for information on Matrix transaction.	2.7
10/09/2025	MR	Perform guideline company analysis for draft ModivCare valuation.	1.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	RK	Prepare company valuation analysis.	2.2
10/09/2025	RK	Review document production for business plan assumption support.	1.9
10/09/2025	RK	Review public transaction multiples for valuation analysis.	2.6
10/10/2025	CH	Draft analysis re: recovery hurdle amounts	0.8
10/10/2025	CH	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	CC	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: alignment on valuation methodology	0.3
10/10/2025	CR	Assessed solvency in connection with debt swap transactions.	1.9
10/10/2025	CR	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	DM	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JA	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JT	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JM	Update valuation report.	2.7
10/10/2025	MB	Review ModivCare financial data	1.2
10/10/2025	MR	Prepare draft presentation for ModivCare valuation.	2.6
10/10/2025	MR	Review guideline company filings and analyst reports for ModivCare valuation analysis.	0.9
10/10/2025	RK	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	RK	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: alignment on valuation methodology	0.3
10/10/2025	RK	Prepare valuation analyses for multiple periods in 2025.	3.0
10/10/2025	RK	Review documents produced for historical solvency analysis.	2.4
10/12/2025	MR	Review valuation analysis in Moelis discussion materials.	0.6
10/12/2025	RK	Review the Moelis valuation analysis.	2.0
10/13/2025	CH	Analyze valuation materials prepared by Moelis	1.8
10/13/2025	CR	Draft valuation report slides.	1.3
10/13/2025	CR	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	JA	Review Debtors valuation analysis	1.0
10/13/2025	JT	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	JM	Review Moelis valuation report.	2.0

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Re: Valuation and Solvency Analysis
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/13/2025	MR	Analyze guideline company valuation multiples over time for ModivCare valuation.	2.9
10/13/2025	MR	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report.	1.0
10/13/2025	MR	Perform research re: guideline company segment data for ModivCare valuation.	0.8
10/13/2025	MR	Perform research re: ModivCare NEMT segment for valuation analysis.	1.9
10/13/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	2.1
10/13/2025	RK	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	RK	Analyzed Moelis valuation report for rebuttal	2.0
10/13/2025	RK	Prepare uptier solvency analysis.	1.8
10/14/2025	CR	Analyze balance sheet solvency in connection with pre petition debt swap transactions.	1.8
10/14/2025	CR	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/14/2025	CR	Review market trading data.	1.2
10/14/2025	JT	Analyze comparable transactions identified by the company to support its valuation	2.1
10/14/2025	JT	Call with R. Komendowski and J. Tutty (AlixPartners) re: review of comparable transactions for company valuation	0.5
10/14/2025	JT	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/14/2025	JT	Develop slides in valuation presentation re: comparable transactions	1.6
10/14/2025	JT	Research additional comparable companies as part of the valuation developed by the UCC	1.1
10/14/2025	RK	Call with R. Komendowski and J. Tutty (AlixPartners) re: review of comparable transactions for company valuation	0.5
10/14/2025	RK	Review plan updated plan documentation for valuation analysis updates.	1.3
10/14/2025	RK	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/15/2025	CR	Prepare valuation analysis related to proposed plan negotiations.	2.1
10/15/2025	CR	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	JA	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	JT	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	JT	Refine analysis of comparable transactions to support UCC company valuation	1.7
10/15/2025	JT	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	MB	Review ModivCare valuation	0.9
10/15/2025	MB	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	MR	Perform quality review of cost of capital analysis for ModivCare valuation.	2.0
10/15/2025	MR	Perform reconciliation of Moelis valuation analysis.	2.8

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/15/2025	MR	Review cost of debt benchmarks for ModivCare cost of capital analysis.	0.9
10/15/2025	MR	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation.	1.3
10/15/2025	RK	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	RK	Review company business plan for NWC assumptions.	2.2
10/15/2025	RK	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/16/2025	CR	Review valuation slide deck.	0.8
10/16/2025	JT	Review available documents for historical actual and projected EBITDA results by business segment	1.6
10/16/2025	JT	Summarize historical actual and projected EBITDA results by business segment based on documents and SEC filings reviewed	1.4
10/16/2025	MR	Analyze discounted cash flow analysis in Moelis valuation materials.	2.0
10/16/2025	MR	Perform guideline transaction approach for ModivCare valuation.	2.5
10/16/2025	MR	Prepare valuation sensitivity analysis for Moelis cost of capital.	2.8
10/16/2025	MR	Reconcile Moelis cost of capital data against available market data.	1.8
10/16/2025	RK	Prepare valuation questions for Company interviews.	3.0
10/16/2025	RK	Review documents provided by Company for valuation and solvency analysis.	1.5
10/17/2025	AP	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CH	Review expert report of Z. Jamal	1.4
10/17/2025	CC	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CR	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	JA	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	JT	Refine analysis of changes to the company's EBITDA projections by business segment over time	1.1
10/17/2025	JT	Review available documents for historical and future projected Capital Expenditures	1.9
10/17/2025	JT	Review detail on company Letters of Credit	0.7
10/17/2025	JT	Review presentation on company valuation prepared by Moelis	0.5
10/17/2025	JT	Summarize the company's prior actual and projected liquidity balances from available documents	0.8
10/17/2025	JL	Participate in a call with R. Komendowski, J. Amico, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	LL	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	MB	Review valuation data	0.7
10/17/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	MR	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	MR	Perform quality review of ModivCare valuation model.	1.6
10/17/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	MR	Research re: market debt yields for ModivCare valuation analysis.	0.8
10/17/2025	RK	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	RK	Prepare valuation scenario analysis for settlement meeting.	2.1
10/17/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	SC	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/18/2025	MR	Perform research re: transportation guideline companies in Moelis valuation materials.	1.3
10/19/2025	DM	Review settlement deck and provide edits	0.2
10/19/2025	JA	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	JT	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	KBM	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	MDG	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	MR	Analyze impact of equity rights offering in Moelis valuation materials.	2.6
10/19/2025	MR	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement.	0.2
10/19/2025	MR	Perform quality review of updated ModivCare valuation analysis.	1.1
10/19/2025	RK	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/19/2025	RK	Prepare valuation analysis for upcoming committee meetings.	2.0
10/20/2025	CH	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	CH	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	CH	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	CH	Draft hurdle analysis and demonstrative for settlement discussion materials	1.3
10/20/2025	CH	Draft updates to W&C settlement materials	0.9
10/20/2025	CH	Review draft settlement discussion materials	1.1
10/20/2025	CR	Analyze comparable companies based on business plan and Moelis valuation.	2.3
10/20/2025	CR	Analyze Moelis valuation materials.	1.5
10/20/2025	JA	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	JA	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	JA	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	JT	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	JT	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	JT	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	MB	Review and provide comments on current valuation report	0.6
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation.	0.4
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation.	0.3
10/20/2025	MR	Review supporting documents provided by Moelis re: ModivCare valuation analysis.	1.7
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	RK	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	RK	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	RK	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	RK	Prepare company valuation adjustments for settlement meeting discussion.	2.6
10/20/2025	RK	Prepare settlement analysis for meeting.	1.6
10/20/2025	RK	Update recovery waterfall analysis for updated distributable value assumptions.	2.0
10/20/2025	TGP	Analyze expert report of Z. Jamal	1.4
10/21/2025	CH	Analyze Moelis illustrative recovery analysis and related assumptions	0.5
10/21/2025	CH	Draft updates to settlement materials	0.8
10/21/2025	CR	Analyze Moelis valuation materials.	1.7
10/21/2025	CR	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	DM	Analyze Z. Jamal (Moelis) expert report re: ModivCare Plan valuation	1.2
10/21/2025	DM	Review Debtors projections over time in 2025	0.9
10/21/2025	JA	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/21/2025	JT	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/21/2025	MR	Analyze market data in Moelis valuation materials.	0.8
10/21/2025	RK	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/22/2025	CR	Analyze settlement offer economics.	1.5
10/22/2025	CR	Draft and reviewed valuation expert report.	1.5
10/22/2025	JT	Review waterfall in valuation model for alignment with latest settlement offer	1.1
10/22/2025	JT	Revise calculation for general unsecured creditors pool based on latest available information	0.7
10/22/2025	JT	Revise valuation model based on the latest settlement discussions	0.8
10/22/2025	MB	Review data for valuation analysis	0.8
10/22/2025	MR	Perform analysis of betas in Moelis valuation materials.	1.1
10/23/2025	CH	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	CR	Review market research materials related to plan valuation.	1.8
10/23/2025	CR	Review valuation expert report.	1.5
10/23/2025	JA	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	JT	Analyze statement of cash flows included in the company's 3-statement model from FY26-FY30	1.4
10/23/2025	MB	Conduct valuation analysis	1.1
10/23/2025	MDG	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	MR	Prepare presentation materials for ModivCare valuation.	2.6
10/23/2025	RK	Call with V. Sachdev (W&C) re: valuation waterfall implications.	0.3

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	RK	Review business plan analysis for valuation impacts.	2.0
10/24/2025	CH	Review equity rights offering valuation support provided by Moelis	0.4
10/24/2025	CR	Review sec. 552 valuation cases per counsel request.	1.3
10/24/2025	CR	Review valuation expert report deck.	1.7
10/24/2025	MB	Conduct valuation analysis	0.8
10/24/2025	MR	Perform research re: guideline transaction method for ModivCare valuation analysis.	2.5
10/24/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	1.5
10/24/2025	RK	Implement business plan adjustments into the valuation analysis.	1.9
10/24/2025	RK	Investigation into Moelis option valuation methodology.	2.6
10/25/2025	RK	Prepare draft expert rebuttal valuation report.	2.9
10/25/2025	RK	Review expert rebuttal report guideline company selection analysis.	0.9
10/26/2025	MR	Perform research re: precedent transactions analysis for ModivCare valuation.	2.1
10/27/2025	CR	Draft valuation expert report.	1.2
10/27/2025	CR	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	CR	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/27/2025	DM	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	JA	Review Debtors and Alix's valuation analyses and reconcile differences	1.1
10/27/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	MB	Conduct valuation analysis	1.2
10/27/2025	MB	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	MR	Perform research re: precedent transactions analysis for ModivCare valuation.	2.8
10/27/2025	MR	Perform research re: selected publicly traded companies for ModivCare valuation.	0.8
10/27/2025	MR	Update ModivCare valuation slides in draft expert report.	2.3
10/27/2025	MR	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/27/2025	RK	Prepare the draft expert rebuttal valuation report.	2.6
10/27/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	RK	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/28/2025	CH	Review latest proposal received from ad hoc group	0.4
10/28/2025	CR	Analyze valuation indicia in connection with first quarter financing transactions.	1.8
10/28/2025	JL	Review business valuation analysis and report	1.1
10/28/2025	MB	Review valuation analysis	2.8
10/28/2025	MR	Analyze beta for selected publicly traded companies for ModivCare valuation.	1.6
10/28/2025	MR	Perform analysis of historical ModivCare market data for valuation analysis.	2.7
10/28/2025	RK	Prepare the draft expert rebuttal valuation report.	2.6
10/28/2025	RK	Review the Zul Jamal expert valuation report.	2.2

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10/29/2025	CR	Review and provide comments on valuation expert report.	1.9
10/29/2025	JA	Review and provide comments on current draft of valuation report	0.7
10/29/2025	JL	Participate in discussion with M. Brown, J. Lee (AlixPartners) re: valuation report matters	0.5
10/29/2025	MB	Participate in discussion with M. Brown, J. Lee (AlixPartners) re: valuation report matters	0.5
10/29/2025	MB	Review business plan analysis	1.1
10/29/2025	MB	Review valuation analysis	1.9
10/29/2025	MR	Analyze ModivCare cost of capital for valuation analysis.	2.9
10/29/2025	MR	Update ModivCare discounted cash flow analysis to reflect revised business plan.	2.5
10/29/2025	MR	Update ModivCare valuation analysis in draft expert report.	1.4
10/29/2025	RK	Incorporation of adjusted business plan impact on valuation rebuttal.	2.6
10/29/2025	RK	Prepare the draft expert rebuttal valuation report.	2.3
10/29/2025	RK	Review the Zul Jamal expert valuation report.	1.1
10/30/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	JT	Call with M. Root and J. Tutty (AlixPartners) re: pricing of comparable debt instruments	0.4
10/30/2025	JT	Call with R. Komendowski and J. Tutty (AlixPartners) re: historical trading data of the company's debt	0.4
10/30/2025	JT	Review data on Bloomberg re: historical pricing and volume of the company's debt	1.7
10/30/2025	JT	Summarize data from Bloomberg re: historical debt pricing of comparable companies	1.4
10/30/2025	MB	Conduct valuation analysis	1.6
10/30/2025	MB	Review draft valuation report	1.8
10/30/2025	MB	Review valuation research	0.7
10/30/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	MR	Call with M. Root and J. Tutty (AlixPartners) re: pricing of comparable debt instruments	0.4
10/30/2025	MR	Perform analysis of debt securities for ModivCare valuation analysis.	1.9
10/30/2025	MR	Prepare ModivCare valuation materials for draft expert report.	1.6
10/30/2025	MR	Review EY valuation materials for ModivCare.	1.1
10/30/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	RK	Call with R. Komendowski and J. Tutty (AlixPartners) re: historical trading data of the company's debt	0.4
10/30/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	TGP	Analyze the Debtors' valuation analysis	1.7
10/31/2025	DM	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	DM	Review and provide comments on draft Brown ModivCare valuation report	3.7

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/31/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
10/31/2025	JA	Review valuation analysis and provide comments	0.5
10/31/2025	JA	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	JT	Analyze FY26 net working capital projections based on additional detail provided by FTI	2.3
10/31/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
10/31/2025	JT	Correspond with J. Baltaytis (FTI) re: Operating Net Working Capital in FY26	0.4
10/31/2025	JT	Review the expert valuation report	0.3
10/31/2025	KBM	Review updates related to valuation report	0.6
10/31/2025	MB	Review valuation analysis	1.6
10/31/2025	MR	Perform analysis of market data for ModivCare valuation analysis.	0.9
10/31/2025	MR	Perform quality review of discounted cash flow analysis for ModivCare valuation.	2.0
10/31/2025	MR	Perform quality review of precedent transaction analysis for ModivCare valuation.	2.7
10/31/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	2.0
10/31/2025	RK	Finalize draft rebuttal report for valuation analysis.	2.5
10/31/2025	RK	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
Total Professional Hours			**383.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	7.4	$	10,804.00
Kathryn B McGlynn	$1,415	0.8		1,132.00
Marc Brown	$1,415	27.5		38,912.50
Christopher Rubel	$1,225	41.5		50,837.50
Johnny Lee	$1,225	2.8		3,430.00
Ashutosh Panda	$1,150	1.2		1,380.00
Joel Amico	$1,150	10.6		12,190.00
Matthew D Gates	$1,120	0.4		448.00
Ryan Komendowski	$1,080	96.2		103,896.00
Matthew Root	$1,000	97.8		97,800.00
John Tutty	$950	33.0		31,350.00
Thomas G Prince	$950	3.1		2,945.00
Christopher Cuomo	$910	1.5		1,365.00
Jyoji Morimoto	$910	45.3		41,223.00
Susan Clark	$910	1.2		1,092.00
Chase Hood	$850	12.1		10,285.00
Lucas Lovatto	$835	1.2		1,002.00
Total Professional Hours and Fees		**383.6**	**$**	**410,092.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	CH	Review draft disclosure statement objection	1.1
10/01/2025	JA	Provide comments to Disclosure Statement	1.2
10/01/2025	KBM	Review analyses re: disclosure statement objection	0.7
10/01/2025	KBM	Review updates re: disclosure statement objection	0.6
10/01/2025	MDG	Draft of follow up diligence items re: ERO	0.6
10/01/2025	MDG	Correspondence with W&C re: ERO	0.3
10/01/2025	MDG	Review equity rights offering calculations for disclosure statement objection	1.4
10/02/2025	KBM	Review disclosure statement objection	0.9
10/03/2025	CH	Review redline of amended plan of reorganization	0.6
10/05/2025	CH	Review summary from counsel re: amended plan and disclosure statement	0.5
10/06/2025	CH	Review Debtors' response to disclosure statement objection	0.4
10/13/2025	JA	Review Amended Disclosure Statement and Plan re recovery	0.5
10/20/2025	KBM	Review updated settlement discussion presentation	0.8
10/21/2025	CH	Analyze disclosure statements and confirmation orders for key terms re: comparable management incentive plans	2.7
10/21/2025	CH	Continue to analyze disclosure statements and confirmation orders for key terms re: comparable management incentive plans	2.3
10/21/2025	CH	Prepare management incentive plan comps template	0.8
10/21/2025	CH	Screen for potential management incentive plan comps	0.9
10/21/2025	KBM	Review changes to settlement discussion presentation	0.6
10/21/2025	KBM	Review updates to settlement discussion presentation	0.9
10/21/2025	TGP	Analyze the Debtors' proposed plan	1.3
10/22/2025	CH	Draft updates to management incentive plan comps analysis	1.6
10/22/2025	KBM	Review Debtors' presentation re: settlement negotiations	0.7
10/22/2025	KBM	Review final changes to settlement discussion presentation	0.6
Total Professional Hours			**22.0**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	5.8	$	8,207.00
Joel Amico	$1,150	1.7		1,955.00
Matthew D Gates	$1,120	2.3		2,576.00
Thomas G Prince	$950	1.3		1,235.00
Chase Hood	$850	10.9		9,265.00
Total Professional Hours and Fees		**22.0**	**$**	**23,238.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	CH	Attend second day DIP hearing (remotely)	0.5
10/03/2025	JA	Attend DIP hearing	0.5
10/03/2025	KBM	Attend second day DIP hearing (remotely)	0.5
10/03/2025	MDG	Attend second day DIP hearing (remotely)	0.5
10/06/2025	AP	Attend Disclosure Statement Hearing re: Debtor's DIP order and business plan projections	1.5
10/06/2025	CH	Attend Disclosure Statement hearing (remotely)	1.2
10/06/2025	JA	Attend Disclosure Statement hearing (remotely)	1.0
10/06/2025	KBM	Attend Disclosure Statement hearing (remotely)	1.2
10/06/2025	MDG	Attend Disclosure Statement hearing (remotely)	0.8
10/10/2025	AP	Attend Status Conference re: Debtor's DIP and Disclosure statement hearing	0.5
10/10/2025	CH	Attend ModivCare status conference (remotely)	0.5
10/10/2025	DM	Attend ModivCare status conference (remotely)	0.5
10/10/2025	KBM	Attend ModivCare status conference (remotely)	0.5
10/30/2025	CH	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	2.4
10/30/2025	DM	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely)	2.6
10/30/2025	JL	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	2.7
10/30/2025	KBM	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	1.0
Total Professional Hours			**18.4**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.1	$	4,526.00
Kathryn B McGlynn	$1,415	3.2		4,528.00
Johnny Lee	$1,225	2.7		3,307.50
Ashutosh Panda	$1,150	2.0		2,300.00
Joel Amico	$1,150	1.5		1,725.00
Matthew D Gates	$1,120	1.3		1,456.00
Chase Hood	$850	4.6		3,910.00
Total Professional Hours and Fees		**18.4**	**$**	**21,752.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Veri-Za	0.9
10/02/2025	BF	Revise draft AlixPartners' retention documents	0.6
10/02/2025	KSM	Review updated draft retention documents from G. Zahiremami (W&C)	0.6
10/03/2025	KSM	Correspondence with G. Zahiremami (W& C) and B. Filler (AlixPartners) re: finalizing retention documents	0.4
10/06/2025	BF	Revise draft retention documents	0.6
10/06/2025	DM	Review, revise and comment on draft ModivCare retention documents	1.0
10/06/2025	JB	Update draft disclosures to be included in retention documents in response to comments from K. Sundt McClarren (AlixPartners)	0.7
10/06/2025	KSM	Revise draft relationship disclosures	1.1
10/09/2025	BF	Draft investor solicitation emails re: disclosures	0.8
10/09/2025	BF	Prepare revised proposed retention order incorporating U.S. Trustee comments	0.4
10/09/2025	ESK	Emails to investors re: disclosures	1.0
10/09/2025	JB	Draft Firmwide document re. disclosures	2.8
10/09/2025	JB	Continue to draft Firmwide document re. disclosures	2.2
10/09/2025	KSM	Review comments from UST re: AlixPartners' retention application	0.5
10/10/2025	ESK	Review responses to disclosure emails	0.5
10/10/2025	JB	Continue to draft firmwide document re. disclosures	1.9
10/10/2025	JB	Draft supplemental disclosures to be included in First Declaration	0.7
10/14/2025	KSM	Revise firmwide email distribution re: potential additional relationship disclosures	1.3
10/15/2025	ESK	Review firmwide email re: disclosures	1.5
10/21/2025	ESK	Review investor disclosure response	0.5
10/21/2025	KSM	Address responses to firmwide correspondence re: potential relationship disclosures	0.4
10/28/2025	KSM	Revise draft supplemental declaration re: disclosures	0.3
10/29/2025	DM	Review draft first supplemental declaration iso ModivCare retention	0.3
10/29/2025	JB	Update draft supplemental disclosures to be included in First Declaration	0.3
Total Professional Hours			**21.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.3	$	1,898.00
Elizabeth S Kardos	$950	3.5		3,325.00
Kaitlyn Sundt McClarren	$715	4.6		3,289.00
Brooke Filler	$605	2.4		1,452.00
Jennifer Braverman	$565	9.5		5,367.50
Total Professional Hours and Fees		**21.3**	**$**	**15,331.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/12/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	0.8
10/13/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.0
10/13/2025	LMB	Review Interim Compensation Motion	0.2
10/15/2025	LMB	Continue to prepare professional fees for September 2025 Monthly Fee Statement	1.3
10/15/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	3.2
10/20/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	3.0
10/20/2025	MDG	Begin review September professional fees for privilege and confidentiality	1.5
10/21/2025	LMB	Prepare draft of initial First Monthly Fee Statement	0.7
10/21/2025	LMB	Prepare initial schedule/exhibit workbook for Monthly Fee Statements	1.0
10/23/2025	MDG	Review September professional fees for privilege and confidentiality	2.3
10/27/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	2.3
10/27/2025	MDG	Review September professional fees for privilege and confidentiality	1.0
10/28/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.2
10/28/2025	MDG	Analyze professional fees for September 2025 Monthly Fee Statement for privilege and confidentiality	1.0
10/29/2025	LMB	Analyze expenses for September 2025 Monthly Fee Statement	0.7
10/30/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.3
10/30/2025	LMB	Prepare schedule/exhibit workbook for September 2025 Monthly Fee Statement	1.2
10/30/2025	MDG	Analyze professional fees for September 2025 Monthly Fee Statement for privilege and confidentiality	0.8
Total Professional Hours			**24.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
Matthew D Gates	$1,120	6.6	$	7,392.00
Lisa Marie Bonito	$580	17.9		10,382.00
Total Professional Hours and Fees		**24.5**	**$**	**17,774.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CH	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	CC	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	JA	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	RK	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/10/2025	CH	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	DM	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	JA	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	RK	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/11/2025	RK	Prepare waterfall analysis.	2.1
10/12/2025	RK	Review waterfall analysis sensitivity to valuation analysis.	2.3
10/13/2025	RK	Review the Moelis plan waterfall analysis.	2.4
10/14/2025	RK	Prepare model plan waterfall assumption analysis.	2.3
10/14/2025	RK	Prepare waterfall scenario analysis for counsel.	2.8
10/15/2025	RK	Review business plan documentation for waterfall assumption updates.	1.8
10/16/2025	RK	Prepare valuation analysis waterfall impacts for settlement meeting.	2.9
10/17/2025	RK	Prepare waterfall scenario analysis for settlement meeting.	1.9
10/17/2025	RK	Review plan documentation for waterfall sensitivity analysis.	1.5
10/18/2025	RK	Prepare waterfall scenario analysis for settlement meeting.	1.2
10/19/2025	RK	Prepare waterfall analysis for upcoming committee meetings.	2.1
10/23/2025	RK	Review documents available for entity-level value allocation analysis.	2.2
10/27/2025	RK	Review warrant and ERO value impacts on the waterfall.	1.4
10/29/2025	RK	Review ERO valuation impacts.	1.1
10/30/2025	RK	Analyze plan dilution schedules and impact on distributable value among classes.	2.2
10/30/2025	RK	Review letter of credit impact on distributable value.	2.7
Total Professional Hours			**37.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.7	$	1,022.00
Joel Amico	$1,150	1.1		1,265.00
Ryan Komendowski	$1,080	34.0		36,720.00
Christopher Cuomo	$910	0.4		364.00
Chase Hood	$850	1.1		935.00
Total Professional Hours and Fees		**37.3**	**$**	**40,306.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	DM	Travel from Houston to New York, NY (return from ModivCare DIP hearing)	7.0
10/21/2025	RK	Travel from Chicago, IL to New York (to attend settlement discussions)	3.5
10/22/2025	RK	Travel from New York, NY to Chicago, IL (return from settlement discussions)	3.5
Total Professional Hours			**14.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	7.0	$	10,220.00
Ryan Komendowski	$1,080	7.0		7,560.00
Total Professional Hours and Fees		**14.0**	**$**	**17,780.00**
Less 50% Travel Fees				(8,890.00)
Total Professional Fees			**$**	**8,890.00**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
09/16/2025	S&P Research Reports	1,210.10
09/19/2025	S&P Research Reports – September 2025	150.00
09/22/2025	Industry Research - ModivCare	893.53
10/01/2025	Airfare David MacGreevey 2025-10-01 IAH- LGA	449.00
10/01/2025	S&P Research Reports – October 2025	320.00
10/01/2025	Taxi/Car Service David MacGreevey LGA airport to Home	307.35
10/01/2025	Taxi/Car Service David MacGreevey IAH airport to Hotel	143.45
10/20/2025	Airfare Ryan Komendowski 2025-10-21 ORD- LGA	382.96
10/21/2025	Airfare Joel Amico 2025-10-21 BUF- LGA	173.72
10/21/2025	Taxi/Car Service Joel Amico Home to Buffalo airport	11.33
10/21/2025	Taxi/Car Service Joel Amico Home to Buffalo airport	62.53
10/21/2025	Taxi/Car Service Joel Amico LGA to AlixPartners office	73.26
10/21/2025	Lodging Joel Amico - Westin New York Grand Central Station, New York, NY 2025-10-21 2025-10-23 (2 nights)	1,500.00
10/21/2025	Lodging Ryan Komendowski - The Benjamin Royal Sonest - New York, NY 2025-10-21 2025-10-23 (2 nights)	1,500.00
10/21/2025	Individual Meal - Joel Amico - Breakfast	3.58
10/21/2025	Individual Meal - Ryan Komendowski - Breakfast	8.72
10/21/2025	Individual Meal - Ryan Komendowski - Lunch	8.18
10/21/2025	Individual Meal - Ryan Komendowski - Dinner	75.00
10/22/2025	Parking/Tolls Ryan Komendowski	94.27
10/22/2025	Taxi/Car Service Ryan Komendowski LGA to Hotel	82.77
10/22/2025	Individual Meal - Joel Amico - Dinner	39.90
10/23/2025	Airfare Joel Amico 2025-10-24 LGA- BUF	208.71
10/23/2025	Taxi/Car Service Ryan Komendowski Hotel to LGA	127.73
10/23/2025	Individual Meal - Joel Amico - Dinner	16.06
10/24/2025	Taxi/Car Service Joel Amico Buffalo Airport to Home	70.72

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
10/24/2025	Taxi/Car Service Joel Amico Office to LGA	51.07
10/28/2025	Individual Meal - David MacGreevey - Lunch	18.23
10/31/2025	Client Research - US Home Care Services Market Outlook	2,000.00
10/31/2025	Client Research - US Remote Patient Monitoring Market Outlook	4,950.00
10/31/2025	Client Research - US Non-Emergency Medical Transportation Market to 2031	2,450.00
Total Expenses		**17,382.17**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20014495Pa0001

Expenses		**Amount**
Airfare	$	1,214.39
Client Research		11,973.63
Ground Transportation		1,024.48
Lodging		3,000.00
Meals		169.67
Total Expenses	**USD**	**17,382.17**

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

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

WHITE & CASE LLP'S THIRD MONTHLY FEE STATEMENT FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM NOVEMBER 1, 2025 TO AND INCLUDING NOVEMBER 30, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in the Cases:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	October 31, 2025 [Docket No. 616]	
	Beginning of Period	**End of Period**
Time period covered by this Statement:	November 1, 2025	November 30, 2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:		$3,683,445.60 (80% of $4,604,307.00)
Total reimbursable expenses requested in this Statement		$93,701.82
Total fees and expenses requested in this Statement (exclusive of 20% Holdback):		$3,777,147.42
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):		$4,698,008.82
Summary of Attorney Fees Requested[2]		
Total attorney fees requested in this Statement:		$4,539,256.00
Total actual attorney hours covered by this Statement:		3,176.0
Average hourly rate for attorneys:		$1,429
Summary of Paraprofessional Fees Requested[3]		
Total paraprofessional fees requested in this Statement:		$65,051.00

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

[2] Includes staff attorneys.

[3] May include individuals who are admitted to the bar.

Total actual paraprofessional hours covered by this Statement:	133.0
Average hourly rate for paraprofessionals:	$489

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* ("Compensation Procedures Order") [Docket No. 500], each Notice Party (as defined therein) receiving notice of the Monthly Statement will have until 4:00 p.m. (prevailing Central Time) 14 days after the filing of the Monthly Statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay White & Case an amount of 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement that are not objected to.

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, hereby files this monthly statement (this "Monthly Statement") for the period from November 1, 2025 to and including November 30, 2025 (the "Fee Period") requesting an aggregate amount of $3,777,147.42 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Committee in the amount of $3,683,445.60, representing 80% of the $4,604,307.00 of fees earned by White & Case for professional services to the Committee during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Fee Period in connection with such services in the amount of $93,701.82.

1. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by project category is attached here to as **Exhibit B.** A detailed statement of White & Case's hours expended and fees earned during the Fee Period is attached hereto as **Exhibit C**. A summary of White & Case's expenses incurred for which reimbursement is sought grouped by category is attached hereto as **Exhibit D**. A detailed statement of White & Case's expenses incurred for which reimbursement is sought is attached hereto as **Exhibit E**.

2. White & Case attorneys and paraprofessionals expended a total of 3,309.0 hours in connection with the chapter 11 cases during the Fee Period. All services rendered by White & Case for which compensation is sought pursuant to this Monthly Statement were rendered solely to or on behalf of the Committee. No payments were received by White & Case from any source other than the Debtors for services rendered or to be rendered in connection with the chapter 11 cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Statement shall serve via email to White & Case and each of the Notice Parties (defined in the Compensation Procedures Order) a written objection identifying with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses, and the basis for such objection (the "Objection") on or before the objection deadline.

4. Upon expiration of the objection deadline, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Statement that are not subject to an objection. If an Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and White & Case shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay White & Case an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

5. Although White & Case has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this Monthly Statement due to delays caused by accounting and processing during the Fee Period. White & Case reserves the right to make further statements or applications to this Court for

allowance of such fees and expenses not included herein, which further statement will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

Dated: December 5, 2025
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP
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Facsimile: (713) 496-9701
Email: charles.koster@whitecase.com

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on December 5, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Summary of Hours and Fees by Timekeeper

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Abouhashish, Salma	**Associate**	N/A	Pool Associates - Corporate	12.1	$870.00	$10,527.00
Ahmed, Heidi	**Associate**	2024	Capital Markets Practice	6.0	$990.00	$5,940.00
Aquije, Alonso	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	73.3	$1,110.00	$81,363.00
Beil, Ryan	**Associate**	2021	Financial Restructuring & Insolvency (FRI) Practice	123.5	$1,280.00	$158,080.00
Binuya, Sebastian Angelo	**Litigation Specialist**	N/A	Practice Technology - Disputes	0.5	$420.00	$210.00
Bourgault, Jacob	**Associate**	2025	Pool Associates - Corporate	241.8	$870.00	$210,366.00
Chase, Ashley	**Associate**	2016	Financial Restructuring & Insolvency (FRI) Practice	213.7	$1,580.00	$337,646.00
Chemborisov, Gleb	**Litigation Specialist**	N/A	Timekeeper Pool	13.6	$490.00	$6,664.00
Chen, Ken	**Project Manager - Litigation Support**	N/A	Practice Technology - Disputes	18.7	$490.00	$9,163.00
Chen, Tony	**Manager of Litigation Support**	N/A	Timekeeper Pool	0.4	$490.00	$196.00
Chitwan, Charu	**Associate**	2014	Financial Restructuring & Insolvency (FRI) Practice	102.5	$1,110.00	$113,775.00
Ericksen, A.J.	**Partner**	2005	Securities Practice	7.3	$2,200.00	$16,060.00
Feld, Elizabeth	**Partner**	2001	Financial Restructuring & Insolvency (FRI) Practice	3.4	$1,790.00	$6,086.00
Gee, Steven	**Partner**	2009	Tax Practice	1.4	$1,900.00	$2,660.00
Greissman, Scott	**Partner**	1995	Financial Restructuring & Insolvency (FRI) Practice	126.1	$2,500.00	$315,250.00
Hirshorn, Deanna	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	3.5	$490.00	$1,715.00
Hong, Alice	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	248.5	$1,370.00	$340,445.00
Isaac, Chantal	**Associate**	N/A	Pool Associates - Corporate	95.5	$870.00	$83,085.00
Kakani, Bhavini	**Associate**	2025	Litigation Practice	80.9	$870.00	$70,383.00
Kates, Paula	**Associate**	2020	Litigation Practice	7.4	$1,370.00	$10,138.00
Koster, Charles	**Partner**	2009	Financial Restructuring & Insolvency (FRI) Practice	10.0	$1,900.00	$19,000.00
Lingle, Barrett	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	58.0	$1,370.00	$79,460.00
Litz, Dominic	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	119.6	$1,370.00	$163,852.00
Ludovici, Stephen	**Staff Attorney**	2014	Financial Restructuring & Insolvency (FRI) Practice	22.0	$1,110.00	$24,420.00
Lupinacci, Frank	**Partner**	2008	M&A - Private Equity Practice	14.6	$1,900.00	$27,740.00
Mago, Don	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	113.5	$990.00	$112,365.00
McNary, Mary Jane	**Legal Assistant**	N/A	Litigation Practice	1.2	$420.00	$504.00

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Miranda, Loredana	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	205.2	$1,220.00	$250,344.00
Morales, Jon	**Project Manager - Litigation Support**	N/A	Practice Technology - Disputes	0.5	$490.00	$245.00
Pesce, Gregory	**Partner**	2011	Financial Restructuring & Insolvency (FRI) Practice	67.9	$2,100.00	$142,590.00
Quintana, Anastasia	**Associate**	N/A	Pool Associates - Litigation	72.0	$870.00	$62,640.00
Rai, Parm	**Associate**	2024	Debt Finance Practice	0.5	$1,110.00	$555.00
Sachdev, Varoon	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	108.9	$1,420.00	$154,638.00
Shore, Christopher	**Partner**	1992	Financial Restructuring & Insolvency (FRI) Practice	116.5	$2,500.00	$291,250.00
Silnicki, Graham	**Associate**	2013	Debt Finance Practice	0.9	$1,470.00	$1,323.00
Smith, Erin	**Counsel**	2014	Financial Restructuring & Insolvency (FRI) Practice	231.9	$1,630.00	$377,997.00
Venes, Aileen	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	10.8	$490.00	$5,292.00
Walz, Jacko	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	194.5	$870.00	$169,215.00
West, Colin	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	156.0	$1,790.00	$279,240.00
Wick, Katie	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	83.8	$490.00	$41,062.00
Yoo, Jade	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	52.1	$1,370.00	$71,377.00
Zahiremami, Golshid	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	59.4	$990.00	$58,806.00
Zakia, Jason	**Partner**	1999	Financial Restructuring & Insolvency (FRI) Practice	95.3	$2,200.00	$209,660.00
Zatz, Andrew	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	133.8	$2,100.00	$280,980.00
Grand Total				**3,309.0**		**$4,604,307.00**

Exhibit B

Statement of Hours and Fees by Project Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B04	Case Administration	30.2	$26,600.00
B05	Case Strategy	76.2	$138,565.00
B07	Claims Administration & Objections	20.7	$23,523.00
B08	Committee Meetings & Communications	37.7	$61,820.00
B09	Corporate, Securities & Regulatory Issues	6.0	$13,440.00
B10	Creditor Communications	10.5	$17,466.00
B11	DIP Financing & Cash Collateral	0.3	$411.00
B12	Discovery	1,647.2	$2,179,725.00
B13	Exclusivity, Plan & Disclosure Statement	522.7	$759,367.00
B14	Executory Contracts & Unexpired Leases	1.4	$1,386.00
B15	Hearings & Court Matters	16.1	$19,461.00
B16	Investigation of Causes of Action	876.8	$1,266,011.00
B18	Mediation	19.4	$45,031.00
B20	Professional Retention & Fees - W&C	35.6	$42,522.00
B21	Professional Retention & Fees - Other	6.4	$5,559.00
B22	Reports, Schedules & US Trustee Issues	0.4	$760.00
B23	Tax Issues	1.4	$2,660.00
	Grand Total	**3,309.0**	**$4,604,307.00**

Exhibit C

Detailed Statement of Hours and Fees

WHITE & CASE

Official Committee of Unsecured Creditors of ModivCare Inc.
RE: Project Emcee

OUR REF: 1908759-0002

For professional services for the period ending 30 November 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Case Administration				
3 November 2025	Review correspondence re: insurance policy renewal.	S Greissman	0.60	1,500.00
3 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
3 November 2025	Update work in progress tracker.	L Miranda	0.10	122.00
3 November 2025	Update work in progress tracker.	D Mago	0.50	495.00
3 November 2025	Review and revise work in progress tracker (0.1); email to D. Mago re: same (0.1).	G Zahiremami	0.20	198.00
3 November 2025	Review docket for updates and update case calendar (0.2); update data site with new documents (0.3); circulate hearing transcript to W&C team (0.1); correspondence with W&C team re: invoices (0.2).	K Wick	0.80	392.00
4 November 2025	Review and comment on work in progress tracker (0.1); correspond with R. Beil re: same (0.1).	V Sachdev	0.20	284.00
4 November 2025	Update internal work in progress tracker (0.2); emails with D. Mago, R. Beil, G. Zahiremami, L. Miranda, and J. Yoo re: same (0.1).	A Hong	0.30	411.00
4 November 2025	Update work in progress tracker.	D Mago	0.50	495.00
4 November 2025	Review and revise work in progress tracker (0.1); email to D. Mago re: same (0.1).	G Zahiremami	0.20	198.00
4 November 2025	Circulate amended hearing transcript.	K Wick	0.10	49.00
5 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
5 November 2025	Update internal work in progress tracker.	A Hong	0.20	274.00
5 November 2025	Revise work in progress tracker.	D Litz	0.20	274.00
5 November 2025	Update work in progress tracker.	D Mago	0.50	495.00
5 November 2025	Review and revise work in progress tracker (0.1); confer with D. Mago re: same (0.1).	G Zahiremami	0.20	198.00
5 November 2025	Review docket for updates and update case calendar (0.5); update data site folder with new documents (0.6).	K Wick	1.10	539.00
6 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 November 2025	Review and revise work in progress tracker (0.3); emails with W&C team re: same (0.1).	G Zahiremami	0.40	396.00
6 November 2025	Review docket for updates and update case calendar.	K Wick	0.30	147.00
7 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.20	284.00
7 November 2025	Emails with D. Mago re: updates to litigation workstreams.	A Hong	0.30	411.00
7 November 2025	Update work in progress tracker.	D Mago	0.40	396.00
7 November 2025	Review and revise work in progress tracker (0.1); email to W&C team re: same (0.1); email to S. Greissman re: listservs (0.1).	G Zahiremami	0.30	297.00
7 November 2025	Review docket for updates and update case calendar (0.6); update data site folder (0.2).	K Wick	0.80	392.00
10 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
10 November 2025	Update internal work in progress tracker.	A Hong	0.20	274.00
10 November 2025	Update work in progress tracker.	D Mago	0.80	792.00
10 November 2025	Review docket for updates and update case calendar.	K Wick	0.20	98.00
11 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
11 November 2025	Update W&C internal work in progress tracker.	A Hong	0.20	274.00
11 November 2025	Update work in progress tracker.	L Miranda	0.20	244.00
11 November 2025	Update work in progress tracker.	D Mago	0.20	198.00
11 November 2025	Review and revise work in progress tracker (0.1); email to D. Mago re: same (0.1).	G Zahiremami	0.20	198.00
11 November 2025	Review and respond to email from L. Miranda re: hearing transcript (0.1); Request October 10, 2025 status conference transcript from Judicial Transcribers (0.1).	D Hirshorn	0.20	98.00
11 November 2025	Review docket for updates and update case calendar.	K Wick	0.20	98.00
12 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
12 November 2025	Update W&C internal work in progress tracker.	A Hong	0.20	274.00
12 November 2025	Update work in progress tracker.	L Miranda	0.10	122.00
12 November 2025	Update work in progress tracker.	D Mago	0.50	495.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 November 2025	Review and revise work in progress tracker (0.1); email same to D. Mago (0.1).	G Zahiremami	0.20	198.00
12 November 2025	Review docket for updates and update case calendar.	K Wick	0.20	98.00
13 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
13 November 2025	Update W&C internal work in progress tracker.	A Hong	0.20	274.00
13 November 2025	Update work in progress tracker.	D Mago	0.40	396.00
13 November 2025	Email L. Miranda, K. Wick and A. Chase copy of requested hearing transcript.	D Hirshorn	0.10	49.00
13 November 2025	Review docket for updates and update case calendar.	K Wick	0.20	98.00
14 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
14 November 2025	Update work in progress tracker.	D Mago	0.30	297.00
14 November 2025	Review docket for updates and update case calendar (0.1); update data site folder (0.3).	K Wick	0.40	196.00
16 November 2025	Analyze docket for updates (0.3); update work in progress tracker (0.6).	D Mago	0.90	891.00
17 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
17 November 2025	Review docket for updates and update case calendar (0.4); circulate calendar invites (0.3); prepare expert report spiral for S. Greissman (0.3); coordinate printing of same (0.1); coordinate deposition logistics (0.2).	K Wick	1.30	637.00
18 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
18 November 2025	Update work in progress tracker.	L Miranda	0.10	122.00
18 November 2025	Update work in progress tracker (0.4); correspondence with L. Miranda re: same (0.1).	D Mago	0.50	495.00
18 November 2025	Review docket for updates and update case calendar (0.2); correspondence with D. Mago re: upcoming hearing (0.1).	K Wick	0.30	147.00
19 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.20	284.00
19 November 2025	Update W&C internal work in progress tracker.	A Hong	0.40	548.00
19 November 2025	Update work in progress tracker (0.3); Correspondence with W&C team re: work in progress tracker (0.1).	D Mago	0.40	396.00
19 November 2025	Review docket for updates and update case calendar (0.3); coordinate conference room for E. Smith (0.1);	K Wick	0.70	343.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	research hearing transcripts for A. Aquije (0.2); correspondence with W&C team re: upcoming schedule (0.1).			
20 November 2025	Review work in progress tracker.	V Sachdev	0.10	142.00
20 November 2025	Email to D. Mago and W&C associate team re: updates to work in progress tracker.	A Hong	0.10	137.00
20 November 2025	Update work in progress tracker.	D Mago	0.40	396.00
20 November 2025	Review docket for updates and update case calendar (0.2); correspondence with W&C teams and vendor re: confirmation hearing logistics (0.2).	K Wick	0.40	196.00
21 November 2025	Review work in progress tracker (0.1); review and analyze first lien lenders' 2019 statement (0.2).	V Sachdev	0.30	426.00
21 November 2025	Update work in progress tracker.	D Mago	0.40	396.00
21 November 2025	Review docket for updates and update case calendar (0.4); Coordinate exhibits shipment to Veritext (0.2).	K Wick	0.60	294.00
22 November 2025	Prepare PHV motion for C. West (0.2); correspondence with W&C team re: same (0.1).	K Wick	0.30	147.00
24 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
24 November 2025	Update W&C internal work in progress tracker.	A Hong	0.30	411.00
24 November 2025	Finalize and file PHV for C. West and emails re: same with L. Miranda and K. Wick.	C Chitwan	0.40	444.00
24 November 2025	Update work in progress tracker.	D Mago	0.70	693.00
24 November 2025	Review and respond to emails with V. Sachdev re: upcoming filings (0.1); locate and email requested pleadings in ModivCare to G. Pesce, P. Abelson, S. Hershey, J. Yoo and A. Venes (0.7); confer with J. Yoo re: same (0.1); confer with L. Miranda re: same (0.1).	D Hirshorn	1.00	490.00
24 November 2025	Review and respond to email from L. Miranda re: assistance with finalizing exhibits to letter to Court re: Silver's Declaration and e-filing of same (0.1); finalize exhibits ahead of submission and send to team for final review (0.3); review and respond to update emails from team re: timing of filing (0.1); prepare for, and assist with e-filing of letter/exhibits, and potential litigation supplement (1.0); serve filed documents (Chambers and MSL) (0.2); update pleadings file (0.1).	A Venes	1.80	882.00
24 November 2025	Coordinate filing of PHV motion (0.1); coordinate printing of hard copies of schedules and SOFAs for A. Zatz (0.4); pull deposition transcripts and coordinate printing for S Greissman (0.4); circulate calendar invite to team (0.2).	K Wick	1.10	539.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 November 2025	Update W&C internal work in progress tracker.	A Hong	0.10	137.00
25 November 2025	Update work in progress tracker.	L Miranda	0.20	244.00
25 November 2025	Review docket and update case calendar (0.2); update list serv (0.2).	K Wick	0.40	196.00
26 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
26 November 2025	Update work in progress tracker.	L Miranda	0.20	244.00
26 November 2025	Update work in progress tracker.	D Mago	0.70	693.00
26 November 2025	Review docket and update case calendar (0.3); order hearing transcript (0.3).	K Wick	0.60	294.00
28 November 2025	Review and comment on work in progress tracker.	V Sachdev	0.10	142.00
28 November 2025	Review correspondence re: next steps.	B Lingle	0.20	274.00
28 November 2025	Update work in progress email.	D Mago	0.20	198.00
SUBTOTAL: Case Administration			**30.20**	**26,600.00**

Case Strategy

3 November 2025	Review and confer with A. Zatz re: insurance questions from company.	D Litz	0.30	411.00
4 November 2025	Attend weekly financial advisor meetings (0.5); attend telephone conferences with W&C team re: strategy (0.5).	J Shore	1.00	2,500.00
4 November 2025	Strategy call with Alix (0.9); strategy call with Jupiter (0.3); internal strategy e-mail (0.2).	A Zatz	1.40	2,940.00
4 November 2025	Call with core W&C team and Alix re: strategy.	V Sachdev	0.90	1,278.00
4 November 2025	Committee advisor meeting re: strategy and expert reports.	D Litz	0.90	1,233.00
5 November 2025	Confer with C. Shore and S. Greissman re: case strategy.	J Zakia	0.40	880.00
5 November 2025	Review recent pleading and summary of same.	D Litz	0.30	411.00
6 November 2025	Conferences with W&C and Alix teams re: valuation.	G Pesce	0.80	1,680.00
6 November 2025	Preparation call with Alix and core W&C team re: strategy for Committee meeting.	V Sachdev	0.40	568.00
7 November 2025	Telephone conferences with W&C team re: strategy.	J Shore	0.50	1,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 November 2025	Confer with C. Shore re: case strategy.	J Zakia	0.30	660.00
7 November 2025	Conferences with W&C and Alix teams re: valuation strategy (0.8); Conferences with W&C and Alix teams re: strategy (0.8).	G Pesce	1.60	3,360.00
10 November 2025	Conferences with W&C and Alix teams re: Plan objections.	G Pesce	1.80	3,780.00
10 November 2025	Strategy call with C. Koster (0.1); internal strategy meeting with W&C team (0.4); and strategy call with C. West (0.2).	A Zatz	0.70	1,470.00
10 November 2025	Review recently filed pleadings.	D Litz	0.50	685.00
11 November 2025	Conferences with W&C and Alix teams re: Plan valuation.	G Pesce	1.30	2,730.00
11 November 2025	Internal strategy call (0.6); and Committee advisor strategy call (0.6).	A Zatz	1.20	2,520.00
11 November 2025	Call among W&C and Alix re: case strategy.	A Chase	0.60	948.00
11 November 2025	Meeting with AlixPartners & W&C team re: strategy.	D Litz	0.50	685.00
12 November 2025	Telephone conferences re strategy with W&C team.	J Shore	0.50	1,250.00
12 November 2025	Conferences with W&C and Alix teams re: objections.	G Pesce	2.80	5,880.00
13 November 2025	Conferences with W&C and Alix teams re: Plan, valuation.	G Pesce	2.80	5,880.00
13 November 2025	Internal strategy call with W&C and Alix team.	A Zatz	0.70	1,470.00
13 November 2025	Strategy call with Committee advisors.	D Litz	0.50	685.00
14 November 2025	Confer with C. Shore re: case strategy.	J Zakia	0.40	880.00
14 November 2025	Conferences with W&C and Alix teams re: strategy.	G Pesce	1.10	2,310.00
15 November 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	1.80	3,780.00
15 November 2025	Correspondence with J. Zakia, E. Smith, S. Greissman, G. Pesce, C. West, L. Miranda, R. Beil, and B. Lingle re: all-hands meeting.	V Sachdev	0.10	142.00
16 November 2025	Internal status/strategy call with W&C and Alix team.	S Greissman	0.90	2,250.00
16 November 2025	Call with W&C team re: litigation work streams and case strategy.	J Zakia	0.90	1,980.00
16 November 2025	Conferences with W&C and Alix teams re: DIP Financing and case valuation strategy and tactics	G Pesce	1.70	3,570.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.8); conference with W&C team re: case and confirmation strategy (0.9).			
16 November 2025	Internal strategy call with W&C team.	A Zatz	0.90	1,890.00
16 November 2025	Call with W&C team re: work streams.	A Chase	0.90	1,422.00
16 November 2025	Attend all-hands strategy call with W&C team.	V Sachdev	0.90	1,278.00
16 November 2025	Strategy call with C. Shore, S. Greissman, C. West, E. Smith, A. Chase, L. Miranda, and team re: workstreams (0.9); call with A. Chase, L. Miranda, and associate team re: litigation workstreams (0.4).	A Hong	1.30	1,781.00
16 November 2025	Telephone conference with W&C team re: case strategy and next steps.	B Lingle	0.90	1,233.00
16 November 2025	Meeting with W&C team re: case strategy.	D Litz	0.90	1,233.00
16 November 2025	Attend W&C team strategy call.	J Yoo	0.90	1,233.00
16 November 2025	Attend W&C all hands workstreams call.	R Beil	0.90	1,152.00
16 November 2025	Attend W&C strategy call.	L Miranda	0.90	1,098.00
16 November 2025	Attend strategy meeting (0.9); Attend follow-up litigation team strategy meeting (0.4).	J Bourgault	1.30	1,131.00
16 November 2025	Conference call with A. Chase, E. Smith and rest of team re: case strategy (0.9); conference call with A. Chase and L. Miranda re: case strategy research (0.4).	C Isaac	1.30	1,131.00
16 November 2025	Call with E. Smith, C. West, and J. Zakia re: case strategy (0.9); call with L. Miranda and A. Case re: case strategy and upcoming depositions (0.3).	A Quintana	1.20	1,044.00
16 November 2025	Attend all hands strategy call (0.9); attend follow up call attend follow up call (0.3).	J Walz	1.20	1,044.00
17 November 2025	Telephone conferences re strategy with W&C team.	J Shore	0.80	2,000.00
18 November 2025	Weekly strategy meeting with Alix Partners.	S Greissman	0.50	1,250.00
18 November 2025	Strategy calls with W&C team.	J Shore	0.50	1,250.00
18 November 2025	Conferences with W&C and Alix teams re: DIP and case valuation strategy and tactics.	G Pesce	2.80	5,880.00
18 November 2025	Strategy call with Alix.	A Zatz	0.50	1,050.00
18 November 2025	Attend call with core W&C team and Alix team re: strategy.	V Sachdev	0.40	568.00
18 November 2025	W&C and AlixPartners team strategy meeting.	D Litz	0.50	685.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 November 2025	Telephone conferences re strategy with W&C team.	J Shore	0.80	2,000.00
19 November 2025	Conferences with W&C and Alix teams re: DIP and case valuation strategy and tactics.	G Pesce	1.80	3,780.00
20 November 2025	Conferences with W&C and Alix teams re: strategy and tactics.	G Pesce	0.80	1,680.00
20 November 2025	Call with Alix, D. Litz, B. Lingle, A. Zatz, and S. Greissman in preparation for Committee meeting and go forward strategy (0.3); call with B. Lingle re: same (0.3).	V Sachdev	0.60	852.00
20 November 2025	Researching re: motion deadlines.	A Quintana	3.10	2,697.00
21 November 2025	Conferences with W&C and Alix teams re: Plan strategy.	G Pesce	2.80	5,880.00
22 November 2025	Conferences with W&C and Alix teams re: case strategy.	G Pesce	1.80	3,780.00
22 November 2025	Internal strategy call.	A Zatz	1.00	2,100.00
22 November 2025	Call among W&C team re: case strategy and trial preparation.	A Chase	1.00	1,580.00
22 November 2025	Internal strategy call with core W&C team members.	V Sachdev	1.00	1,420.00
22 November 2025	Strategy call with J. Zakia, S. Greissman, C. West, A. Zatz, E. Smith, A. Chase, and W&C team re: pre-trial workstreams.	A Hong	1.00	1,370.00
22 November 2025	W&C meeting re: strategy.	D Litz	1.00	1,370.00
22 November 2025	Attend call with W&C team re: trial strategy.	D Mago	0.90	891.00
23 November 2025	Conferences with W&C and Alix teams re: valuation.	G Pesce	1.80	3,780.00
23 November 2025	Strategy call with Alix.	A Zatz	0.50	1,050.00
24 November 2025	Conferences with W&C and Alix teams re: Plan objections.	G Pesce	1.80	3,780.00
25 November 2025	Conferences with W&C and Alix teams re: Plan objections.	G Pesce	0.80	1,680.00
25 November 2025	Call with Alix, S. Greissman, A. Zatz, B. Lingle, and D. Litz re: strategy in advance of call with Committee.	V Sachdev	0.30	426.00
26 November 2025	Conferences with W&C and Alix teams re: Plan objections.	G Pesce	1.80	3,780.00
26 November 2025	Correspondence re: ongoing workstreams (0.2); strategy call with S. Greissman (0.2).	A Zatz	0.40	840.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 November 2025	Conferences with W&C and Alix teams re: Plan objections.	G Pesce	0.80	1,680.00
28 November 2025	Conferences with W&C and Alix teams re: Plan objections.	G Pesce	0.80	1,680.00
28 November 2025	Internal strategy call.	A Zatz	0.50	1,050.00
SUBTOTAL: Case Strategy			**76.20**	**138,565.00**

Claims Administration & Objections

6 November 2025	Review 1L proof of claim (0.2); confer with A. Zatz re: same (0.1); call with A. Zatz re: same (0.1); review claim objection procedures (0.4) and confer with A. Zatz re: same (0.1).	V Sachdev	0.90	1,278.00
11 November 2025	Call with G. Pesce re: claims administration process (0.3); review plan re: same (0.3).	D Litz	0.60	822.00
18 November 2025	Confer with A. Zatz re: makewhole challenge (0.2); confer with D. Mago re: same (0.2).	V Sachdev	0.40	568.00
18 November 2025	Legal research re: precedent claim objections (3.9); summary email to V. Sachdev re: same (0.1); legal research re: claim objection (1.3).	D Mago	5.30	5,247.00
19 November 2025	Research makewhole case law and review related precedents (2.6); confer with D. Mago re: same (0.1); review proof of claim and credit agreement (0.4).	V Sachdev	3.10	4,402.00
19 November 2025	Analyze proof of claim (0.2); email V. Sachdev re: same (0.1); legal research re: claim objection (0.7).	D Mago	1.00	990.00
20 November 2025	Review D. Mago's research re: makewhole (0.4); correspond with D. Mago re: same (0.1); calls with D. Mago re: same (0.2).	V Sachdev	0.70	994.00
20 November 2025	Call with V. Sachdev re: claim objection (0.2); analyze first lien credit agreement and amendment (1.7); correspondence with V. Sachdev re: same (0.1); legal research re: claims allowance (4.1); draft email memo to V. Sachdev re: same (0.4).	D Mago	6.50	6,435.00
26 November 2025	Correspondence re: make-whole issue.	A Zatz	0.20	420.00
26 November 2025	Correspond with D. Mago re: make-whole objection (0.1); review local rules re: same (0.1); correspond with A. Zatz re: same (0.2); correspond with C. Shore, S. Greissman, and A. Zatz re: same (0.5).	V Sachdev	0.90	1,278.00
26 November 2025	Review precedent claim objection (0.2); review local rules for claim objection (0.2); draft shell objection (0.4); email to V. Sachdev re: same (0.1); analyze email re: claims register (0.1); correspondence with A. Zatz and D. Litz re: same (0.1).	D Mago	1.10	1,089.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
SUBTOTAL: Claims Administration & Objections			**20.70**	**23,523.00**

Committee Meetings & Communications

4 November 2025	Draft meeting minutes re: October 23 Committee meeting.	D Mago	0.70	693.00
5 November 2025	Draft agenda for Committee meeting on November 5 (0.4); draft meeting minutes re: October 30 Committee meeting (0.6).	D Mago	1.00	990.00
6 November 2025	Committee advisor pre-call (0.5); committee weekly call (1.0); analyze criminal and regulatory re: disclosure (0.5).	S Greissman	2.00	5,000.00
6 November 2025	Attend Committee advisor pre-call (0.5); attend call with Committee (0.6).	J Shore	1.10	2,750.00
6 November 2025	Pre-call with Alix (0.5); and Committee update call (1.0).	A Zatz	1.50	3,150.00
6 November 2025	Attend Committee call.	C Koster	0.80	1,520.00
6 November 2025	Attend Committee call.	C West	1.00	1,790.00
6 November 2025	Participate in coordinating meeting with Alix (0.5) and meeting with the Committee (1.0).	E Smith	1.50	2,445.00
6 November 2025	Call among Committee and Committee advisors.	A Chase	1.00	1,580.00
6 November 2025	Attend Committee meeting with core Alix and W&C teams.	V Sachdev	1.00	1,420.00
6 November 2025	Attend Committee meeting.	A Hong	0.50	685.00
6 November 2025	Weekly advisors call re: Committee meeting.	B Lingle	0.50	685.00
6 November 2025	Prepare for and attend Committee advisor meeting (0.4); Committee meeting (1.0).	D Litz	1.40	1,918.00
6 November 2025	Attend Committee standing call and prepare meeting notes.	G Zahiremami	1.00	990.00
7 November 2025	Conferences with W&C, Alix and Committee representatives re: confidential case strategy and tactics.	G Pesce	0.80	1,680.00
10 November 2025	Correspondence with A. Zatz re: November 13 Committee meeting scheduling.	D Mago	0.10	99.00
10 November 2025	Revise Committee meeting minutes (0.6); email same to D. Mago (0.1).	G Zahiremami	0.70	693.00
12 November 2025	Draft agenda re: Committee call on November 13	D Mago	0.30	297.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.2); correspondence with D. Litz re: same (0.1).			
13 November 2025	Pre-call for Committee call (0.5); and Committee update call (0.6).	A Zatz	1.10	2,310.00
13 November 2025	Meeting with Committee.	C Koster	0.50	950.00
13 November 2025	Strategy and coordinating call with Alix Partners (0.5); participate in Committee call and answer calls re: discovery (1.0).	E Smith	1.50	2,445.00
13 November 2025	Attend weekly Committee advisor pre-call.	B Lingle	0.50	685.00
13 November 2025	Attend meeting and take notes re: Committee call November 13.	D Mago	0.80	792.00
19 November 2025	Correspondence with M. Warren re: 2019 statement.	S Greissman	0.10	250.00
19 November 2025	Reviewing Committee call agenda and Alix update.	A Zatz	0.20	420.00
19 November 2025	Review and provide comments on Alix meeting materials.	D Litz	0.20	274.00
19 November 2025	Draft agenda for 11/20 Committee call.	D Mago	0.40	396.00
20 November 2025	Committee/Advisor pre-call (0.5); Committee weekly call (0.8).	S Greissman	1.30	3,250.00
20 November 2025	Attend Committee advisor pre-call (0.3); attend Committee update call (0.6).	A Zatz	0.90	1,890.00
20 November 2025	Participate in Committee meeting.	E Smith	0.50	815.00
20 November 2025	Attend call among Committee and advisors.	A Chase	0.60	948.00
20 November 2025	Attend Committee call with core Alix and W&C teams.	V Sachdev	0.60	852.00
20 November 2025	Attend weekly Committee advisor pre-call.	B Lingle	0.30	411.00
20 November 2025	W&C and AlixPartners strategy meeting pre-Committee call (0.4); attend Committee meeting (0.6).	D Litz	1.00	1,370.00
20 November 2025	Attend 11/20 Committee meeting and take notes.	D Mago	0.60	594.00
21 November 2025	Send hearing info to Committee (0.1); draft 11/14 meeting minutes (1.2); draft 11/20 meeting minutes (0.6).	D Mago	1.90	1,881.00
24 November 2025	Review proposed agenda and confer with D. Mago re: same (0.2); review and provide comments to Alix materials for Committee meeting (0.4).	D Litz	0.60	822.00
24 November 2025	Draft agenda for 11/25 Committee call.	D Mago	0.20	198.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 November 2025	Pre-call re: weekly Committee update (0.4); Committee update call (0.7); correspondence with Jupiter internal legal re: administrative issues (0.3).	S Greissman	1.40	3,500.00
25 November 2025	Attending Committee update call.	A Zatz	0.50	1,050.00
25 November 2025	Participate in strategy and Committee calls.	E Smith	1.40	2,282.00
25 November 2025	Call among W&C and Alix to prepare for meeting with Committee (0.3); attend meeting among Committee and advisors (0.6).	A Chase	0.90	1,422.00
25 November 2025	Attend call with Committee and core W&C and Alix teams.	V Sachdev	0.40	568.00
25 November 2025	Attend Committee meeting.	A Hong	0.50	685.00
25 November 2025	Weekly advisor pre-call.	B Lingle	0.30	411.00
25 November 2025	Advisor pre-call (0.3); meeting with Committee re: strategy (0.7).	D Litz	1.00	1,370.00
25 November 2025	Attend meeting with Committee and take notes.	D Mago	0.60	594.00
SUBTOTAL: Committee Meetings & Communications			**37.70**	**61,820.00**

Corporate, Securities & Regulatory Issues

12 November 2025	Conference call with Latham & Watkins and Paul Hastings re: director-related issues and proposed correspondence (0.3); correspondence with Latham & Watkins re: same (0.2); follow up conference call with S. Shore re: same (0.2); follow up internal correspondence re: same (0.1).	S Greissman	0.80	2,000.00
18 November 2025	Analyze rights offering procedures.	A Ericksen	3.80	8,360.00
19 November 2025	Review form of warrant agreement in Plan supplement.	A Ericksen	1.40	3,080.00
SUBTOTAL: Corporate, Securities & Regulatory Issues			**6.00**	**13,440.00**

Creditor Communications

3 November 2025	1L counsel meet and conference (0.5); review potential litigation issue and documentation in value analysis (1.5).	S Greissman	2.00	5,000.00
5 November 2025	Conference calls with C. Shore re: Committee threats by 1L (0.5); follow up to C. Shore conference call (0.3).	S Greissman	0.80	2,000.00
6 November 2025	Internal correspondence re: Committee communications with Q Investments.	S Greissman	0.50	1,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 November 2025	Research prohibited acts in bankruptcy re: creditor communications (2.2); Research professional duties re: attorney disclosure obligations (0.8); Research Committee members fiduciary duties re: Committee disclosure obligations (1.0); analyze ABI Committee handbook re: same (0.4); Summarize research on prohibited acts and professional and Committee obligations re: same (0.6).	R Beil	5.00	6,400.00
7 November 2025	Draft and revise summary of prohibited acts in bankruptcy re: creditor communications (0.5); analyze Neiman Marcus pleadings re: same (0.5); analyze Committee manuals re: same (0.9).	R Beil	1.90	2,432.00
18 November 2025	Call with creditor re: ballot and proof of claim questions.	R Beil	0.30	384.00
SUBTOTAL: Creditor Communications			**10.50**	**17,466.00**

DIP Financing & Cash Collateral

19 November 2025	Correspond with A. Zatz and Alix team re: exit financing.	B Lingle	0.30	411.00
SUBTOTAL: DIP Financing & Cash Collateral			**0.30**	**411.00**

Discovery

1 November 2025	Review expert report drafts (0.7); correspondence with G. Magrisi and R. Komendowski re: scheduling (0.5); review lender document production (0.6).	E Smith	1.80	2,934.00
1 November 2025	Review documents to prepare for B. Gutierrez deposition.	A Chase	2.80	4,424.00
1 November 2025	Prepare deposition outline.	A Aquije	1.00	1,110.00
1 November 2025	Continue reviewing surety documents.	C Chitwan	1.00	1,110.00
1 November 2025	Conduct document review.	J Bourgault	1.50	1,305.00
1 November 2025	Review documents produced by Debtors in preparation of corporate designee deposition.	B Kakani	2.10	1,827.00
1 November 2025	Review of and cataloging documents responsive to investigation.	A Quintana	2.20	1,914.00
2 November 2025	Review Alix expert report.	S Greissman	1.50	3,750.00
2 November 2025	Email among W&C re: upcoming depositions (0.6); prepare for B. Gutierrez deposition (2.1).	A Chase	2.70	4,266.00
2 November 2025	Draft chart re: deposition witness schedule and topics (0.5); emails with A. Chase and L. Miranda re: depositions (0.4); emails with L. Miranda and A. Aquije	A Hong	6.00	8,220.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	re: S. Kern deposition (0.3); review documents re: S. Kern flagged by A. Aquije (1.9); revise S. Kern deposition outline (2.9).			
2 November 2025	Assist with deposition preparation and outline.	J Yoo	0.30	411.00
2 November 2025	Draft deposition outline.	A Aquije	5.20	5,772.00
2 November 2025	Conduct document review re: confirmation objections.	J Bourgault	5.50	4,785.00
2 November 2025	Review documents produced by Debtors to prepare for corporate designee deposition.	B Kakani	3.10	2,697.00
2 November 2025	Review and summary of documents responsive to investigation in preparation for upcoming witness deposition.	A Quintana	2.30	2,001.00
2 November 2025	Document review re: confirmation objections.	J Walz	3.30	2,871.00
2 November 2025	Unzip production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.1).	G Chemborisov	2.00	980.00
3 November 2025	Call with W&C and Alix teams re: depositions (0.5); attend meet and confer with 1L counsel (0.5).	J Shore	1.00	2,500.00
3 November 2025	Prepare for depositions.	J Zakia	2.30	5,060.00
3 November 2025	Calls and correspondence with C. Shore, C. West, J. Zakia re: deposition scheduling (1.0); document review (2.0); correspondence with Debtors re: depositions (0.7); review deposition preparation and calls and correspondence with litigation team re: same (2.0); prepare for and participate in meet and confer with Paul Hastings (0.8).	E Smith	6.50	10,595.00
3 November 2025	Review and revise outline for deposition of B. Gutierrez (6.8); review documents re: same (5.9); email among W&C re: discovery schedule (0.4).	A Chase	13.10	20,698.00
3 November 2025	Call with L. Miranda, J. Walz, and B. Kakani re: second chairing depositions (0.5); emails with document review team re: review of S. Kern documents (0.5); review documents re: S. Kern (2.5); revise S. Kern deposition outline (2.9); emails with E. Smith, A. Chase, L. Miranda, and B. Kakani re: deposition logistics (0.5); emails with A. Aquije re: S. Kern deposition outline (0.5).	A Hong	7.40	10,138.00
3 November 2025	Attend meet and confer with Paul Hastings (0.5); draft notes re: same for W&C (0.2); review responses and objections re: same (0.2).	L Miranda	0.90	1,098.00
3 November 2025	Further revise deposition outline re: comments from A.	A Aquije	3.20	3,552.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Hong.			
3 November 2025	Continue reviewing surety related documents (3.0); commence reviewing documents for Kern deposition (6.0); discussions with L. Miranda re: same (0.5).	C Chitwan	9.50	10,545.00
3 November 2025	Conduct document review (9.6); Meet with A. Hong & L. Miranda to discuss deposition strategy (0.5).	J Bourgault	10.10	8,787.00
3 November 2025	Conduct review of document production re: investigation.	C Isaac	7.00	6,090.00
3 November 2025	Prepare for corporate designee depositions.	B Kakani	6.30	5,481.00
3 November 2025	Review of and cataloging documents responsive to investigation (2.1); Preparing and organizing files for upcoming deposition of Barbara Gutierrez (1.0).	A Quintana	3.10	2,697.00
3 November 2025	Prepare for deposition of H. Sampson (0.1); correspondence re: hot documents (0.1); document review (3.8); attend meeting re: depositions (0.5).	J Walz	4.50	3,915.00
3 November 2025	Create search for case team.	K Chen	0.50	245.00
4 November 2025	Conference call with Alix re: analysis and diligence (0.4); review expert rebuttal reports and updated slide (2.1).	S Greissman	2.50	6,250.00
4 November 2025	Preparation for depositions (2.5); review document productions (2.5).	J Shore	5.00	12,500.00
4 November 2025	Prepare for deposition.	J Zakia	2.10	4,620.00
4 November 2025	Call with Alix re: expert reports (0.9); review changes to expert report slides (0.6); preparation for Gutierrez deposition (0.7).	C West	2.20	3,938.00
4 November 2025	Review rebuttal reports (3.5); calls and correspondence re: same (1.6); meeting with litigation team re: deposition and discovery work streams (1.0); review documents and deposition outlines (3.3).	E Smith	9.40	15,322.00
4 November 2025	Call among W&C associates re: deposition preparation (0.5); continue refining outline and reviewing documents to prepare for Gutierrez deposition (12.9).	A Chase	13.40	21,172.00
4 November 2025	Revise S. Kern deposition outline (2.5); call with J. Bourgault re: depositions (0.1); call with E. Smith, A. Chase, and litigation team re: depositions (0.5); emails with B. Kakani re: S. Kern deposition logistics (0.5); emails with J. Bourgault, J. Walz, and document review team re: S. Kern documents (0.7); review documents flagged by A. Aquije, J. Bourgault, and document review team re: S. Kern (2.6); emails with A. Aquije, J. Bourgault, and K. Wick re: S. Kern deposition materials (1.5); emails with AlixPartners team re: S. Kern deposition (0.5); review questions	A Hong	13.10	17,947.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	and documents from AlixPartners for S. Kern deposition (0.5); revise S. Kern deposition outline (3.3); emails with E. Smith, A. Chase, and B. Kakani re: deposition logistics (0.4).			
4 November 2025	Diligence call with Committee advisors and Company advisors.	D Litz	0.40	548.00
4 November 2025	Further revise deposition document index (0.5); call with W&C team re: upcoming depositions and discovery (0.5); further revise deposition outline re: board materials for A. Hong (9.0).	A Aquije	10.00	11,100.00
4 November 2025	Attend call with E. Smith, A. Chase, A. Hong and other W&C case litigation members (0.5); finish review of documents for Kern deposition and emails with A. Hong and A. Aquije re: same (9.5).	C Chitwan	10.00	11,100.00
4 November 2025	Conduct document review (3.9); Prepare for S. Kern deposition (11.8).	J Bourgault	15.70	13,659.00
4 November 2025	Conference call with E. Smith, and A. Chase re: deposition updates and next steps (0.5); conduct review of document production re: investigation (7.0).	C Isaac	7.50	6,525.00
4 November 2025	Prepare for corporate designee depositions.	B Kakani	5.70	4,959.00
4 November 2025	Review of and cataloging documents responsive to Scott Kern deposition (3.0); Meeting with E. Smith to plan for upcoming depositions of other witnesses (0.5).	A Quintana	3.50	3,045.00
4 November 2025	Compile documents for Kern deposition (0.8); attend call with document review team (0.5); work planning re: open discovery tasks (0.5); attend call with AlixPartners team re: financial discovery issues (0.9); prepare documents for S. Kern deposition (0.2).	J Walz	2.90	2,523.00
4 November 2025	Edit and prepare deposition materials for J. Bourgault (1.9); coordinate printing and delivery of same (0.8).	K Wick	2.70	1,323.00
5 November 2025	Conference call with Alix team re: expert reports and related (0.8); monitor B. Gutierrez deposition (2.5).	S Greissman	3.30	8,250.00
5 November 2025	Preparation for S. Kern deposition (2.5); review document productions (2.0); follow up on B. Guiterrez deposition (0.5); telephone conferences with Alix and W&C teams re: expert reports (0.5); review expert materials (0.5); attend W&C team telephone conferences (1.0).	J Shore	7.00	17,500.00
5 November 2025	Prepare for and participate in expert call, follow up with expert re: same.	J Zakia	0.70	1,540.00
5 November 2025	Preparation for Gutierrez deposition (0.5); attend Gutierrez deposition and follow-up discussions re: same (5.6).	C West	6.10	10,919.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
5 November 2025	Review document production logistics (0.8); meetings with litigation team re: deposition preparation and outlines (1.9); review documents for depositions (3.7); attention expert discovery (2.0); discuss potential litigation and questions for deposition with V. Sachdev (0.7); telephone conferences re: deposition logistics with W&C team and Latham team (1.0).	E Smith	10.10	16,463.00
5 November 2025	Prepare for Gutierrez deposition (5.7); take deposition of B. Gutierrez (5.6); draft summary of deposition (0.8).	A Chase	12.10	19,118.00
5 November 2025	Emails with A. Aquije, J. Bourgault, and K. Wick re: S. Kern deposition materials (1.0); emails with A. Aquije, J. Bourgault re: Kern deposition outline (1.0); revise S. Kern deposition outline (3.0); emails with C. Shore and E. Smith re: Kern deposition outline and exhibits (0.3); emails with A. Chase and B. Kakani re: deposition logistics (0.5); second chair B. Gutierrez deposition (5.5); review notes from AlixPartners re: Kern deposition (0.9); confer with E. Smith and A. Chase re: Kern and Shepard depositions (0.5); emails with J. Amico and R. Komendwoski re: K. Shepard deposition (0.2); revise S. Kern deposition outline (1.5).	A Hong	14.40	19,728.00
5 November 2025	Meeting with W&C and Alix team re: expert reports.	D Litz	0.30	411.00
5 November 2025	Further revise deposition outline re: comments from A. Hong (1.4); draft supplemental deposition outline, including points from Alix Partners (1.3); coordinate deposition folder preparation (0.2).	A Aquije	2.90	3,219.00
5 November 2025	Prepare for S. Kern deposition (8.3); Prepare for D. Gonzales deposition (3.5); Conduct document review (0.3); Prepare for K. Shepard deposition (2.5).	J Bourgault	14.60	12,702.00
5 November 2025	Conduct review of document production re: investigation (6.0); conduct targeted searches of document production (1.5).	C Isaac	7.50	6,525.00
5 November 2025	Prepare for corporate designee depositions.	B Kakani	9.50	8,265.00
5 November 2025	Review of and cataloging documents responsive to investigation and Ken Shepard deposition.	A Quintana	4.60	4,002.00
5 November 2025	Call with E. Smith re: AlixPartners call (0.1); call with AlixPartners re: valuation issues (0.3); summarize meeting for E. Smith (0.1); attend deposition of B. Gutierrez (5.0); identify key documents re: UHC settlement (0.2); discussion with B. Kakani and C. Chitwan (partial) re: workplan for documents for K. Shepard deposition (1.3); preparation of documents re: same (6.0).	J Walz	13.00	11,310.00
5 November 2025	Production FLL_PROD002 load quality control (0.6); create batch search and batch documents for review (0.5); release production to case team and provide production summary (0.2); download and extract prod MODV_019 (0.3); load production MODV_019 (0.7); production load quality control (0.3); create batch	K Chen	3.20	1,568.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	search and batch documents for review (0.4); release production with summary (0.2).			
5 November 2025	Unzip production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.2).	G Chemborisov	2.10	1,029.00
5 November 2025	Coordinate delivery of deposition materials (0.4); coordinate printing of deposition materials (0.6); coordinate deposition logistics for tomorrow (1.3).	K Wick	2.30	1,127.00
6 November 2025	Monitor S. Kern deposition.	S Greissman	4.50	11,250.00
6 November 2025	Attend S. Kern Deposition (4.5); follow-up emails with W&C team re: same (0.5); telephone conferences with W&C team re: open discovery items (0.8).	J Shore	5.80	14,500.00
6 November 2025	Prepare for depositions.	J Zakia	3.10	6,820.00
6 November 2025	Attend Kern deposition (partial) (1.3); review materials for deposition preparation (0.9).	C West	2.20	3,938.00
6 November 2025	Review open discovery issues (2.0); document review (2.5); correspondence re: deposition preparation and deposition outlines (2.3); assist with deposition of S. Kern (3.0).	E Smith	9.80	15,974.00
6 November 2025	Review Debtors' interrogatory responses (0.5); email among W&C re: preparation for depositions (1.3); attend portion of Kern deposition (1.8).	A Chase	3.60	5,688.00
6 November 2025	Emails with C. Shore and E. Smith re: updates to S. Kern deposition outline and logistics (0.5); emails with A. Aquije and J. Bourgault re: urgent review of S. Kern documents in Debtors' new production (0.5); emails with B. Kakani and K. Wick re: deposition logistics and exhibits (0.9); review S. Kern documents flagged by A. Aquije and J. Bourgault (1.0); emails with S. Smith, B. Kakani, and document review team re: K. Shepard documents (0.8); emails with E. Smith, A. Chase, A. Aquije, J. Bourgault, and Alix team re: financial projections (1.0); review financial projections and cleansing materials (1.0); emails with D. Litz, R. Beil, and G. Zahiremami re: blowout materials (0.3); second chair S. Kern deposition (4.7); call with K. Wick re: S. Kern deposition follow-up (0.3); confer with B. Kakani re: K. Shepard deposition (0.5); emails with E. Smith and A. Chase re: Debtors' allocation of corporate designee topics (0.5); review documents re: K. Shepard (2.0).	A Hong	14.00	19,180.00
6 November 2025	Further revise deposition outline for S. Kern (2.0); document review re: produced documents (1.1); assist A. Hong re: S. Kern deposition (0.8).	A Aquije	3.90	4,329.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 November 2025	Prepare for S. Kern deposition (3.4); Prepare for K. Shepard deposition (1.4); Prepare for D. Gonzales deposition (4.6); Draft and circulate S. Kern deposition meeting notes (3.2).	J Bourgault	12.60	10,962.00
6 November 2025	Conduct document review re: investigation.	C Isaac	6.20	5,394.00
6 November 2025	Prepare for corporate designee depositions.	B Kakani	13.40	11,658.00
6 November 2025	Review of and cataloging documents responsive to Ken Shepard deposition (1.1); Review of production re: trade creditor issues (2.0).	A Quintana	3.10	2,697.00
6 November 2025	Discussion with B. Kakani re: preparation for Shepard deposition (0.2); review documents re: same (1.5); call with E. Smith and B. Kakani re: same (0.5); prepare documents for same (4.5); draft H. Sampson deposition outline (1.4).	J Walz	8.10	7,047.00
6 November 2025	Download productions FLL_PROD003 and JPMC002 (0.5); extract productions (0.3); stage and log both productions (0.4); load productions FLL_PROD003 and JPMC002 (0.9); quality control both production loads (0.6); create search for PDF export (0.3); export PDFs by family (0.4); quality control export and send to case team (0.4).	K Chen	3.80	1,862.00
6 November 2025	Run saved search for target documents in Relativity (0.4); emails with case team re: results (0.1).	J Morales	0.50	245.00
6 November 2025	Unzip production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.2); upload (0.2); folder items (0.1); run quality control (0.1); run optical character recognition and update index (0.2).	G Chemborisov	2.00	980.00
6 November 2025	Deposition preparation (1.7); prepare hard copies and deliver deposition documents to conference room (1.9); prepare index of new deposition materials (2.8); coordinate printing and delivery of same (0.5); coordinate delivery of deposition exhibits to Veritext (0.3).	K Wick	7.20	3,528.00
7 November 2025	Preparation for K. Shepherd deposition (1.0); review discovery materials (0.5); emails with W&C team re: discovery issues (0.4); review draft reports (1.5); telephone conferences re: edits re: same (0.5).	J Shore	3.90	9,750.00
7 November 2025	Review draft expert report and confer with expert team re: same (1.3); prepare for conference with business plan expert team re: deposition questions (0.5); review draft business plan report (1.1); prepare for depositions (2.1).	J Zakia	5.00	11,000.00
7 November 2025	Assist with Sampson deposition (2.5); deposition and outline review and coordination (2.0); telephone conferences with litigation team re: deposition	E Smith	9.30	15,159.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	preparation (1.0); correspondence re: document review and open discovery issues (2.0); meet with Alix teams re: rebuttal reports (1.8).			
7 November 2025	Call with E. Smith re: discovery (0.3); call with E. Smith and A. Hong re: discovery (0.3); call among review team re: discovery work streams (0.5); call among W&C and Alix re: Sampson deposition (0.6); call with C. West re: First Lien Lenders' discovery (0.1); select documents for Sampson deposition preparation (1.7).	A Chase	3.50	5,530.00
7 November 2025	Draft summary re: S. Kern deposition (1.0); emails with E. Smith and A. Chase re: K. Shepard deposition (0.5); call with B. Kakani re: solvency questions for Shepard deposition (0.4); emails with B. Kakani re: same (0.5); call with J. Bourgault re: Shepard deposition (0.4); call with E. Smith and A. Chase re: deposition workstreams (0.3); emails with E. Smith, B. Kakani, and J. Bourgault re: K. Shepard deposition (0.5); call with E. Smith, A. Chase, and team re: litigation workstreams (0.5); emails with C. West, E. Smith, and A. Chase re: privilege logs (0.5); review privilege logs produced by Debtors, First Lien Lenders, and Q Investments (2.0); review documents re: D. Silvers (2.2).	A Hong	8.80	12,056.00
7 November 2025	Attend call with experts re: valuation report (0.5); prepare deposition materials for D. Silvers (1.9); call with W&C team re: document review (0.5).	A Aquije	2.90	3,219.00
7 November 2025	Prepare for D. Gonzales deposition (0.3); Confer with A. Hong re: K. Shepard deposition (0.4); Prepare for K. Shepard deposition (11.4); Meet with Alix team re: K. Shepard deposition (0.3); Attend follow-up meeting with W&C team (0.3); Meet with W&C team re: discovery task allocations (0.5).	J Bourgault	13.20	11,484.00
7 November 2025	Conduct document review re: investigation (3.0); review expert reports for valuation analysis (0.7).	C Isaac	3.70	3,219.00
7 November 2025	Prepare for corporate designee depositions.	B Kakani	7.40	6,438.00
7 November 2025	Meeting with E. Smith re: case strategy and upcoming depositions (0.5); Review of production re: trade creditor issues and investigation (2.2); Review of litigation claims analyses and documents (1.0); Targeted search for investment memos (1.0).	A Quintana	4.70	4,089.00
7 November 2025	Attend meeting with AlixPartners, A. Chase, and J. Zakia and E. Smith, re: deposition of H. Sampson (0.7); summarize takeaways from meeting (0.3); attend meeting re: document review and active workstreams (0.5); revise outline re: deposition of H. Sampson (4.4).	J Walz	5.90	5,133.00
7 November 2025	Quality control production load MODV_CB_001 and MODV_TB_001 (0.7); create FTP for data uploads; add new users (0.6).	K Chen	1.30	637.00
7 November 2025	Coordinate mailing of deposition exhibits to Veritext	K Wick	3.90	1,911.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.2); coordinate deposition conference room requests (0.2); coordinate printing and deliver of deposition materials (0.7); prepare pdf of excel sheet (2.8).			
8 November 2025	Edits to expert reports (2.2); telephone conferences with W&C team re: same (0.6).	J Shore	2.80	7,000.00
8 November 2025	Review revised expert report (1.1); confer with Alix team re: same (0.5).	J Zakia	1.60	3,520.00
8 November 2025	Telephone conferences to discuss rebuttal reports with Alix team (3.5); line edits to rebuttal reports (3.0); telephone conferences with C. Shore re: edits to rebuttal reports (0.5); revise and coordinate to update deposition outlines with Alix & W&C teams (2.0).	E Smith	9.00	14,670.00
8 November 2025	Analyze privilege logs produced by Debtors, First Lien Lenders, and Q Investments (1.6); email to E. Smith and A. Chase summarizing privilege log issues (0.4); emails with E. Smith, B. Kakani, A. Aquije, J. Bourgault, and K. Wick re: K. Shepard deposition outline (0.6); revise K. Shepard deposition outline (0.9); revise D. Silvers deposition outline (2.9).	A Hong	6.40	8,768.00
8 November 2025	Revise expert report re: Debtors business plan report (3.3); revise deposition outline for C. Schandler (0.4); further revise second expert report re: valuation (1.5).	A Aquije	5.20	5,772.00
8 November 2025	Review Modivcare claims analysis and emails re: same with A. Quintana and A. Aquije (2.0); emails with A. Quintana re: hot documents for the same (1.4).	C Chitwan	3.40	3,774.00
8 November 2025	Prepare for K. Shepard deposition.	J Bourgault	2.10	1,827.00
8 November 2025	Conduct document review searches re: investigation (2.8); review expert reports re: solvency and valuation (3.0).	C Isaac	5.80	5,046.00
8 November 2025	Prepare for corporate designee depositions.	B Kakani	2.40	2,088.00
8 November 2025	Review of litigation claims analyses and documents (2.5); Targeted search for investment memos (2.5).	A Quintana	5.00	4,350.00
8 November 2025	Targeted search of document production.	J Walz	1.00	870.00
8 November 2025	Coordinate printing and delivery of deposition materials.	K Wick	1.10	539.00
9 November 2025	Preparation for K. Shepherd deposition (3.0); attend W&C team telephone conferences re: discovery (0.5); emails with W&C team re: discovery issues (0.4); emails re: contracts (0.5).	J Shore	4.40	11,000.00
9 November 2025	Prepare for Sampson deposition (1.4); review and revise deposition outline (1.7).	J Zakia	3.10	6,820.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 November 2025	Calls re: expert discovery (1.2); line edits to rebuttal report (2.0); correspondence re: witness list and notice to L. Norwalk (0.6); correspondence re: open fact discovery issues (0.5).	E Smith	4.30	7,009.00
9 November 2025	Review email productions in preparation for Silvers deposition (4.4); email among W&C re: same (0.5); email among W&C re: deposition schedule (0.3); review S. Kern deposition transcript (1.9).	A Chase	7.10	11,218.00
9 November 2025	Review valuation rebuttal report.	V Sachdev	1.10	1,562.00
9 November 2025	Emails with J. Walz re: Sampson deposition logistics (0.3); emails with K. Wick re: documents for K. Shepard deposition (0.5); emails with A. Chase, L. Miranda, and W&C Litigation and Practice Technology team re: documents clawed back by First Lien Lenders (0.4); emails with C. Shore, E. Smith, B. Kakani, and J. Bourgault re: K. Shepard deposition outline (0.5); emails with C. West, A. Chase, and L. Miranda re: Silvers deposition (0.5); review documents re: D. Silvers deposition (2.0); emails with B. Kakani and J. Bourgault re: deposition logistics (0.5); review Debtors' amended interrogatory responses (0.4); emails with E. Smith and A. Chase re: Debtors' amended interrogatory responses (0.3); call with C. Shore re: K. Shepard deposition outline (0.1); revise K. Shepard deposition outline (1.2).	A Hong	6.70	9,179.00
9 November 2025	Discussions with A, Quintana re: hot docs for litigation claims analysis.	C Chitwan	0.40	444.00
9 November 2025	Prepare for K. Shepard deposition.	J Bourgault	1.00	870.00
9 November 2025	Prepare for corporate designee depositions.	B Kakani	4.10	3,567.00
9 November 2025	Review of litigation claims analyses and documents and targeted search for investment memos.	A Quintana	2.30	2,001.00
9 November 2025	Coordinate documents and outline for H. Sampson deposition (0.6); Revise H. Sampson deposition materials (2.7); coordination with printing team re: same (0.2).	J Walz	3.50	3,045.00
9 November 2025	Unzip production (0.2); decrypt and extract (0.3); run quality control analysis (0.3); move to staged environment (0.2); prepare for upload (0.2); map metadata fields to Relativity environment (0.3).	G Chemborisov	1.50	735.00
9 November 2025	Coordinate printing and delivery of deposition materials.	K Wick	0.80	392.00
10 November 2025	Monitor Shepherd deposition (5.9); follow up conference call with C. Shore re: revenue projections (0.3); review expert reports (0.4).	S Greissman	6.60	16,500.00
10 November 2025	Preparation for and attend K. Shepherd deposition (8.5); attend telephone conferences with W&C team	J Shore	9.00	22,500.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	re: strategy (0.3); edits to reports (0.1); telephone conferences re: same (0.1).			
10 November 2025	Prepare for deposition of H. Sampson.	J Zakia	4.30	9,460.00
10 November 2025	Commenting on Brown expert report (2.4); and commenting on Magrisi report (0.4).	A Zatz	2.80	5,880.00
10 November 2025	Review valuation report.	C Koster	0.60	1,140.00
10 November 2025	Review rebuttal reports revisions and discussion with Alix teams re: same (4.9); finalize reports for exchange (0.5); assist with Shepard deposition (3.0); meet with W&C litigation team re: deposition preparation (1.2); correspondence to discuss document production with C. Carroll (1.0); review documents for upcoming depositions (1.5).	E Smith	12.10	19,723.00
10 November 2025	Call with E. Smith re: discovery (0.3); call with E. Smith and A. Aquije re: deposition preparation (0.2); email among litigation team re: discovery strategy and workstreams (1.2); review documents from A. Quintana for deposition preparation (0.9).	A Chase	2.60	4,108.00
10 November 2025	Emails with J. Bourgault, B. Kakani, and C. Chitwan re: Shepard deposition logistics (0.5); K. Shepard deposition (2.9); emails with A. Chase, A. Aquije, and B. Kakani re: documents for D. Silvers deposition (0.4); emails with A. Aquije and K. Wick re: preparing exhibits for D. Silvers deposition (0.5); review documents re: D. Silvers (2.5); draft D. Silvers deposition outline (2.5).	A Hong	9.30	12,741.00
10 November 2025	Revise deposition outline for D. Silvers (1.4); call with W&C team re: upcoming deposition preparation (0.2); review and revise expert report (1.3); further revise deposition outline for A. Hong (0.6).	A Aquije	3.50	3,885.00
10 November 2025	Review docs for litigation claims analysis and emails re: same with A. Quintana.	C Chitwan	1.20	1,332.00
10 November 2025	Attend deposition of K. Shepard.	C Chitwan	8.50	9,435.00
10 November 2025	Prepare for K. Shepard deposition (4.0); Second-chair K. Shepard deposition (8.6).	J Bourgault	12.60	10,962.00
10 November 2025	Conduct document review re: investigation.	C Isaac	6.80	5,916.00
10 November 2025	Prepare for corporate designee depositions.	B Kakani	2.90	2,523.00
10 November 2025	Review of board materials for litigation claim valuations (2.0); Review Ken Shepard deposition (2.3); Review of document production for materials relevant (2.4).	A Quintana	6.70	5,829.00
10 November 2025	Coordination re: documents for H. Sampson deposition (0.4); attend K. Shepard Deposition (2.4); prepare documents for H. Sampson deposition (5.0);	J Walz	8.00	6,960.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	discussion with J. Zakia re: same (0.2).			
10 November 2025	Gather information and update production log (0.6); create searches for case team (0.5); remove documents from batch set (0.3); create batch searches(0.2); batch documents for review and provide batch info (0.4); review Committee FTP uploads and confirm with case team on custodian information (0.3); download FTP data (0.2); log and validate data (0.3); data load quality control (0.4); save documents to case team folder (0.3).	K Chen	3.50	1,715.00
10 November 2025	Unzip container (0.1); decrypt and extract (0.1); run quality control analysis (0.3); move to staged environment (0.1); prepare for upload (0.1); map metadata fields to Relativity environment (0.2); upload (0.1).	G Chemborisov	1.00	490.00
10 November 2025	Coordinate deposition materials (0.8); review deposition binder and coordinate printing for J. Walz (0.3); prepare index of deposition binder (1.2); coordinate printing of same (0.3).	K Wick	2.60	1,274.00
11 November 2025	Monitor Sampson deposition (3.4); correspondence with D. Rowe re: Silvers report (0.1); review Silvers report (0.8).	S Greissman	4.30	10,750.00
11 November 2025	Confer with W&C team re: expert reports (0.5); follow-up on H. Sampson deposition (0.5); call with W&C team re: contracts (0.5); review final reports (2.0); review Silvers report (1.1).	J Shore	4.60	11,500.00
11 November 2025	Prepare for and conduct deposition of H. Sampson.	J Zakia	4.30	9,460.00
11 November 2025	Meet and confer with Debtors, First Lien Lenders and Jupiter (0.6); review documents (1.0); assist with Sampson deposition (2.0); review reliance materials from experts (1.0); discuss and draft motion to quash (2.0); prepare for depositions (3.5).	E Smith	10.10	16,463.00
11 November 2025	Call with E. Smith re: discovery (0.4); attend portion of deposition of H. Sampson (1.6).	A Chase	2.00	3,160.00
11 November 2025	Emails with J. Walz and C. Chitwan re: H. Sampson deposition (0.3); review documents re: D. Silvers (1.5); draft D. Silvers deposition outline (2.6); emails with C. West, A. Chase, and L. Miranda re: same (0.2); emails with A. Aquije re: Z. Jamal deposition (0.5).	A Hong	5.10	6,987.00
11 November 2025	Meet with E. Smith re: letter on discovery issues (0.3); prepare letter and research related legal issues (1.6).	P Kates	1.90	2,603.00
11 November 2025	Attend and take notes for complaint on deposition of H. Sampson (1.8); draft section of deposition outline for D. Silvers (2.1); review D. Silvers' declaration re: investigation (0.8); review deposition outline for D. Silvers (0.7); emails with A. Chase and C. West re: same (0.2); call with C. Shore re: D. Silver's deposition	L Miranda	11.20	13,664.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); conduct legal research re: motion to compel discovery (3.6); call with A. Chase re: same (0.2); draft motion to compel re: same (1.7).			
11 November 2025	Prepare deposition materials for L. Norwalk (1.2); call with E. Smith re: same (0.3).	A Aquije	1.50	1,665.00
11 November 2025	Attend deposition of H. Sampson.	C Chitwan	3.50	3,885.00
11 November 2025	Attend Sampson deposition (partial) and review rough transcript (3.4); confer with J. Walz and V. Sachdev re: same (0.2).	G Zahiremami	3.60	3,564.00
11 November 2025	Prepare K. Shepard deposition summary (1.9); Prepare for M. Gonzales deposition (3.6).	J Bourgault	5.50	4,785.00
11 November 2025	Conduct review of document production re: investigation.	C Isaac	6.60	5,742.00
11 November 2025	Review Heath Sampson deposition (2.0); Review of document production for materials relevant (2.4).	A Quintana	4.40	3,828.00
11 November 2025	Prepare for deposition of H. Sampson (2.5); second-chair deposition of H. Sampson (3.8); debrief re: H. Sampson deposition (0.2); review correspondence re: H. Sampson deposition (0.1); draft 1L lenders deposition outline (4.2); discussion with L. Miranda re: same (0.5); review of correspondence re: same (0.1).	J Walz	11.40	9,918.00
11 November 2025	Assist K. Chen with processing request for records EID17518.	S Binuya	0.50	210.00
11 November 2025	Prepare and deliver deposition materials.	K Wick	0.20	98.00
12 November 2025	Conference call with E. Smith re: Gonzalez deposition (0.2); conference call with C. Shore re: same (0.1); correspondence with D. MacGreevey re: LME data (0.1).	S Greissman	0.40	1,000.00
12 November 2025	Conferences with W&C team re: experts (1.0); call and emails with W&C and Alix teams re: discovery issues (0.5).	J Shore	1.50	3,750.00
12 November 2025	Prepare for witness preparation meeting.	J Zakia	2.40	5,280.00
12 November 2025	Review discovery.	C Koster	0.50	950.00
12 November 2025	Document review (4.0); draft deposition outline (4.6); review deposition preparation materials (0.5); review deposition logistics (0.7); review open discovery issues (1.2).	E Smith	11.00	17,930.00
12 November 2025	Meet with E. Smith re: deposition preparation (0.9); review documents to prepare for Silvers deposition (6.3); draft questions for Silvers deposition (2.2); meet with C West re: same (1.1).	A Chase	10.50	16,590.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 November 2025	Emails with A. Chase, L. Miranda, C. Chitwan, and C. Isaac re: D. Silvers deposition (0.5); emails with A. Chase, L. Miranda, and K. Wick re: Silvers deposition documents (0.4); review new board resolutions produced by Debtors (0.6); emails with A. Chase and L. Miranda re: same (0.5); emails with C. West, A. Chase, C. Chitwan, and C. Isaac re: additional exhibits for Silvers deposition (0.4); review additional exhibits for Silvers deposition (0.6); emails with C. Chitwan and C. Isaac re: Silvers deposition logistics (0.5).	A Hong	3.50	4,795.00
12 November 2025	Research and draft letter re: discovery and Committee.	P Kates	4.10	5,617.00
12 November 2025	Confer with E. Smith re: deposition notices.	J Yoo	0.30	411.00
12 November 2025	Draft motion to compel discovery (2.3); email with A. Chase re: same (0.2); review documents from C. Shandler deposition (0.9).	L Miranda	3.40	4,148.00
12 November 2025	Research 1L lender issues (0.7); Conduct document review for 1L production (3.4); Prepare for D. Gonzales deposition (11.2).	J Bourgault	15.30	13,311.00
12 November 2025	Prepare for November 13 deposition by preparing exhibits and coordinating with concierge and other teams.	C Isaac	6.20	5,394.00
12 November 2025	Targeted search for first lien lender production (1.8); Review of document production for materials relevant (1.2).	A Quintana	3.00	2,610.00
12 November 2025	Correspondence with W&C team re: active discovery workstreams (0.3); draft outline for deposition of K. Glodowski (12.8); discussion with E. Smith, A. Chase, and J. Bourgault re: same (0.6); coordination re: logistics for Monday's deposition of K. Glodowski (0.2).	J Walz	13.90	12,093.00
12 November 2025	Prepare searches for case team (0.5); set up new ftp site for data upload (0.3) create user groups and add users (0.3); add more ftp users (0.3).	K Chen	1.40	686.00
12 November 2025	Assist with setting up requested searches (0.3); batch out document populations (0.2); set up SFTP site (0.5).	G Chemborisov	1.00	490.00
12 November 2025	Coordinate deposition materials (0.4); update deposition binders (1.9); coordinate deposition logistics (0.3).	K Wick	2.60	1,274.00
13 November 2025	Monitor D. Silvers deposition.	S Greissman	4.80	12,000.00
13 November 2025	Prepare for and participate in expert preparation meeting.	J Zakia	1.90	4,180.00
13 November 2025	Calls to discuss open discovery issues with Jupiter & Madison Ave (0.5); draft letter brief (1.3); prepare for deposition (4.5); draft outline (4.5); calls to discuss deposition outline with J. Bourgault (0.5); assist with D.	E Smith	12.70	20,701.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Silvers deposition (1.4).			
13 November 2025	Prepare for Silvers deposition (0.8); attend Silvers deposition (9.1).	A Chase	9.90	15,642.00
13 November 2025	Revise Silvers deposition outline (1.9); emails with C. West and A. Chase re: Silvers deposition outline (0.3); emails with L. Miranda, C. Chitwan, and team re: deposition logistics (0.4); review additional documents for Silvers deposition (0.5); emails with K. Wick re: additional documents for Silvers deposition (0.5); emails with E. Smith and P. Kates re: draft letter to Debtors re: deposition notices (0.5); confer with P. Kates re: same (0.1); revise draft letter to Debtors re: deposition notices to Committee members (0.9); emails with A. Aquije re: Z. Jamal deposition (0.5); draft questions re: new exhibit for D. Silvers deposition (0.5); emails with A. Chase and L. Miranda re: same (0.1); confer with C. West, A. Chase, and L. Miranda re: Silvers deposition (0.5); emails with E. Smith, A. Chase, L. Miranda, and AlixPartners team re: Shandler and Jamal depositions (0.4); review documents for Z. Jamal deposition (2.5).	A Hong	9.60	13,152.00
13 November 2025	Research limitations on discovery for letter.	P Kates	1.40	1,918.00
13 November 2025	Draft letter re: deposition notices (1.7); confer with E. Smith re: same (0.2).	J Yoo	1.90	2,603.00
13 November 2025	Attend and take notes for complaint on deposition of D. Silvers (partial) (3.8); meet with A. Quintana and A. Hong re: deposition of L. Norwalk (0.6); email with A. Quintana re: same (0.1); confer with C. Chitin re: same (0.2).	L Miranda	4.70	5,734.00
13 November 2025	Review diligence re: deposition preparation for Z. Jamal.	A Aquije	2.00	2,220.00
13 November 2025	Prepare for 1L deposition (9.6); Prepare for D. Gonzales deposition (2.2).	J Bourgault	11.80	10,266.00
13 November 2025	Conduct targeted document review re: upcoming deposition (5.0); draft deposition outline (1.5).	C Isaac	6.50	5,655.00
13 November 2025	Meeting with E. Smith and A. Case to discuss Leslie Norwalk deposition strategy (0.3); preparations for Dan Silvers deposition (1.4); Preparing Leslie Norwalk deposition outline and investigating related document production (7.1).	A Quintana	8.80	7,656.00
13 November 2025	Draft outline for deposition of K. Glodowski.	J Walz	9.90	8,613.00
13 November 2025	Remove documents from batch set (0.4); create batch search (0.2); batch documents for review and provide batch info to case team (0.3).	K Chen	0.90	441.00
13 November 2025	Assist with setting up requested searches (0.6); Adjust document access permission settings (0.4).	G Chemborisov	1.00	490.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 November 2025	Correspondence with W&C team re: deposition materials (0.3); review printed deposition materials (1.8); coordinate exhibits shipment for Veritext (0.3).	K Wick	2.40	1,176.00
14 November 2025	Monitor D. Mounts-Gonzalez deposition.	S Greissman	5.50	13,750.00
14 November 2025	Prepare for deposition (3.7); confer with experts re: Debtors' information request, draft and revise response to same (0.9).	J Zakia	4.60	10,120.00
14 November 2025	Prepare for deposition and take deposition of David Mounts Gonzalez (10.0); meetings to prepare for and discuss the outline and documents for Norwalk (2.0); calls with J. Yoo re: letter brief (1.0).	E Smith	13.00	21,190.00
14 November 2025	Confer among W&C re: D. Mounts Gonzales deposition (0.6); attend portion of D. Mounts Gonzales deposition (1.3); revise letter re: Silvers declaration (3.5); confer with L. Miranda re: Debtors' document production (0.3).	A Chase	5.70	9,006.00
14 November 2025	Revise L. Norwalk deposition outline (0.7); emails with A. Quintana re: same (0.3); review documents re: Kirkland bankruptcy lawyer (0.5); emails with A. Chase and L. Miranda re: same (0.2); review letter produced by Debtors re: David Mounts Gonzales deposition (0.4); emails with A. Chase and L. Miranda re: same (0.2); review Z. Jamal expert report (1.9); review documents pulled for Z. Jamal deposition (1.9); review summary from J. Bourgault re: D. Gonzales deposition (0.4); emails with L. Miranda and J. Bourgault re: same (0.1).	A Hong	6.60	9,042.00
14 November 2025	Revise letter re: deposition notices (2.6); conduct research in support of letter re: deposition notices (0.6); confer with W&C team re: same (0.3).	J Yoo	3.50	4,795.00
14 November 2025	Attend partially and take notes for complaint on deposition of D. Mounts Gonzales (3.2); call with E. Smith and A. Chase re: same (0.2); call with E. Smith re: same (0.1); conference with A. Chase re: same (0.4).	L Miranda	3.90	4,758.00
14 November 2025	Review diligence re: deposition preparation for Z. Jamal.	A Aquije	2.40	2,664.00
14 November 2025	Prepare for D. Gonzales deposition (1.7); Second-chair D. Gonzales deposition (6.5); Prepare D. Gonzales deposition summary (2.4); Prepare for 1L deposition (2.1).	J Bourgault	12.70	11,049.00
14 November 2025	Conduct targeted document review for deposition (5.0); draft and review deposition outline (6.0).	C Isaac	11.00	9,570.00
14 November 2025	Preparing Leslie Norwalk deposition outline and investigating related document production (7.0); preparing Leslie Norwalk deposition outline and investigating related document production re: Sixth	A Quintana	9.30	8,091.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Amendment and Audit Committee notes (2.3).			
14 November 2025	Prepare documents and draft outline for Glodowski deposition.	J Walz	3.40	2,958.00
14 November 2025	Correspondence with W&C team re: deposition logistics (0.1); correspondence with C. Issac re: printing materials (0.1).	K Wick	0.20	98.00
15 November 2025	Prepare for Shandler deposition (1.3); review potential exhibits (1.0).	J Zakia	2.30	5,060.00
15 November 2025	Review documents and prepare for and assist with first lien lender deposition (2.0); review documents and prepare for Norwalk deposition (2.0).	E Smith	4.00	6,520.00
15 November 2025	Further revise letter re: Silvers declaration (1.1); email among W&C re: Norwalk deposition (0.3).	A Chase	1.40	2,212.00
15 November 2025	Review documents to draft deposition outline for C. Shandler's deposition (4.3); draft outline for C. Shandler's depositions (4.4); email with Quinn Emanuel re: sealed motion (0.2); email with W&C re: same (0.1); conference with A. Hong re: sealing and depositions (0.2); review pleadings to prepare for C. Shandler's depositions (2.4); email with J. Zakia re: C. Shandler's deposition (0.4).	L Miranda	12.00	14,640.00
15 November 2025	Revise L. Norwalk deposition outline and exhibits (0.9); email re: same with E. Smith (0.1); emails with K. Wick and E. Smith re: preparation for deposition of L. Norwalk (0.4).	C Chitwan	1.40	1,554.00
15 November 2025	Prepare for 1L deposition (1.7); Prepare for L. Norwalk deposition (1.1); Prepare for C. Shandler deposition (3.3).	J Bourgault	6.10	5,307.00
15 November 2025	Prepare index of deposition materials (1.8); coordinate printing and delivery of same (0.3).	K Wick	2.10	1,029.00
16 November 2025	Draft U.S. Trustee correspondence re: D. Mounts-Gonzalez and Committee communication.	S Greissman	0.70	1,750.00
16 November 2025	Edits to letter to Quinn (0.3); follow-up with W&C team on deposition (0.4); edits to Committee deposition letter (0.3); call with W&C team re: discovery (0.9).	J Shore	1.90	4,750.00
16 November 2025	Participate in all hands call re: workstreams (1.0); call with litigation team to discuss next steps (0.4); review documents and prepare outline for L. Norwalk deposition (5.0); revise letter brief and discuss with C. Carroll (0.6); answer questions re: first lien deposition preparation (0.4).	E Smith	7.40	12,062.00
16 November 2025	Call among W&C litigation team re: discovery work streams (0.4); assist C. West with preparation for First Lien Lender deposition (0.7).	A Chase	1.10	1,738.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
16 November 2025	Review documents flagged for Z. Jamal deposition (2.4); emails with A. Aquije re: same (0.3); draft outline for Z. Jamal deposition (2.1).	A Hong	4.80	6,576.00
16 November 2025	Revise draft letter to Debtors re: depositions (2.1); attend W&C associates call re: discovery (0.4).	J Yoo	2.50	3,425.00
16 November 2025	Prepare Shandler deposition questions re: Excluded Assets.	R Beil	0.50	640.00
16 November 2025	Draft outline for C. Shandler's deposition (4.8); review documents re: same (3.8); attend call with W&C re: discovery workstreams (0.3); emails with C. West re: deposition of first lien lenders (0.3); conference with A. Chase re: same (0.2); email to E. Smith re: diligence (0.2); email with Debevoise re: sealed motions (0.1).	L Miranda	9.70	11,834.00
16 November 2025	Further revise deposition materials for Z. Jamal.	A Aquije	1.20	1,332.00
16 November 2025	Prepare for C. Shandler deposition (4.5); Prepare for L. Norwalk deposition (6.2); Cite check Quinn letter (1.4).	J Bourgault	12.10	10,527.00
16 November 2025	Conduct research re: discovery obligations.	C Isaac	3.80	3,306.00
16 November 2025	Prepare documents and outline for K. Glodowski deposition from.	J Walz	13.40	11,658.00
17 November 2025	Correspondence with E. Smith re: deposition status (0.1); conference call with J. Zakia re: U.S Trustee correspondence (0.3); monitor 1L representative deposition (1.5); monitor Norwalk deposition (1.5).	S Greissman	3.40	8,500.00
17 November 2025	Edits to letters re: discovery (0.5); calls with W&C and Alix teams re: deposition (0.7); emails with W&C and Alix teams re: Mounts Gonzales deposition (0.5); preparation for depositions (2.0); review production materials (2.8).	J Shore	6.50	16,250.00
17 November 2025	Prepare for C. Shandler deposition (2.7); review and revise draft letter to US Trustee confer with S. Greissman and C. Shore re: same (0.8).	J Zakia	3.50	7,700.00
17 November 2025	Reviewing discovery e-mails.	A Zatz	0.20	420.00
17 November 2025	Review discovery dispute (0.4); emails re: same (0.3).	C Koster	0.70	1,330.00
17 November 2025	Review documents and prepare for deposition of L. Norwalk (5.0); take deposition of L Norwalk (6.0); calls re: letter re: depositions and discovery to Jupiter and Madison (1.0); review and finalize letter and send to counsel (0.2).	E Smith	12.20	19,886.00
17 November 2025	Attend deposition of First Lien Lenders (8.2); review and revise letter re: Debtors' document production (0.9).	A Chase	9.10	14,378.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
17 November 2025	Emails with L. Miranda, C. Chitwan, and A. Quintana re: deposition logistics (0.9); emails with A. Aquije and K. Wick re: Z. Jamal deposition outline and documents (0.9); review documents re: Z. Jamal (1.7); draft Z. Jamal outline re: designated corporate designee topics (2.5); review questions from J. Amico re: Jamal deposition (0.5); emails with J. Amico re: Jamal deposition questions (0.3); email to C. Shore re: Jamal deposition (0.2); review Jamal expert report (1.5); draft Z. Jamal deposition outline sections re: valuation and expert report (2.0).	A Hong	10.50	14,385.00
17 November 2025	Revise letter re: deposition notices (0.9); confer with W&C team re: same (0.1); review research in support of discovery letter (0.4); confer with W&C team re: discovery letter (0.2); revise discovery letter (0.9).	J Yoo	2.50	3,425.00
17 November 2025	Draft outline for C. Shandler's deposition (1.3); email with J. Zakia re: same (0.2); attend and take notes for deposition of First Lien Lenders (partial) (5.2); review research re: discovery rules in Fifth Circuit (1.4); emails with W&C re: same (0.7): conduct follow-up legal research re: same (2.6); draft letter to Latham re: discovery issues (3.1); revise letter to Latham with comments by A. Chase (0.4).	L Miranda	14.90	18,178.00
17 November 2025	Further draft deposition materials for A. Hong.	A Aquije	2.50	2,775.00
17 November 2025	Attend deposition of L. Norwalk (6.1); coordinate with Veritext and W&C office for upcoming depositions of C. Shandler and Z. Jamal (0.8); review hearing transcripts re: discovery matters (0.8); emails with L. Miranda re: same (0.1); draft key takeaways from deposition of L. Norwalk (1.1); email re: same with A. Hong and J. Bourgault (0.1); email re: same with E. Smith (0.1).	C Chitwan	9.10	10,101.00
17 November 2025	Prepare for C. Shandler deposition (4.1); Prepare for L. Norwalk deposition (0.8); Second-chair L. Norwalk deposition (6.1); Assist with document production letter (0.5); Review L. Norwalk deposition summary (0.8).	J Bourgault	12.30	10,701.00
17 November 2025	Conduct research re: discovery obligations.	C Isaac	4.10	3,567.00
17 November 2025	Researching cases re: document protocol disputes and discovery tactics.	A Quintana	1.60	1,392.00
17 November 2025	Prepare documents for deposition of K. Glodowski (2.3); Second-chair deposition of K. Glodowski (8.3); debrief deposition (0.1).	J Walz	10.70	9,309.00
17 November 2025	Prepare deposition materials (3.4); coordinate printing and delivery of same (0.4).	K Wick	3.80	1,862.00
17 November 2025	Prepare deposition materials for binder.	M McNary	1.20	504.00
18 November 2025	Review valuation reports (0.5); review litigation letter re: Silvers report (0.7); review litigation letter re:	S Greissman	2.90	7,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	discovery dispute (0.6); conference call with C. Shore re: same and U.S Trustee correspondence (0.5); draft U.S. Trustee correspondence (0.6).			
18 November 2025	Preparation for Jamal deposition (2.1); calls with W&C and Alix teams re: Shandler deposition (0.8); expert preparation (0.4); review production materials (2.7); further edits to Quinn letter (0.4).	J Shore	6.40	16,000.00
18 November 2025	Prepare for C. Shandler deposition (2.4); confer with expert and team re: Debtors information request (0.5); review and revise email to Latham re: same (0.2).	J Zakia	3.10	6,820.00
18 November 2025	Review letter to Quinn Emanuel (0.4); review letter to Latham (0.4).	C Koster	0.80	1,520.00
18 November 2025	Meeting with L. Miranda and C. Shore to discuss letter re: David Mounts Gonzalez documents and other open discovery issues (2.0); work with Alix Partners on open discovery (2.5); deposition preparation and report review (5.0).	E Smith	9.50	15,485.00
18 November 2025	Meet with E. Smith and L. Miranda re: discovery (1.0); review and revise letter to Debtors re: document production (1.4); email among W&C re: document review (0.6); email among litigation team re: litigation pretrial workstreams (2.8); confer with L. Miranda re: same (0.8).	A Chase	6.60	10,428.00
18 November 2025	Draft Z. Jamal deposition outline (0.5); emails with C. Shore, E. Smith, and A. Chase re: Z. Jamal deposition (0.5); emails with R. Komendwoski re: Jamal deposition (0.5); emails with J. Zakia, E. Smith, A. Panda, and G. Magrisi re: reliance materials for Magrisi report (0.5); call with E. Smith re: Magrisi reliance materials (0.1); review questions from AlixPartners re: Jamal expert report (0.8); revise Z. Jamal deposition outline per Alix comments (1.5); emails with A. Aquije and K. Wick re: documents for Z. Jamal deposition (0.9); review additional documents flagged re: Z. Jamal (1.7); emails with E. Smith and A. Chase re: Jamal outline (0.4); further revise Z. Jamal outline per C. Shore comments (2.0); emails with E. Smith, C. Chitwan, and J. Bourgault re: Norwalk deposition (0.4).	A Hong	9.80	13,426.00
18 November 2025	Meet with A. Chase re: discovery and trial preparation (0.8); meet with A. Chase and E. Smith re: same (1.0); follow-up meeting with E. Smith re: depositions (0.5); revise letter to Latham re: discovery (various iterations) (2.9); meet with C. Shore re: same (0.2); revise outline for C. Shandler deposition (1.2); review diligence re: same (1.6); email with J. Zakia re: same (0.2); email with Alix re: same (0.2); email to Latham re: letter on discovery (0.1); revise work streams for trial (0.2); email with A. Chase re: same (0.1).	L Miranda	9.00	10,980.00
18 November 2025	Call with E. Smith re: upcoming depositions (0.2); prepare materials re: same (0.4); coordinate deposition line re: same (0.3).	A Aquije	0.90	999.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 November 2025	Assist team with upcoming depositions of C. Shandler, Z. Jamal and expert witnesses and emails re: same with Veritext (1.3); review deposition exhibits and emails with Veritext and L. Miranda re: same (0.9); review documents and emails re: same with L. Miranda (2.4).	C Chitwan	4.60	5,106.00
18 November 2025	Conduct review of document production re: Investigation.	C Isaac	3.50	3,045.00
18 November 2025	Review of MODV Board minutes from July and August of 2025.	A Quintana	0.40	348.00
18 November 2025	Identify relevant exhibits from yesterday's deposition of K. Glodowski (0.3); review deposition transcript of K. Glodowski for key points (0.8); draft summary of certain key takeaways for team (0.2).	J Walz	1.30	1,131.00
18 November 2025	Coordinate printing of deposition documents (0.7); edit and prepare deposition binders (1.3); prepare binders of discovery documents for E. Smith (3.2); coordinate printing of same (0.2).	K Wick	5.40	2,646.00
19 November 2025	Monitor C Shandler deposition (0.9); conference call with C. Shore re: D. Silver deposition, litigation correspondence, U.S Trustee correspondence and confirmation brief (0.6); draft U.S Trustee correspondence and Schrock cover email (0.7); pre-call re: meet and confer among W&C team (0.5); meet and confer with Latham, Quinn Emanuel and Paul Hastings teams (0.9).	S Greissman	3.60	9,000.00
19 November 2025	Preparation for Jamal deposition (3.9); review reports and expert preparation (1.8); follow up with W&C team on Shandler and Mounts Gonzales deposition (1.0); meet and confer with opposing counsel (0.5).	J Shore	7.20	18,000.00
19 November 2025	Prepare for and conduct Shandler deposition (9.3); prepare for M. Brown deposition (2.1); confer with C. Shore re: litigation strategy (0.8).	J Zakia	12.20	26,840.00
19 November 2025	Attending meet & confer with opposing counsel.	A Zatz	0.80	1,680.00
19 November 2025	Attend meet and confer meeting with opposing counsel (0.7); telephone internal with W&C team re: same (0.3).	C Koster	1.00	1,900.00
19 November 2025	Assist with Shandler deposition (3.0); prepare for and participate in meet and confer (1.0); review documents (3.0); prepare for deposition (4.0).	E Smith	11.00	17,930.00
19 November 2025	Call among litigation team re: pretrial work streams (0.5); attend portion of Shandler deposition (1.7); call among W&C re: pretrial conference (0.5); meet and confer among all parties (0.8); meet with C. West re: pretrial work streams (0.9); designate B. Gutierrez testimony (3.1); confer with J. Bourgault re: Debtors' production (0.4).	A Chase	7.90	12,482.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 November 2025	Emails with K. Wick re: exhibits for Z. Jamal deposition (0.6); emails with R. Komendwoski and C. Rubel re: Jamal deposition (0.3); review Disclosure Statement re: valuation analysis (0.5); emails with C. Shore and K. Wick re: additional documents for Jamal deposition (0.4); compile additional documents for Z. Jamal deposition (0.5); emails with L. Miranda and C. Chitwan re: deposition logistics (0.5); emails with K. Wick re: additional documents for Jamal deposition (0.5); call with C. Shore re: Z. Jamal deposition (0.1); emails with A. Aquije re: Z. Jamal prior expert testimony (0.6); docket research re: Z. Jamal prior expert testimony (1.5); confer with A. Aquije re: same (0.4); review Z. Jamal prior expert testimony (2.0); emails with C. Shore, R. Komendwoski, C. Rubel, and J. Amico re: same (0.5); call with C. Shore, C. West, E. Smith, A. Chase, and L. Miranda re: issues for meet and confer with Debtors (0.5); meet and confer with Debtors' counsel (0.6); call with C. Shore, R. Komendwoski, C. Rubel, and J. Amico re: Jamal deposition (0.3); emails with C. Shore, L. Miranda, and K. Wick re: Z. Jamal deposition documents and logistics (0.5); Strategy call with A. Chase, J. Yoo, L. Miranda, A. Quintana, C. Chitwan, J. Walz, and J. Bourgault re: litigation workstreams (0.5).	A Hong	10.80	14,796.00
19 November 2025	Attend internal W&C strategy call re: meet and confer (0.5); attend meet and confer (0.5).	J Yoo	1.00	1,370.00
19 November 2025	Attend and second chair deposition of C. Shandler (6.1); meet with J. Zakia re: same (1.2); prepare for deposition re: same (1.1); attend call with Latham, Quinn Emanuel and Paul Hastings re: discovery and pretrial preparation (0.8); attend pre call with W&C re: same (0.5).	L Miranda	9.70	11,834.00
19 November 2025	Prepare deposition materials for Z. Jamal (0.8); research re: same (0.8).	A Aquije	1.60	1,776.00
19 November 2025	Call on pending matters with W&C litigation team (A. Chase, L. Miranda, J. Walz, A. Quintana, J. Yoo, A. Aquije, A. Hong and J. Bourgault) (0.5); assist team with deposition of C. Shandler and Z. Jamal and emails with Veritext re: same (2.6).	C Chitwan	3.10	3,441.00
19 November 2025	Conduct review of document production re: Investigation (1.0); prepare trial documents (2.8).	C Isaac	3.80	3,306.00
19 November 2025	Researching re: witness's deposition designation (1.9); call with A. Chase re: litigation work flow and deposition designation strategy (0.5).	A Quintana	2.40	2,088.00
19 November 2025	Call with litigation team re: litigation work streams.	J Walz	0.50	435.00
19 November 2025	Quality control production load MODV_020 and release to case team with production summary (0.7); workspace management (0.3); update production log (0.2).	K Chen	1.20	588.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 November 2025	Review printed deposition materials (0.2); confer with L. Miranda re: same (0.1); coordinate Jamal deposition logistics (0.2); update Jamal deposition materials (0.8); coordinate printing of same (0.8); coordinate shipment of deposition exhibits to Veritext (0.2); coordinate updates to Jamal deposition materials (0.3).	K Wick	2.60	1,274.00
20 November 2025	Monitor Z. Jamal deposition (3.7); conference call with Committee member (Madison) counsel re: deposition (0.3); internal conference with E. Smith re: discovery (0.2); post deposition follow up with C. Shore (0.5); correspondence with R. Schrock re: U.S. Trustee Letter (0.1); revise correspondence to U.S. Trustee and cover email (0.8); internal office conference with J. Zakia re: same (0.6); internal office conference with C. Shore re: same (0.2).	S Greissman	6.40	16,000.00
20 November 2025	Prepare for Jamal deposition (0.5); attend Jamal deposition (7.5); follow-up with W&C team for same (0.5).	J Shore	8.50	21,250.00
20 November 2025	Prepare for and participate in G. Magrisi deposition preparation meeting (2.6); prepare for and participate in M. Brown deposition preparation meeting (1.8); review and revise letter to Debtors' counsel, confer with S. Greissman re: same (0.2); review expert discovery issues (0.5).	J Zakia	5.10	11,220.00
20 November 2025	Assist with Jamal deposition (1.1); meet with M. Brown & R. Komendowski (2.0) and discuss Brown deposition with J. Zakia (0.5); review discovery disputes (2.0); meet with G. Magrisi (3.5); prepare for deposition and cross (3.0).	E Smith	12.10	19,723.00
20 November 2025	Attend portion of Z. Jamal deposition (2.4); discuss discovery with C. West (0.4); confer with litigation team re: deposition designations (0.5); begin designation of Glodowski deposition (1.1).	A Chase	4.40	6,952.00
20 November 2025	Emails with L. Miranda, C. Chitwan, and K. Wick re: Z. Jamal deposition documents and logistics (0.5); emails with E. Smith and A. Panda re: support for Magrisi report (0.2); confer with E. Smith re: Magrisi report materials (0.2); attend Z. Jamal deposition (8.5); emails with Alix team re: Jamal deposition (0.2); confer with L. Miranda and K. Wick re: deposition logistics (0.3); draft summary re: deposition issues (0.5).	A Hong	10.40	14,248.00
20 November 2025	Attend and second chair deposition of Z. Jamal (8.5); prepare for deposition re: same (1.3).	L Miranda	9.80	11,956.00
20 November 2025	Participate in deposition preparation with M. Brown (3.0); further prepare for expert deposition, assisting E. Smith (1.7).	A Aquije	4.70	5,217.00
20 November 2025	Attend deposition of Z. Jamal.	C Chitwan	8.10	8,991.00
20 November 2025	Draft cross examination outline for D. Silvers (1.1); review recent case filings (0.2); review	J Walz	1.50	1,305.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	correspondence re: same (0.1); discuss active workstreams with C. Chitwan (0.1).			
20 November 2025	Correspondence with L. Miranda, A. Hong and C. Charu re: deposition materials (0.2); review deposition exhibits (0.1); coordinate mailing of exhibits to Veritext (0.3).	K Wick	0.60	294.00
21 November 2025	Monitor Brown deposition (2.8); internal office conference re: discovery (0.3).	S Greissman	3.10	7,750.00
21 November 2025	Calls re: depositions.	J Shore	0.40	1,000.00
21 November 2025	Defend M. Brown deposition (6.8); follow up discussion with W&C team re: same (0.4).	J Zakia	7.20	15,840.00
21 November 2025	Emails re: discovery.	C Koster	0.30	570.00
21 November 2025	Assist in defending deposition of M. Brown (7.0); calls and correspondence re: deposition workstreams with litigation team (1.5); calls and correspondence with AlixPartners team re: deposition workstreams (1.0).	E Smith	9.50	15,485.00
21 November 2025	Call among W&C re: discovery (0.3); email among W&C re: Committee member discovery (0.4); review Mounts Gonzales deposition transcript (4.8); review summaries of depositions from L. Miranda (0.7).	A Chase	6.20	9,796.00
21 November 2025	Draft summary of B. Gutierrez, S. Kern, and D. Silvers depositions (1.5); confer with E. Smith and L. Miranda re: Brown report issue (0.5); call with C. Shore, J. Zakia, E. Smith, A. Chase, and litigation team re: workstreams (0.3); review transcript from Z. Jamal deposition (1.2).	A Hong	3.50	4,795.00
21 November 2025	Draft summary of depositions of C. Shandler and J. Zul for W&C (1.6); review summaries of all depositions re: same (0.9); email with J. Walz re: same (0.2); confer with A. Hong re: same (0.2); confer with E. Smith re: deposition of M. Brown (0.3); email to A. Zatz re: deposition summaries (0.1); revise notes on meet and confer with Latham, Paul Hastings and Quinn re: trial and discovery (0.4); call with W&C re: discovery issues and letter to court (0.3); follow-up call with W&C litigation team re: same (0.3); call with E. Smith re: same (0.1); email with C. Chitwan and A. Chase re: letter to court (0.2); review draft letter to Court re: D. Silver's report (0.6); review same (1.2).	L Miranda	6.40	7,808.00
21 November 2025	Attend M. Brown deposition (6.6); condense notes re: same (0.4); follow up with W&C team re: litigation workstreams (0.3).	A Aquije	7.30	8,103.00
21 November 2025	Call on pending matters with L. Miranda, A. Chase, J. Yoo and E. Smith (0.3); follow-on call with E. Smith, A. Chase, L. Miranda, C. West, C. Shore and other W&C team members (0.4).	C Chitwan	0.70	777.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
21 November 2025	Conference call with E. Smith, A. Chase, and W&C team re: deposition analysis.	C Isaac	0.30	261.00
21 November 2025	Meeting with J. Zakia and E. Smith re: deposition outcomes and litigation strategy.	A Quintana	0.30	261.00
21 November 2025	Summarize takeaways of certain depositions (0.5); attend call with W&C team re: litigation workstreams (0.5).	J Walz	1.00	870.00
21 November 2025	Unzip container (0.1); decrypt and extract (0.1); run quality control analysis (0.3); move to staged environment (0.1); prepare for upload (0.1); map metadata fields to Relativity environment (0.2); upload (0.1).	G Chemborisov	1.00	490.00
22 November 2025	Calls re: deposition workstreams.	E Smith	0.70	1,141.00
22 November 2025	Draft summary of S. Kern deposition testimony topics (0.5); emails with E. Smith and J. Yoo re: expert reliance materials (0.2).	A Hong	0.70	959.00
22 November 2025	Attend W&C team call re: litigation workstreams (0.9); confer with W&C team re: privilege research (0.4).	J Yoo	1.30	1,781.00
22 November 2025	Revise letter to Court re: D. Silver's report and discovery (1.8); conduct legal research re: privilege waiver (1.2); review research by C. Chitwan re: same (0.9); email with A. Chase re: same (0.1).	L Miranda	4.00	4,880.00
22 November 2025	Call on pending litigation matters with C. Shore. J. Zakia, C. West, E. Smith, L. Miranda, J. Walz, A. Hong, J. Yoo and J. Bourgault (0.9); research cases for waiver of attorney client privilege and share with L. Miranda (6.6); emails on pending matters with L. Miranda (0.2); discussions on exhibits with J. Yoo and K. Wick (0.7).	C Chitwan	8.40	9,324.00
22 November 2025	Attend discovery strategy meeting (1.0); Prepare L. Norwalk deposition designations (1.4); Draft deposition designation cover sheet (1.0); Prepare K. Shepard cross binder (1.3); Pull deposition testimony for prior transaction (1.4).	J Bourgault	6.10	5,307.00
22 November 2025	Attend call with litigation team.	J Walz	1.00	870.00
22 November 2025	Download 3 received productions (0.5); validate, log and stage production data (0.5); confirm custodians with case team (0.3); process, export and load productions to Relativity (0.9); quality control data loads (0.4); release productions to case team with summary (0.3).	K Chen	2.90	1,421.00
23 November 2025	Review Jupiter discovery dispute.	S Greissman	0.80	2,000.00
23 November 2025	Review deposition transcripts for use in papers and designations (5.0); review expert reports for deposition	E Smith	7.80	12,714.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(2.0); calls and correspondence re: depositions (0.8).			
23 November 2025	Review Alix's expert reports (0.9); redact expert reports for confidential information (2.2); conduct research re: waiver of privilege (1.4); review research by C. Chitwan re: same (0.8); revise letter to Court re: D. Silvers' report with comments from C. West (2.4); email with A. Chase re: same (0.2).	L Miranda	7.90	9,638.00
23 November 2025	Prepare K. Shepard cross binder (0.2); Pull deposition testimony for prior transaction (0.9); Pull deposition testimony for potential litigation claims (0.4); Pull deposition testimony for Plan objection (2.7).	J Bourgault	4.20	3,654.00
23 November 2025	Draft deposition designations.	C Isaac	2.10	1,827.00
23 November 2025	Research for letter brief re: D. Silvers' report (2.5); prepare exhibit list for confirmation hearing (0.3).	B Kakani	2.80	2,436.00
23 November 2025	Unzip container (0.1); decrypt and extract (0.1); run quality control analysis (0.3); move to staged environment (0.1); prepare for upload (0.1); map metadata fields to Relativity environment (0.2); upload (0.1).	G Chemborisov	1.00	490.00
24 November 2025	Monitor Brown deposition [intermittent] (1.5); conference call with R. Schrock re: discovery (0.2); correspondence with Latham team re: discovery (0.2); conference call with A. O'Brien re: Jupiter issues and discovery (0.5); review Jamal and Mounts-Gonzalez deposition transcripts (1.4); correspondence with Madison counsel re: deposition (0.1); correspondence with E. Smith re: discovery (0.1); conference call with E. Smith re: discovery (0.2).	S Greissman	4.20	10,500.00
24 November 2025	Prepare for and defend Magrisi deposition.	J Zakia	8.30	18,260.00
24 November 2025	Assist with G. Magrisi deposition (8.0); calls re: discovery and discovery disputes (1.4).	E Smith	9.40	15,322.00
24 November 2025	Email with E. Smith and J. Yoo re: deposition designations (0.6); call with J. Yoo re: discovery (0.2).	A Chase	0.80	1,264.00
24 November 2025	Emails with A. Chase, L. Miranda re: litigation workstreams (0.3); draft topic summary re: B. Gutierrez deposition testimony (0.9); emails with A. Chase and J. Yoo re: same (0.2); emails with E. Smith re: document for Magrisi deposition (0.2); prepare additional document for Magrisi deposition (0.2); review supplemental declaration of D. Silvers re: investigation (0.4); review response to Silvers report issue (0.4).	A Hong	2.60	3,562.00
24 November 2025	Attend meeting re: Jupiter deposition (0.6); confer with E. Smith re: depositions (0.2); confer with W&C team re: depositions (0.3).	J Yoo	1.10	1,507.00
24 November 2025	Revise letter to Court re: Silvers' report with comments	L Miranda	5.50	6,710.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	from C. Shore (1.3); incorporate comments from C. West to letter (2.1); review exhibits to letter re: same (0.7); revise letter to Court re: same (various iterations) (0.4); review letter for filing (0.3); confer with A. Chase and C. West re: letter to Court re: Silvers' Report (0.4); revise exhibits for filing re: same (0.3).			
24 November 2025	Attend and run bridge line for expert deposition (7.6); review deposition transcripts for expert depositions re: citations for plan objection (2.5).	A Aquije	10.10	11,211.00
24 November 2025	Assist L. Miranda with finalization of letter re: Silvers declaration (0.4); emails with L. Miranda and W&C team re: deposition of D. Rowe (0.4).	C Chitwan	0.80	888.00
24 November 2025	Conduct targeted document review.	J Bourgault	0.60	522.00
24 November 2025	Update letter brief re: Silvers' investigation report (1.8); prepare exhibits and witness list for confirmation hearing (5.2).	B Kakani	7.00	6,090.00
24 November 2025	Draft summary of selected testimony for J. Zakia (0.3); draft cover letter for K. Glodowski deposition (1.7).	J Walz	2.00	1,740.00
24 November 2025	Provide document review support.	T Chen	0.40	196.00
24 November 2025	Assist with uploading received sets into Relativity (0.5); map met data fields (0.3); run quality control checks (0.2).	G Chemborisov	1.00	490.00
25 November 2025	Review discovery dispute re: Jupiter (0.3); monitor meet and confer call between Latham & Watkins and W&C teams re: Committee member depositions and final exhibits (0.6).	S Greissman	0.90	2,250.00
25 November 2025	Review Rowe deposition and appearance to object (1.4); prepare for meet and confer and review evidence and witness list issues (2.8).	E Smith	4.20	6,846.00
25 November 2025	Attend meet and confer with Debtors (0.3); call with J. Yoo re: same (0.2).	A Chase	0.50	790.00
25 November 2025	Review parties' submissions re: Silvers report discovery dispute (0.5); status conference before Judge Perez re: Silvers investigative report (0.5).	A Hong	1.00	1,370.00
25 November 2025	Attend meet and confer with Debtors re: confirmation hearing.	J Yoo	0.50	685.00
25 November 2025	Review Quinn brief re: Silvers' report disclosure (0.7); email with A. Chase and C. West re: same (0.3); attend meet and confer with Latham re: exhibits and discovery (0.3).	L Miranda	1.30	1,586.00
25 November 2025	Attend deposition of D. Rowe (0.5); share notes with W&C team after (0.3); review and distinguish cases cited in Silvers brief and emails re: same with L.	C Chitwan	2.30	2,553.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Miranda, B. Kakani, A. Venes and K. Wick (1.5).			
25 November 2025	Prepare exhibits for confirmation objection (1.1); prepare exhibits, deposition designations, and witness list for confirmation hearing (3.3).	B Kakani	4.40	3,828.00
25 November 2025	Pull and send copies of authorities cited in Silvers discovery dispute brief per C. Chitwan.	A Venes	0.70	343.00
26 November 2025	Monitor Mounts-Gonzalez deposition (3.1); follow up correspondence with C. Shore re: same (0.2); follow up conference call with W. Smith re: same (0.4).	S Greissman	3.70	9,250.00
26 November 2025	Defend deposition of David Mounts Gonzalez and prepare for deposition (3.0); review documents relevant to deposition (0.8); calls and correspondence re: discovery dispute (0.6).	E Smith	4.40	7,172.00
26 November 2025	Attend portion of Mounts Gonzales deposition.	A Chase	0.60	948.00
26 November 2025	Attend portion of deposition of David Mounts Gonzales (1.4); email with J. Bourgault re: same (0.1).	L Miranda	1.50	1,830.00
26 November 2025	Prepare for D. Gonzales deposition (0.5); Second-chair D. Gonzales deposition (2.4); Meet with J. Yoo & E. Smith to discuss exhibits following deposition (0.1).	J Bourgault	3.00	2,610.00
26 November 2025	Prepare exhibits and deposition designations for confirmation hearing.	B Kakani	3.10	2,697.00
29 November 2025	Review and discuss Quinn report with C. West (1.0); review and discuss documents subject to discovery dispute (1.9).	E Smith	2.90	4,727.00
30 November 2025	Calls and correspondence with C. West and C. Shore re: open discovery issues.	E Smith	1.50	2,445.00
30 November 2025	Review Shepard deposition transcript.	A Chase	3.40	5,372.00
SUBTOTAL: Discovery			**1,647.20**	**2,179,725.00**

Exclusivity, Plan & Disclosure Statement

2 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
3 November 2025	Review valuation report drafts (3.3); calls re: business plan (0.5).	J Shore	3.80	9,500.00
4 November 2025	Calls with Alix and W&C teams re: reopening Plan issues.	J Shore	0.50	1,250.00
5 November 2025	Reviewing motion to pay exit financing fees (0.7); call with Alix re: expert report (0.7).	A Zatz	1.40	2,940.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
5 November 2025	Telephone conference with A. Zatz re: exit financing motion, confirmation objection, and real estate retention applications.	B Lingle	1.00	1,370.00
5 November 2025	Analyze motion for entry of order for authorization to enter fee and reimbursement letters (0.4); analyze order re: same (0.2); analyze sealing motion re: same (0.1); draft email summary to D. Litz re: same (0.3); revise same (0.2).	D Mago	1.20	1,188.00
6 November 2025	Emails internal and Alix re: valuation.	C Koster	0.40	760.00
7 November 2025	Review exit financing filing/motion.	S Greissman	1.10	2,750.00
7 November 2025	Call with Alix and W&C teams re: Plan objection issues.	J Shore	0.50	1,250.00
7 November 2025	Review and respond to emails with A. Chase and A. Aquije re: upcoming filing of preliminary witness list (0.1); finalize and file same (0.1); review and respond to emails with A. Chase and A. Aquije re: amended preliminary witness list (0.1); finalize and file same (0.1); electronically serve same (0.2).	D Hirshorn	0.60	294.00
10 November 2025	Correspond with W&C team re: discovery issues.	G Pesce	0.80	1,680.00
11 November 2025	Correspond with W&C team re: discovery.	G Pesce	0.80	1,680.00
12 November 2025	Correspond with W&C team re: Plan confirmation.	G Pesce	0.80	1,680.00
13 November 2025	Correspond with W&C team re: Plan confirmation.	G Pesce	0.80	1,680.00
14 November 2025	Correspond with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
15 November 2025	Correspond with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
16 November 2025	Correspond with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
16 November 2025	Review exit financing motion and correspond with Alix team re: same (0.4); draft confirmation objection outline (1.6).	B Lingle	2.00	2,740.00
16 November 2025	Attend meeting with W&C team re: next steps discovery and confirmation.	D Mago	0.90	891.00
17 November 2025	Attention to Plan supplement.	S Greissman	0.80	2,000.00
17 November 2025	Correspond with W&C team re: Plan confirmation.	G Pesce	0.80	1,680.00
17 November 2025	Reviewing Plan Supplement.	A Zatz	0.50	1,050.00
17 November 2025	Draft confirmation objection outline (1.7); review and	B Lingle	3.00	4,110.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	analyze Plan supplement (1.3).			
17 November 2025	Analyze B. Lingle outline re: Confirmation Objection (0.4); research additional arguments and angles re: same (1.6).	R Beil	2.00	2,560.00
18 November 2025	Emails with W&C and Alix teams re: pre-trial conference (0.3); review Plan supplement (1.0); emails re: same (0.2).	J Shore	1.50	3,750.00
18 November 2025	Correspond with W&C team re: Plan confirmation objection.	G Pesce	0.80	1,680.00
18 November 2025	Call with B. Lingle re: confirmation objection (0.2); call with C. Shore re: confirmation objection (0.1); call with F. Lupinacci re: Plan supplement review for confirmation objection (0.2); meeting with S. Greissman re: confirmation objection (0.2); reviewing Plan for confirmation objection (2.2); and preparing confirmation objection outline (1.0).	A Zatz	3.90	8,190.00
18 November 2025	Review confirmation objection.	C Koster	0.50	950.00
18 November 2025	Review transaction documents.	F Lupinacci	3.40	6,460.00
18 November 2025	Call among W&C and Alix re: confirmation preparation.	A Chase	0.50	790.00
18 November 2025	Draft confirmation objection.	B Lingle	3.10	4,247.00
18 November 2025	Analyze Plan release and exculpation language re: confirmation objection (1.3); research release standards re: same (2.5); research classification issues re: same (1.5).	R Beil	5.30	6,784.00
19 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
19 November 2025	Call with B. Lingle re: confirmation objection (0.3); drafting confirmation objection preliminary statement (1.8); and revising confirmation objection (0.4).	A Zatz	2.50	5,250.00
19 November 2025	Review confirmation objection.	C Koster	0.30	570.00
19 November 2025	Review of transaction documents.	F Lupinacci	3.30	6,270.00
19 November 2025	Review, analyze and comment on Plan objection (0.3) and correspond with A. Zatz, B. Lingle, and R. Beil re: same (0.2).	V Sachdev	0.50	710.00
19 November 2025	Telephone conference with A. Zatz re: confirmation objection (0.4); telephone conference with R. Beil and correspond with W&C team re: confirmation research (0.7); draft confirmation objection (0.4).	B Lingle	1.50	2,055.00
19 November 2025	Plan supplement review and confer with Alix team re: contracts.	D Litz	0.80	1,096.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 November 2025	Attend W&C team call re: litigation workstreams ahead of hearing (0.5); confer with W&C team re: deposition designations (0.3); confer with W&C team re: exhibit and witness lists (0.2).	J Yoo	1.00	1,370.00
19 November 2025	Calls with B. Lingle re: confirmation objection (0.3); analyze Plan and Disclosure Statement re: same (0.8); research discrimination issues re: same (2.5); Analyze case re: debtor release standards (1.2).	R Beil	4.80	6,144.00
19 November 2025	Commence work re: preparation of exhibits list (1.4); collation of documents for confirmation trial (1.2); emails re: same with J. Yoo, C. Issac and A. Quintana (0.2).	C Chitwan	2.80	3,108.00
19 November 2025	Correspondence with R. Beil re: confirmation objection (0.2); legal research re: confirmation requirements (4.7); draft case explanations and analyses re: same (1.2).	D Mago	6.10	6,039.00
19 November 2025	Review of LLCA and warrant agreement (4.0); discussed internally (1.0); drafted client facing issues list (0.7); incorporated all feedback received from experts (1.3).	S Abouhashish	7.00	6,090.00
19 November 2025	Conduct legal research for confirmation objection (2.4); draft deposition designation for H. Sampson (4.1).	J Walz	6.50	5,655.00
20 November 2025	Office conference with A. Zatz re: confirmation objection (0.5); review and revise confirmation objection preliminary statement (0.9).	S Greissman	1.40	3,500.00
20 November 2025	Calls with W&C and Alix teams re: pretrial conference (0.3); calls with W&C and Alix teams re: correspondence and next steps (0.2).	J Shore	0.50	1,250.00
20 November 2025	Review select provisions of LLC agreement in Plan supplement.	A Ericksen	0.50	1,100.00
20 November 2025	Correspond with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
20 November 2025	Revising confirmation objection (3.4); and internal call re: confirmation objection (0.1); call with L&W re: witness list (0.1).	A Zatz	3.60	7,560.00
20 November 2025	Review of LLCA, Warrant Agreement and equity rights procedures (2.3); review Plan document generally (2.3).	F Lupinacci	4.60	8,740.00
20 November 2025	Call with C. West and A. Zatz re: Plan objection.	A Chase	0.50	790.00
20 November 2025	Call with J. Amico and C. Hood (Alix) re: analysis for Plan objection (0.4); review analysis received from Alix re: same (0.3); call with A. Zatz and R. Komendowski (Alix) re: Plan objection arguments re: scope of 1L lien (0.8).	V Sachdev	1.50	2,130.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 November 2025	Draft confirmation objection (3.9); revise same (2.3).	B Lingle	6.20	8,494.00
20 November 2025	Draft rider for confirmation objection.	D Litz	0.70	959.00
20 November 2025	Review deposition designations (2.8); confer with W&C team re: deposition designations (0.3).	J Yoo	3.10	4,247.00
20 November 2025	Research requisite consideration for releases re: confirmation objection release argument (1.2); analyze Silver investigation issues re: same (1.0); draft and revise argument re: same (2.2); research best interest of creditors test law re: confirmation objection argument (1.5); draft and revise argument re: same (1.8).	R Beil	7.70	9,856.00
20 November 2025	Updated issues list (0.5); reviewed warrant agreement against precedent (2.1); discuss issues with W&C team (0.5).	S Abouhashish	3.10	2,697.00
20 November 2025	Research issues for confirmation objection (5.6); Prepare C. Shandler deposition summary (2.0); Conduct targeted discovery searches for projection materials (0.7); Research motion in limine (0.3); Research issues for Alix Partners (0.8); Provide high-level deposition update for A. Zatz (0.9).	J Bourgault	10.30	8,961.00
20 November 2025	Finalize research summary for confirmation objection (1.1); revise deposition designation for H. Sampson (0.3).	J Walz	1.40	1,218.00
20 November 2025	Locate and email precedent objection to Plan to B. Lingle.	D Hirshorn	0.20	98.00
20 November 2025	Confer with C. Chitwan re: exhibits list.	K Wick	0.10	49.00
21 November 2025	Monitor pre-trial conference (0.4); review issues relating to confirmation objection (2.4); conference call with C. Shore re: pre-trial conference preparation (0.3); conference call with C. Shore re: pre-trial conference follow up and confirmation objection (0.5).	S Greissman	3.60	9,000.00
21 November 2025	Preparation for pretrial conference (0.4); conference call with W&C and Alix teams re: Plan objection (0.8); trial preparation (3.6).	J Shore	4.80	12,000.00
21 November 2025	Call with A. Zatz and F. Lupinacci re: rights offering documents (0.5); review rights offering documents (0.6).	A Ericksen	1.10	2,420.00
21 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
21 November 2025	Internal call re: Plan supplement (0.5); attending pre-trial conference (0.3); revising confirmation objection (4.9); and reviewing pre-trial summary (0.1).	A Zatz	5.80	12,180.00
21 November 2025	Review confirmation objection.	C Koster	0.40	760.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
21 November 2025	Review transaction documentation (2.8); discussion with internal W&C team re: same (0.5).	F Lupinacci	3.30	6,270.00
21 November 2025	Call with B. Lingle re: Plan objection (0.1); review release provisions in Plan (0.4); review, comment on, and revise draft objection to same (0.7); research re: same (1.1); review Silvers declaration for same (0.8); review Silvers deposition transcript for same (3.2).	V Sachdev	6.30	8,946.00
21 November 2025	Review notes from L. Miranda re: pre-trial conference (0.3); deposition designations for S. Kern (2.5).	A Hong	2.80	3,836.00
21 November 2025	Draft confirmation objection (3.9); revise same (3.8); correspond with R. Beil, V. Sachdev re: Plan releases and investigation (0.3).	B Lingle	8.00	10,960.00
21 November 2025	Revise rider for confirmation objection brief.	D Litz	1.40	1,918.00
21 November 2025	Attend W&C team meeting re: litigation workstreams for hearing (0.5); confer with W&C team re: litigation workstreams (0.2); confer with E. Smith re: exhibit list (0.1); review deposition designations (0.7).	J Yoo	1.50	2,055.00
21 November 2025	Research re: confirmation objection (1.2); draft and revise release argument re: same (2.6).	R Beil	3.80	4,864.00
21 November 2025	Emails with K. Wick re: preparation of exhibits list (0.4); discussions with same re: same (0.4).	C Chitwan	0.80	888.00
21 November 2025	Internal meeting with W&C team to discuss documents (0.5); review of term sheet and warrant agreement (1.2); email with W&C team re: issues (0.1); further discussion internally with W&C team (0.2).	S Abouhashish	2.00	1,740.00
21 November 2025	Coordinate with court clerk for trial (0.2); Attend litigation team strategy meeting (0.3); Prepare L. Norwalk deposition designations (0.8).	J Bourgault	1.30	1,131.00
21 November 2025	Finalize D. Silvers deposition designations.	J Walz	0.30	261.00
22 November 2025	Correspond with A. Zatz and R. Komendowski re: equity rights offering analysis.	A Ericksen	0.50	1,100.00
22 November 2025	Team call re: trial preparation (1.0); prepare for Magrisi deposition (1.3).	J Zakia	2.30	5,060.00
22 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
22 November 2025	Revising confirmation objection.	A Zatz	5.40	11,340.00
22 November 2025	Confirmation hearing preparation.	C Koster	0.50	950.00
22 November 2025	Calls and correspondence re: preparation for confirmation hearing workstreams with litigation team.	E Smith	1.50	2,445.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 November 2025	Review independent director deposition transcript in support of Plan objection (2.1); draft Plan objection section on releases (2.3); correspond with R. Beil and B. Lingle re: same (0.1); call with R. Beil re: same (0.1); review and comment on revised draft objection to releases (0.8); correspond with A. Zatz, R. Beil and B. Lingle re: same (0.2).	V Sachdev	5.60	7,952.00
22 November 2025	Emails with A. Chase and litigation team re: Plan objection (0.3); review draft confirmation objection brief (0.8); review Z. Jamal deposition transcript for testimony re: confirmation objection issues (1.9); deposition designations for S. Kern (2.9); emails with A. Chase, J. Yoo, and J. Bourgault re: deposition designations (0.4).	A Hong	6.30	8,631.00
22 November 2025	Revise confirmation objection.	B Lingle	1.00	1,370.00
22 November 2025	Review deposition designations (0.1); confer with W&C team re: same (0.2); confer with W&C team re: exhibit list (0.2).	J Yoo	0.50	685.00
22 November 2025	Draft and revise release argument re: confirmation objection (1.2); analyze Silvers Deposition re: same (1.0); research valid forms of consideration re: same (1.1).	R Beil	3.30	4,224.00
22 November 2025	Attend W&C strategy call re: trial preparation and confirmation.	L Miranda	1.00	1,220.00
22 November 2025	Correspondence with C. Chitwan re: exhibit list (0.2); prepare exhibit list (0.7).	K Wick	0.90	441.00
23 November 2025	Review confirmation objection.	S Greissman	1.50	3,750.00
23 November 2025	Calls with W&C and Alix teams re: trial preparation and objection (0.9); emails with W&C and Alix teams re: same (2.4).	J Shore	3.30	8,250.00
23 November 2025	Conferences with W&C team re: Plan confirmation.	G Pesce	0.80	1,680.00
23 November 2025	Internal call re: confirmation objection (0.4); and revising confirmation objection (5.2).	A Zatz	5.60	11,760.00
23 November 2025	Confirmation hearing preparation.	C Koster	0.50	950.00
23 November 2025	Review and revise draft Plan objection (3.6); email among W&C re: same (0.3); email with J. Yoo and A. Hong re: deposition designations (0.3).	A Chase	4.20	6,636.00
23 November 2025	Review and comment on Plan objection (0.8); call with C. Shore, A. Zatz, B. Lingle and Alix team re: Plan objection analysis (0.9); call with A. Zatz and B. Lingle re: Plan objection (0.9); correspond with Alix re: follow-up questions (0.3); call with B. Lingle re: outstanding items (0.1); review Magrisi declaration in support of Plan objection (0.3); correspond with A. Zatz and B.	V Sachdev	3.50	4,970.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Lingle re: same (0.2).			
23 November 2025	Emails with A. Chase, B. Lingle, L. Miranda, J. Bourgault, J. Walz, and litigation team re: deposition testimony for confirmation objection (0.5); review Z. Jamal deposition transcript for relevant testimony for confirmation objection (1.9); review deposition testimony flagged by L. Miranda, J. Walz, and J. Bourgault for confirmation objection (1.8); revise draft confirmation objection brief to incorporate deposition testimony (1.7); emails with A. Chase and J. Yoo re: deposition designations (0.4); revise deposition designations for S. Kern (0.6).	A Hong	6.90	9,453.00
23 November 2025	Telephone conference with A. Zatz, C. Shore and Alix team re: confirmation objection (0.8); telephone conference with A. Zatz and V. Sachdev re: same (0.1); draft same (3.9); revise same (2.3).	B Lingle	7.10	9,727.00
23 November 2025	Legal research for confirmation objection brief.	D Litz	1.70	2,329.00
23 November 2025	Confer with W&C team re: deposition designations (0.2); review deposition designations (0.8).	J Yoo	1.00	1,370.00
23 November 2025	Revise confirmation objection with testimony from depositions (1.4); review C. Shandler deposition transcript re: same (0.9).	L Miranda	2.30	2,806.00
23 November 2025	Research re: waiver of privilege re: reports underlying special Committee investigations and emails with L. Miranda re: same (5.0); emails and calls with K. Wick re: preparation of exhibits list (0.6); emails with B. Kakani re: exhibits list (0.2); research re: exclusion of non-final conclusions of investigative reports and emails re: same with L. Miranda and B. Kakani (1.5); emails with Veritext team (0.1).	C Chitwan	7.40	8,214.00
23 November 2025	Analyze email from B. Lingle re: legal research for confirmation objection (0.1); Legal research re: confirmation issues (2.9); draft email to B. Lingle re: same (0.3).	D Mago	3.30	3,267.00
23 November 2025	Research issues for Plan objection.	J Bourgault	3.10	2,697.00
23 November 2025	Revise confirmation objection with deposition excerpts (1.7); draft deposition designation summary (0.6).	J Walz	2.30	2,001.00
23 November 2025	Prepare exhibit list.	K Wick	9.50	4,655.00
24 November 2025	Review and comment on Plan objection (5.4); confer with W&C and Alix teams re: trial preparation (0.7); emails with W&C and Alix teams re: deposition of Committee members (0.3); settlement emails with W&C team (0.6); edits to Silvers letter (0.5); revisions to potential litigation supplement (1.5); follow up with W&C team on Magrisi deposition (0.5).	J Shore	9.50	23,750.00
24 November 2025	Conferences with W&C team re: Plan confirmation	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	discovery and objection strategic issues.			
24 November 2025	Calls with S. Greissman re: confirmation objection (0.2); meetings with S. Greissman re: confirmation objection (0.5); reviewing supplemental Silvers declaration (0.2); reviewing amended schedule of retained causes of action (0.1); and revising confirmation objection (9.8).	A Zatz	10.80	22,680.00
24 November 2025	Review supplemental brief (0.4); review and edit confirmation objection (0.5).	C Koster	0.90	1,710.00
24 November 2025	Review confirmation objection and revise to include deposition testimony.	E Smith	3.00	4,890.00
24 November 2025	Review and revise work plan for trial preparation from L. Miranda (0.5); revise draft witness list (0.2).	A Chase	0.70	1,106.00
24 November 2025	Review revised Plan objection (0.3); correspond with A. Zatz and B. Lingle re: same (0.2); review comments from G. Pesce re: same (0.1); correspond with Alix and B. Lingle re: outstanding points (0.2); correspond with B. Lingle re: revisions (0.2) and research re: same (0.2); call with S. Greissman, A. Zatz, B. Lingle, and Alix re: calculations for Plan objection (0.4); correspond with Alix re: Plan treatment calculation (0.1); correspond with B. Lingle re: outstanding comments to Plan objection (0.1); call with A. Zatz, B. Lingle, R. Beil, J. Walz, D. Mago, D. Litz, and J. Bourgault re: objection (0.4); review and comment on most recent draft objection, including addressing comments from A. Zatz re: potential litigation (3.2); correspond with J. Walz re: same (0.4); correspond with J. Amico (Alix) re: same (0.1).	V Sachdev	5.90	8,378.00
24 November 2025	Review draft confirmation objection brief (0.5); emails with B. Lingle re: confirmation objection (0.2); pull Z. Jamal deposition testimony re: Moelis issues for confirmation objection brief (1.0); emails with S. Greissman, B. Lingle, and J. Bourgault re: deposition testimony for confirmation objection (0.3); call with S. Greissman re: confirmation objection (0.1); emails with B. Lingle and J. Bourgault re: confirmation objection (0.3); revise confirmation objection (0.7); review proposed deposition designations for B. Gutierrez (0.5); review revised Plan supplement (0.3).	A Hong	3.90	5,343.00
24 November 2025	Telephone conference with A. Zatz, V. Sachdev re: claims analysis (0.2); telephone conference with W&C team re: confirmation objection (0.3); draft confirmation objection (3.9); revise same (3.9).	B Lingle	8.30	11,371.00
24 November 2025	Legal research re: remedy for potential litigation tactic (4.4); confer with A. Zatz and S. Greissman re: same (0.4); answer follow up questions re: same (0.1).	D Litz	4.90	6,713.00
24 November 2025	Confer with W&C team re: witness list (0.3); correspond with Debtors' counsel re: hearing exhibits (0.2); confer with W&C team re: hearing exhibits (0.4);	J Yoo	4.60	6,302.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	confer with W&C team re: deposition designations (0.2); review deposition designations (3.5).			
24 November 2025	Analyze objection and fill in outstanding citation holes re: confirmation objection.	R Beil	2.30	2,944.00
24 November 2025	Emails with Alix re: exhibits for confirmation objection (0.2); emails with E. Smith re: same (0.1); review confirmation objection (0.9); revise confirmation objection (1.1); call with Alix and C. Shore re: confirmation objection exhibits (0.2); email with C. Shore re: same (0.1); call with Alix re: confirmation objection exhibits (0.5); draft declaration for confirmation objection (0.3); review exhibits for confirmation hearing (0.4); email with W&C re: trial preparation for confirmation hearing (0.6).	L Miranda	4.40	5,368.00
24 November 2025	Revision of witness list and emails re: same with B. Kakani and J. Yoo (0.3); revision of exhibits list and emails re: same with J. Yoo, L. Miranda, B. Kakani and K. Wick (2.7).	C Chitwan	3.00	3,330.00
24 November 2025	Meeting with A. Zatz. V. Sachdev and W&C team re: confirmation objection outstanding items (0.4); correspondence with B. Lingle re: confirmation objection outstanding research (0.1); conduct legal research re: consideration in return for release of estate claims (4.7).	D Mago	5.20	5,148.00
24 November 2025	Research issues for Plan objection (6.8); Pull deposition testimony for confirmation objection (2.9); Draft & revise sections of confirmation objection brief (1.1); Research evidentiary issues (2.1).	J Bourgault	12.90	11,223.00
24 November 2025	Call with confirmation objection team (0.3); revise confirmation objection (4.4); review correspondence re: same (0.1); revise cover letter for H. Sampson deposition designation (1.9).	J Walz	6.70	5,829.00
24 November 2025	Prepare exhibit list.	K Wick	10.90	5,341.00
25 November 2025	Review exit financing related correspondence (0.1); office conference with A. Zatz re: same (0.2); conference call with W&C team and Alix Partners re: confirmation objection (0.1); internal office conference re: finalizing confirmation objection (0.5); review and comment/revise confirmation objection (3.5).	S Greissman	4.40	11,000.00
25 November 2025	Final edits to Plan objection (2.5); attend team calls re: same (0.3); Conferences re: discovery disputes (0.7); witness list emails (0.4); call with W&C team re: exhibits (0.6); review exit financing materials (1.2).	J Shore	5.70	14,250.00
25 November 2025	Review and revise Plan objection.	J Zakia	3.10	6,820.00
25 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 November 2025	Revising confirmation objection (6.9); call with Alix re: confirmation objection (0.3); and call with S. Greissman re: confirmation objection (0.2).	A Zatz	7.40	15,540.00
25 November 2025	Review confirmation objection, deposition transcript excerpts and declaration exhibits and draft rider.	E Smith	2.50	4,075.00
25 November 2025	Review draft confirmation objection (0.9); revise redactions to confirmation objection (0.4); revise deposition designations for K. Glodowski (0.5).	A Chase	1.80	2,844.00
25 November 2025	Review and revise Plan objection through multiple iterations (7.6); correspond with R. Beil and B. Lingle re: same (0.1); confer with B. Lingle re: same and Plan for filing (0.3); correspond with B. Lingle re: additions to Plan objection (0.2); correspond with R. Beil re: outreach to Alix (0.1); correspond with Alix re: same (0.2); correspond with A. Zatz, B. Lingle, and S. Greissman re: comments to objection (0.2); call with A. Zatz, B. Lingle, S. Greissman, Alix and others re: Plan objection (0.5); call with A. Zatz, B. Lingle, R. Beil, and S. Greissman re: same in advance of filing(0.4); confer with A. Hong re: deposition cites for objection (0.1); correspondence with B. Lingle and K. Wick re: filing (0.1); confer with B. Lingle re: redacted objection (0.1).	V Sachdev	9.90	14,058.00
25 November 2025	Revise brief re: confirmation objection to incorporate deposition testimony (0.6); emails with B. Lingle and J. Bourgault re: same (0.4); review confirmation objection brief (0.8); propose redactions to confirmation objection for public filing (1.9); emails with A. Chase, B. Lingle, L. Miranda, and A. Venes re: filing redacted public version of confirmation objection (0.6).	A Hong	4.30	5,891.00
25 November 2025	Draft confirmation objection (5.5); revise same (3.9); revise exit financing order (0.3); correspond with A. Zatz, S. Greissman, C. Shore re: exit financing (0.5).	B Lingle	10.20	13,974.00
25 November 2025	Review and summarize confirmation objections (0.8); prepare rider for confirmation objection as to standing motion / complaint (1.7); confer with V. Sachdev re: same (0.4).	D Litz	2.90	3,973.00
25 November 2025	Assist with preparing exhibit list (2.8); confer with W&C team re: exhibit list (0.6); assist with preparing deposition designations (2.7); confer with W&C team re: deposition designations (0.4).	J Yoo	6.50	8,905.00
25 November 2025	Research nature of estate claims re: confirmation objection (1.3); research confirmation waiver objection standards and draft rider re: same (1.5); research release consideration standards re: same (0.7); analyze Excluded Assets under Prepetition Documents and DIP Financing Documents re: same (0.5); review draft and revise portions of objection re: same (1.2).	R Beil	5.20	6,656.00
25 November 2025	Call with E. Smith and J. Yoo re: Plan confirmation objection (0.2); revise E. Smith declaration for Plan objection (various iterations) (0.9); emails with E.	L Miranda	8.70	10,614.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Smith re: same (0.2); review exhibits for E. Smith declaration (1.2); email with W&C re: same (0.2); review C. Shandler deposition transcript for exhibits (0.4); revise objection to Plan confirmation (0.3); review redactions on Plan confirmation objection (0.2); emails with W&C re: same (0.1); review exhibits for Plan confirmation hearing (0.7); email with C. Chitwan and A. Chase re: same (0.1); review caselaw from Quinn brief re: hearing preparation and summaries from C. Chitwan and B. Kakani (1.9); conduct legal research re: same (0.2); draft email to C. West re: same (0.9); call with C. West and A. Chase re: hearing on Silvers' report (0.4); confer with A. Chase and C. West re: hearing preparation for Silvers' Report (0.3); email to Committee re: Silvers Report filings (0.3); email with A. Chase re: case law on report disclosures (0.2).			
25 November 2025	Finalize deposition transcript exhibits for confirmation objection.	A Aquije	0.80	888.00
25 November 2025	Revise witness list and emails re: same with J. Yoo (0.8); finalize exhibits and emails re: same with J. Yoo, B. Kakani, K. Wick and L. Miranda (4.3); revise and share witness list with W&C team for comments (0.2).	C Chitwan	5.30	5,883.00
25 November 2025	Conduct substantive cite check of confirmation objection.	D Mago	4.60	4,554.00
25 November 2025	Meet with Alix team to discuss Plan confirmation objection (0.8); Research Plan objection issues & revise Plan objection accordingly (3.0); Research evidentiary issues (1.7); Prepare Plan confirmation exhibits (1.2).	J Bourgault	6.70	5,829.00
25 November 2025	Revise confirmation objection (6.5); revise deposition designations (0.3).	J Walz	6.80	5,916.00
25 November 2025	Assist team with finalizing exhibits to Declaration in support of Confirmation Objection to be filed (0.3); assist with generating TOA to redacted version of objection to confirmation (0.8); correspond with W&C team re: same (0.1); prepare for, and assist team with submission of redacted version of confirmation objection (0.6); serve copy of filing on MSL notice parties (0.1); update pleadings file (0.1).	A Venes	2.00	980.00
25 November 2025	Add TOC and TOA in confirmation objection (1.1); coordinate filing (0.3).	K Wick	1.40	686.00
26 November 2025	Review deposition designations (1.6); follow up on depositions and disputes re: same (0.9).	J Shore	2.50	6,250.00
26 November 2025	Review deposition designations.	J Zakia	2.60	5,720.00
26 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 November 2025	Review deposition designations (2.0); review witness and exhibit list (1.0).	E Smith	3.00	4,890.00
26 November 2025	Review witness and exhibit list.	A Chase	1.20	1,896.00
26 November 2025	Review and summarize Plan objections and confer with A. Zatz re: same.	D Litz	2.20	3,014.00
26 November 2025	Assist with preparing exhibit list (2.1); correspond with Debtors' counsel re: exhibit list (0.1); assist with preparing deposition designations (2.9); correspond with Debtors' counsel re: deposition designations (0.1); confer with W&C team re: exhibit list (0.4); assist with preparing witness list (0.3); confer with W&C team re: witness list (0.2).	J Yoo	6.10	8,357.00
26 November 2025	Revise deposition designation chart (0.8); email with J. Yoo and B. Kakani re: same (0.1); confer with J. Yoo re: exhibit list (0.2); review witness list (0.1); email with Veritext re: video of depositions (0.1); review C. Shandler deposition transcript for cross outline for confirmation hearing (0.7); draft cross outline for C. Shandler re: same (1.2); email with J, Bourgault re: cross outlines for confirmation hearing (0.2).	L Miranda	3.40	4,148.00
26 November 2025	Finalize and file witness list and emails re: same with A. Venes and J. Yoo (0.8); finalize exhibits list with J. Yoo, B. Kakani and K. Wick and emails re: same with R. Beil and L. Miranda, (5.9); review witness list filed by first lien agent, consenting creditors and DIP Financing lenders (0.1).	C Chitwan	6.80	7,548.00
26 November 2025	Draft deposition designations.	C Isaac	1.80	1,566.00
26 November 2025	Coordinate with J. Yoo re: deposition designations.	J Walz	0.20	174.00
27 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues.	G Pesce	0.80	1,680.00
27 November 2025	Analyze confirmation objections.	D Mago	0.70	693.00
28 November 2025	Internal conference call re: confirmation objection, potential responses and arguments.	S Greissman	0.90	2,250.00
28 November 2025	Review exit financing materials (0.8); emails with W&C team re: settlement (0.3); review Silvers materials (0.3).	J Shore	1.40	3,500.00
28 November 2025	Conferences with W&C team re: Plan confirmation discovery and objection strategic issues (0.8); prepare for confirmation (1.8).	G Pesce	2.60	5,460.00
28 November 2025	Email E. Smith re: Debtors' proposed exhibits.	J Yoo	0.10	137.00
29 November 2025	Conferences re: confirmation.	G Pesce	1.80	3,780.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 November 2025	Draft cross-outline for C. Shandler (3.8); review C. Shandler deposition transcript and exhibits re: same (1.8); continue to draft C. Shandler cross outline (3.3).	L Miranda	8.90	10,858.00
30 November 2025	Prepare L. Norwalk cross-outline.	J Bourgault	3.60	3,132.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement			**522.70**	**759,367.00**

Executory Contracts & Unexpired Leases

18 November 2025	Analyze objections to Debtors' notice of assumption of executory contracts (1.2); draft summary chart re: same (0.1); email A. Zatz re: same (0.1).	D Mago	1.40	1,386.00
SUBTOTAL: Executory Contracts & Unexpired Leases			**1.40**	**1,386.00**

Hearings & Court Matters

6 November 2025	Draft witness list for upcoming hearing (0.3); correspondence re: same (0.2).	A Aquije	0.50	555.00
7 November 2025	Prepare amended witness list.	A Chase	0.50	790.00
20 November 2025	Conference with C. Shore and J. Zakia re: pre-trial conference.	S Greissman	0.50	1,250.00
21 November 2025	Attend pre-trial conference.	C Koster	0.50	950.00
21 November 2025	Call with C. Shore to discuss pre-trial conference and attend conference.	E Smith	1.00	1,630.00
21 November 2025	Attend pretrial conference.	A Chase	0.40	632.00
21 November 2025	Attend pre-trial conference.	V Sachdev	0.40	568.00
21 November 2025	Emails with W&C re: pre trial conference (0.1); draft notes on pre trial conference re: same (0.4).	L Miranda	0.50	610.00
21 November 2025	Attend Pretrial Conference.	D Mago	0.20	198.00
21 November 2025	Register C. Shore for hearing (0.1); correspondence with C. Chitwan and J. Yoo re: exhibit list (0.2); review precedents and create template (0.6).	K Wick	0.90	441.00
25 November 2025	Monitor court hearing re: Silvers report and related (0.8); conference call with C. Shore re: court hearing, meet and confer and related (0.3).	S Greissman	1.10	2,750.00
25 November 2025	Preparation for court hearing.	E Smith	0.30	489.00
25 November 2025	Assist C. West with preparation for hearing (1.7); attend hearing (0.5).	A Chase	2.20	3,476.00
25 November 2025	Attend hearing on admission of Quinn report.	V Sachdev	0.50	710.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
25 November 2025	Attend status conference re: discovery dispute.	D Litz	0.50	685.00
25 November 2025	Attend and take notes on hearing on Silvers' Report (0.5); Post-hearing debrief with C. West and A. Chase (0.1).	L Miranda	0.60	732.00
25 November 2025	Attend hearing on 11/25 re: Silvers Report.	D Mago	0.60	594.00
25 November 2025	Correspondence with Veritext re: deposition exhibits (0.1); confer with C. Chitwan; J. Yoo and B. Kakani re: exhibit list (0.4); review and edit exhibit list (0.6).	K Wick	1.10	539.00
26 November 2025	Prepare for filing of Final Exhibit List for confirmation hearing on 12/08 per J. Yoo and C. Chitwan (0.2); e-file witness list (0.1); serve on MSL notice parties and courtesy copy to Chambers (0.2); update pleadings file (0.1).	A Venes	0.60	294.00
26 November 2025	Review and edit exhibit list.	K Wick	3.20	1,568.00
SUBTOTAL: Hearings & Court Matters			**16.10**	**19,461.00**

Investigation of Causes of Action

1 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00
1 November 2025	Review and analyze updated research from G. Zahiremami and D. Mago (0.8); correspond with G. Zahiremami re: same (0.2).	V Sachdev	1.00	1,420.00
1 November 2025	Emails with A. Chase, L. Miranda re: analysis of prior transaction (0.5); factual research re: prior transaction (1.9); emails with G. Silnicki and P. Rai re: prior transaction issues (0.2); review transaction documents re: prior transaction (1.6); revise chart re: analysis of prior transaction (0.5).	A Hong	4.70	6,439.00
1 November 2025	Draft chart re: prepetition transactions for C. Shore (2.2); review diligence re: same (1.3); email with A. Chase re: same (0.2).	L Miranda	3.70	4,514.00
1 November 2025	Conduct research re: unencumbered asset analysis (2.3); revise chart re: potential litigation issue (0.8); emails with V. Sachdev re: same (0.1).	G Zahiremami	3.20	3,168.00
2 November 2025	Review investigation analysis.	S Greissman	1.10	2,750.00
2 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00
2 November 2025	Review/edit complaint (1.9); research re: same (1.1).	C West	3.00	5,370.00
2 November 2025	Review and revise updated draft standing motion (3.3); research caselaw in support of same (0.4); correspond with R. Beil, G. Zahiremami and D. Mago re: same (0.2).	V Sachdev	3.90	5,538.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 November 2025	Analyze V. Sachdev edits to standing motion (0.5), draft and revise standing motion re: same (1.5), research potential litigation issue burden of proof re: same (0.8).	R Beil	2.80	3,584.00
2 November 2025	Draft deposition outline for B. Gutierrez (3.2); review diligence re: same (1.6); emails with A. Chase and J. Yoo re: same (0.3).	L Miranda	5.10	6,222.00
3 November 2025	Review investigation analysis.	S Greissman	1.50	3,750.00
3 November 2025	Conferences re: investigation.	G Pesce	0.80	1,680.00
3 November 2025	Review/edit draft complaint (2.2); fact and legal research re: same (1.4).	C West	3.60	6,444.00
3 November 2025	Call among W&C and Alix re: investigation (0.4); call with C. West and L. Miranda re: same (0.2).	A Chase	0.60	948.00
3 November 2025	Draft, review and revise standing motion (3.3); correspond with R. Beil, G. Zahiremami and D. Mago re: same (0.6); review and revise further turns of same (2.4); confer with A. Zatz re: same (0.1).	V Sachdev	6.40	9,088.00
3 November 2025	Revise complaint sections re: potential claims against directors and officers (1.8); emails with A. Chase, L. Miranda, P. Rai, and G. Silnicki re: investigation analysis (0.5).	A Hong	2.30	3,151.00
3 November 2025	Revise standing motion (1.5); and confer with J. Walz re: same (0.2); legal research re: non-pro rata exchange and causes of action re: same (4.0).	D Litz	5.70	7,809.00
3 November 2025	Draft and revise standing motion (3.8); Analyze NEMT contract re: same (1.0); Analyze PCS contracts re: same (0.5); Analyze RPM contracts re: same (0.5); Research security interests re: same (1.2); Analyze V. Sachdev edits to standing motion re: same (0.5); Draft and revise proposed order to standing motion re: same (0.3).	R Beil	7.80	9,984.00
3 November 2025	Review documents for deposition of B. Gutierrez (1.4); emails with A. Chase re: same (0.2); call with Alix and W&C re: prepetition transactions (0.3); call with A. Chase and C. West re: same (0.2); call with G. Silnicki re: same (0.2); emails with W&C re: workstreams for investigation (0.5); update draft summary of prepetition transactions (0.7); emails with A. Hong re; same (0.1); emails with W&C re: deposition logistics for prepetition transactions (0.4); review documents flagged by J. Bourgault re: prepetition transactions (0.3); emails with J. Bourgault and A. Chase re: same (0.1); call with W&C re: depositions (0.7); emails with W&C re: same (0.2); review diligence re: draft complaint (0.9).	L Miranda	6.20	7,564.00
3 November 2025	Conduct substantive review of standing motion.	D Mago	0.70	693.00
3 November 2025	Review 1L security document (0.3); confer with W&C	G Zahiremami	1.70	1,683.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	team re: same (0.1); review potential litigation issue caselaw re: claims objection (0.6); review standing motion (0.7).			
3 November 2025	Review standing complaint (0.1); investigate legal question re: standing complaint (3.2).	J Walz	3.30	2,871.00
4 November 2025	Review standing motion.	S Greissman	1.10	2,750.00
4 November 2025	Conferences re: investigation (0.8); review correspondence re: causes of action (1.8).	G Pesce	2.60	5,460.00
4 November 2025	Reviewing standing motion (0.7); call with C. West re: challenges (0.3).	A Zatz	1.00	2,100.00
4 November 2025	Review/edit draft complaint and complaint rider (2.3); internal communications re: same (0.3); research re: potential claim (1.0); call with A. Zatz re: same (0.2).	C West	3.80	6,802.00
4 November 2025	Email among W&C re: standing motion complaint (0.4); call with A. Zatz re: investigation (0.3); call with V. Sachdev re: investigation (0.2).	A Chase	0.90	1,422.00
4 November 2025	Draft, review and revise complaint (0.7); call with R. Beil re: same (0.3); correspond with R. Beil, G. Zahiremami and D. Mago re: research (0.2); review precedent motions and complaints (0.6); review research re: standing motion from G. Zahiremami (0.3); research cases re: same (0.8); call with A. Chase re: discovery re: complaint (0.2); call with E. Smith re: same (0.5); call with G. Zahiremami re: research (0.2).	V Sachdev	3.80	5,396.00
4 November 2025	Emails with P. Rai, G. Silnicki, and J. Bourgault re: subsidiary guarantees (0.5); emails with C. West, A. Chase, L. Miranda and J. Walz re: edits to draft complaint (0.5).	A Hong	1.00	1,370.00
4 November 2025	Confer with J. Walz re: legal research and precedent review for standing motion (0.7); revise standing motion (2.5).	D Litz	3.20	4,384.00
4 November 2025	Draft and revise proposed complaint (3.9); Call with V. Sachdev standing motion and complaint (0.2); Research potential litigation issue cases re: complaint (1.5), research recent SD Tex cases re: potential litigation issue re: same (1.2).	R Beil	6.80	8,704.00
4 November 2025	Review follow up requests from V. Sachdev re: complaint (0.8); review standing motion and supplement with case law as applicable (1.8).	D Mago	2.60	2,574.00
4 November 2025	Review standing motion (0.7); conduct research re: code impairment (2.6); prepare summary of findings re: same and confer with A. Zatz re: same (0.6).	G Zahiremami	3.90	3,861.00
4 November 2025	Conduct research for standing motion (5.5); call with	J Walz	6.00	5,220.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	D. Litz re: same (0.4); coordination with Research team re: same (0.1).			
5 November 2025	Review revised standing motion draft.	S Greissman	0.60	1,500.00
5 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00
5 November 2025	Reviewing standing motion (1.0); meeting with G. Zahiremami re: diminution research (0.4); reviewing diminution research (0.4); call with R. Bennett re: challenges (0.3); call with C. West re: challenges (0.3); call with V. Sachdev re: challenges (0.4).	A Zatz	2.80	5,880.00
5 November 2025	Research re: potential claim and internal discussions re: same (0.9); internal discussions re: Subordination Agreement issues and research re: same (0.8); review rider to draft complaint (0.8).	C West	2.50	4,475.00
5 November 2025	Call with A. Zatz re: investigation (0.2); review revised complaint (1.4).	A Chase	1.60	2,528.00
5 November 2025	Consultation re: guarantor and security matters (0.2); related review of loan documents (0.2).	G Silnicki	0.40	588.00
5 November 2025	Edit and revise complaint multiple times (3.9); research re: same (0.3); correspond with Alix re: standing motion (0.2); review and revise updated standing motion (0.2); call with A. Zatz re: standing motion comments (0.4); confer with Smith re: depositions (0.1); confer with A. Zatz re: same (0.1); call with C. Shore re: same (0.5); correspond with R. Beil and litigation team re: UHC proceeds (0.2).	V Sachdev	5.90	8,378.00
5 November 2025	Emails with L. Miranda, P. Rai, and G. Silnicki re: guarantee issues for complaint.	A Hong	0.30	411.00
5 November 2025	Revise fact section of draft standing motion (6.0); legal research re: defenses to analyze strength of arguments (1.4).	D Litz	7.40	10,138.00
5 November 2025	Draft and revise standing motion (2.6), research ModivCare public financials re: same (1.3); Draft and revise complaint (2.7), analyze and answer V. Sachdev edits and comments re: same (0.5); Draft prospective deposition questions re: same (0.6).	R Beil	7.70	9,856.00
5 November 2025	Revise complaint on prepetition transactions with comments from C. West (1.8); emails with A. Hong and A. Chase re: same (0.1).	L Miranda	1.90	2,318.00
5 November 2025	Review of guarantors under unsecured notes and second lien facility obligations.	P Rai	0.50	555.00
5 November 2025	Analyze Gutierrez deposition notes (0.2); analyze standing motion (0.8).	D Mago	1.00	990.00
5 November 2025	Review and revise complaint (1.4); email same to A.	G Zahiremami	2.30	2,277.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Zatz (0.1); confer with A. Zatz re: diminution (0.3); review materials re: same (0.5).			
5 November 2025	Review precedent standing motion (0.6); review of relevant arguments in standing motion (0.2); legal research for standing motion (2.7).	J Walz	3.50	3,045.00
6 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00
6 November 2025	Revising complaint (6.6) and related correspondence (0.2).	A Zatz	6.80	14,280.00
6 November 2025	Analyze draft complaint and research/communications re: same.	C West	2.80	5,012.00
6 November 2025	Revise standing complaint (2.2); discuss same with C. West (0.6).	A Chase	2.80	4,424.00
6 November 2025	Review and edit standing motion (1.4); research re: same (0.5); correspond with R. Beil and G. Zahiremami re: same (0.1); correspond with A. Zatz re: complaint and standing motion (0.1).	V Sachdev	2.10	2,982.00
6 November 2025	Revise draft standing motion.	D Litz	5.10	6,987.00
6 November 2025	Conduct research in support of investigation of causes of action.	J Yoo	0.40	548.00
6 November 2025	Draft and revise standing motion (2.4), analyze V. Sachdev edits re: same (0.3), research potential litigation issue distinguishable cases re: same (1.5).	R Beil	4.20	5,376.00
6 November 2025	Analyze motion for derivative standing re: factual allegations (1.2); analyze motion for derivative standing re: argument section (0.5); analyze complaint re: factual allegations (0.7); analyze complaint re: causes of action (0.6); legal research re: precedent standing motions (0.3); legal research re: precedent standing complaints (0.2); outline argument for cause of action two in standing motion (0.8); call with D. Litz re: same (0.2); draft argument section re: same (1.8).	D Mago	6.30	6,237.00
7 November 2025	Conferences with W&C core team re: investigation and claims.	G Pesce	0.80	1,680.00
7 November 2025	Review of Invitae standing papers (0.4); and related internal call (0.3).	A Zatz	0.70	1,470.00
7 November 2025	Internal call to discuss complaint (0.5); review legal research re: same (1.5); internal communications re: same (0.2); review/edit draft complaint (1.4); review draft standing motion (0.7).	C West	4.30	7,697.00
7 November 2025	Call among W&C re: standing complaint (0.5); revise standing complaint (2.9); call with C. West re: same (0.1).	A Chase	3.50	5,530.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 November 2025	Review and edit standing motion (0.9); research re: same (0.2); correspond with R. Beil and G. Zahiremami re: same (0.1); review and comment on revised drafts of standing motion and complaint (0.5); correspond with R. Beil re: same (0.1); correspond with Alix and R. Beil re: analysis re: standing motion (0.2).	V Sachdev	2.00	2,840.00
7 November 2025	Call with A. Zatz, C. West, A. Chase, D. Litz, and J. Walz re: complaint (0.5); revise chart re: investigation analysis (1.0).	A Hong	1.50	2,055.00
7 November 2025	Meeting with A. Zatz, C. West, A. Chase, A. Hong, and J. Walz re: standing motion and complaint (0.7); review and revise draft standing motion (3.2); confer with W&C team re: same (0.4).	D Litz	4.30	5,891.00
7 November 2025	Review research re: investigation on potential causes of action.	J Yoo	1.60	2,192.00
7 November 2025	Draft and revise Standing Motion (1.2); Draft and revise Complaint (1.4); analyze 'Project Nuggets' production and flag and cache hot documents for litigation review (1.0).	R Beil	3.60	4,608.00
7 November 2025	Review comments from D. Litz re: standing motion (0.6); legal research re: precedent standing motions (2.1); legal research re: precedent standing complaints (0.9); legal research re: case law for cause of action two (2.1); revise standing motion (0.8).	D Mago	6.50	6,435.00
7 November 2025	Draft standing motion.	J Walz	7.90	6,873.00
8 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00
8 November 2025	Review/edit complaint and motion re: same (3.3); internal research/communications re: same (0.5).	C West	3.80	6,802.00
8 November 2025	Revise standing complaint (1.2); confer with C. West re: same (0.6).	A Chase	1.80	2,844.00
8 November 2025	Revise and draft deposition questions (1.8); correspond with Beil re: same (0.1); correspond with Alix and W&C team re: analysis (0.2).	V Sachdev	2.10	2,982.00
9 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00
9 November 2025	Revising challenge complaint (0.5); revising standing motion (2.5).	A Zatz	3.00	6,300.00
9 November 2025	Review/edit complaint and standing motion re: transaction (1.9); research re: same (0.6); internal emails re: same (0.2).	C West	2.70	4,833.00
9 November 2025	Confer with A. Chase, J. Walz and R. Beil re deposition questions (0.2); correspond with R. Beil re potential litigation papers and process for filing (0.1).	V Sachdev	0.30	426.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 November 2025	Emails with C. West, A. Zatz, A. Chase, and J. Walz re: revisions to complaint (0.4); revise complaint (1.4); revise chart re: analysis of prior transaction (0.7).	A Hong	2.50	3,425.00
9 November 2025	Revise draft standing motion.	D Litz	2.70	3,699.00
9 November 2025	Draft and revise deposition questions (0.6); Analyze facts/cites and draft explanatory chart of outstanding information workstreams re: complaint and standing motion (3.8).	R Beil	4.40	5,632.00
9 November 2025	Review C. West's revisions to complaint (0.6); revise standing motion per comments from C. West to complaint (1.2); draft summary email to D. Litz re: same (0.1).	D Mago	1.90	1,881.00
9 November 2025	Revise standing motion.	J Walz	6.60	5,742.00
10 November 2025	Internal conference call with A. Zatz and litigation team re: standing motion and complaints.	S Greissman	0.50	1,250.00
10 November 2025	Reviewing hot documents for standing motion (1.6); internal call re: potential litigation (0.7); reviewing Shephard deposition transcript (1.3); and reviewing independent investigation report (0.6).	A Zatz	4.20	8,820.00
10 November 2025	Call with C. Shore re: potential litigation (0.2); review/edit complaint and motion re: same and internal research/communications re: same (2.5); internal team call re: same (0.6); review/analyze D. Silvers report and prepare for D. Silvers' deposition (1.2).	C West	4.50	8,055.00
10 November 2025	Revise draft standing complaint (3.1); review and analyze Silvers report (0.4); call with C. Shore re: same (0.2); review analysis of claims against individual defendants from A. Hong (2.7).	A Chase	6.40	10,112.00
10 November 2025	Listen to portions of Shepard deposition relevant to potential litigation (0.6); review real-time feed re: same (0.5); confer with R. Beil and G. Zahiremami re: same (0.2); correspond with J. Zakia, A. Zatz and J. Walz re: Sampson deposition (1.1); review edited potential litigation papers from R. Beil (0.4); correspond with R. Beil re: same (0.2).	V Sachdev	3.00	4,260.00
10 November 2025	Call with S. Greissman, C. West, A. Zatz, A. Chase, D. Litz, D. Mago, and J. Walz re: complaint (0.7); revise draft complaint (2.5); emails with D. Litz and D. Mago re: complaint (0.3); emails with C. West and A. Chase re: complaint (0.2); emails with L. Miranda re: Silvers report (0.2); review D. Silvers declaration re: special committee investigation (0.5).	A Hong	4.40	6,028.00
10 November 2025	Revise fact section to standing motion (2.6); prepare chart of key events/dates for complaint (4.9); meeting with S. Greissman, A. Zatz, C. West, A. Chase, J. Walz, D. Mago, A. Hong re: complaint (0.7); revise argument section of standing motion (1.6).	D Litz	9.80	13,426.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 November 2025	Conduct research re: potential causes of action (3.6); confer with W&C team re: same (0.2).	J Yoo	3.80	5,206.00
10 November 2025	Draft and revise standing motion (2.0); analyze Shepard raw deposition transcript re: same (1.5); Draft and revise complaint (1.0); analyze Project Nuggets production (1.3).	R Beil	5.80	7,424.00
10 November 2025	Review declaration by D. Silvers re: investigation (1.2); draft summary for Committee re: same (0.9).	L Miranda	2.10	2,562.00
10 November 2025	Analyze revised complaint (1.2); review comments from A. Zatz to same (0.5); analyze revisions to standing motion (1.1); revise standing motion (1.2); meeting with S. Greissman, A. Zatz, C. West, and W&C complaint team re: adversary complaint update (0.7).	D Mago	4.70	4,653.00
10 November 2025	Conduct research re: diminution and adequate protection (2.8); conduct research re: potential estate claims (0.3); email to D. Litz re: same (0.1).	G Zahiremami	3.20	3,168.00
10 November 2025	Review revisions to standing motion (0.2); coordination with D. Litz re: same (0.1); call with W&C team re: standing complaint and motion (1.0); discussion with D. Litz re: standing motion (0.3); revise same (0.5).	J Walz	2.10	1,827.00
10 November 2025	Locate requested precedent for D. Litz.	D Hirshorn	0.10	49.00
11 November 2025	Review standing motion (1.2); review standing complaint (1.4); review complaint (1.9); review standing motion (0.8); internal conference call re: potential litigation and follow up (1.2); conference call with Alix re: LME data and potential litigation (0.3); review LME data re: potential litigation claim (0.8).	S Greissman	7.60	19,000.00
11 November 2025	Revising complaint (6.2); reviewing Invitae Committee standing papers (1.6); update e-mail re: challenges (0.3); and reviewing hot documents (2.9).	A Zatz	11.00	23,100.00
11 November 2025	Review draft standing motion (1.1); prepare markup of same (0.5).	E Feld	1.60	2,864.00
11 November 2025	Review/edit draft standing motion and internal meetings/calls re: same (6.8); review Silvers declaration and other D. Silvers document and preparation for D. Silvers deposition (3.3).	C West	10.10	18,079.00
11 November 2025	Revise standing complaint (2.4); revise standing motion (3.7); confer among W&C re: standing complaint (1.1); call with C. West re: same (0.3); draft letter re: Silvers report (3.0); review research from L. Miranda re: same (0.5).	A Chase	11.00	17,380.00
11 November 2025	Listen to portions of Sampson deposition relevant to potential litigation (0.7); correspond with A. Chase, R. Beil and J. Walz re: same (0.1); confer with R. Beil and G. Zahiremami re: same (0.2); correspond with S.	V Sachdev	2.10	2,982.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Greissman and L. Feld re: status of potential litigation papers (0.1); confer with A. Zatz re: same (0.2); correspond with D. Litz re: A. Zatz' outstanding questions (0.1); correspond with Alix re: analysis for potential litigation (0.2); review L. Feld's comments to standing motion (0.3) and correspond with G. Zahiremami re: incorporating same (0.2).			
11 November 2025	Emails with A. Chase, D. Litz, and D. Mago re: complaint (0.5); revise draft complaint (2.4); emails with A. Zatz, A. Chase, D. Litz, and team re: challenges (0.5); factual research re: David Mounts Gonzales (0.5); further revise draft complaint (2.1); emails with C. Shore, J. Zakia, S. Greissman, C. West, A. Zatz, and team re: complaint (0.2).	A Hong	6.20	8,494.00
11 November 2025	Revise argument section of standing motion (0.7); draft rider for standing motion re: special committee investigation report (1.7); revise standing motion analysis of facts and argument (2.9); confer with W&C associate team re: questions re: potential litigation (1.0); revise fact chart (0.4); confer with Alix team re: cap structure chart and revise same (0.6).	D Litz	7.30	10,001.00
11 November 2025	Confer with W&C team re: investigation into potential causes of action (0.1); confer with W&C team re: research in support of potential causes of action (0.4); review and conduct additional research re: potential causes of action (2.8); summarize and send findings of same (1.5).	J Yoo	4.80	6,576.00
11 November 2025	Conduct cite check and analysis of potential litigation issue cases re: standing motion.	R Beil	3.00	3,840.00
11 November 2025	Revise summary of D. Silvers' declaration re: investigation with comments from A. Chase (0.2); email to Committee re; same (0.2); email with C. West and A. Chase re: lenders in prepetition transactions (0.3); email with D. Litz re: same (0.2); respond to A. Zatz re: standing complaint (0.9).	L Miranda	1.80	2,196.00
11 November 2025	Analyze memorandum re: prepetition transaction (0.6); analyze complaint re: key dates (0.7); draft key dates chart (2.0); review revised standing motion (0.5); review comments from E. Feld and G. Zahiremami re: same (0.1); review comments from A. Chase and D. Litz re: insider status (0.2).	D Mago	4.10	4,059.00
11 November 2025	Review and revise standing motion (5.4); emails and confer with W&C team re: same (0.4); review credit agreements re: same (0.9).	G Zahiremami	6.70	6,633.00
11 November 2025	Research matters for complaint.	J Bourgault	4.10	3,567.00
11 November 2025	Research for standing motion.	B Kakani	2.10	1,827.00
12 November 2025	Review complaint (1.6); review standing motion (1.3); internal conference call re: same with A. Zatz and J. Zakia (0.5); internal conference call with C. Shore re:	S Greissman	5.50	13,750.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	same (0.2); review standing motion (1.9).			
12 November 2025	Revising complaint (3.2); internal call re: same (0.4); revising standing motion (5.5); revising preliminary statement to complaint (0.3); related call with C. West (0.2); and call with Alix re: potential litigation (0.3).	A Zatz	9.90	20,790.00
12 November 2025	Prepare for D. Silvers deposition (7.5); internal communications/meetings re: same (2.5); review/draft/edit standing complaint and motion (2.8); call with Alix re: same (0.3).	C West	13.10	23,449.00
12 November 2025	Call among W&C and Alix re: standing complaint (0.3); discuss same with L. Miranda and C. West (0.4); review standing complaint (2.3).	A Chase	3.00	4,740.00
12 November 2025	Confer with A. Zatz re: edits to potential litigation papers (0.2); draft edits to same (1.6); confer with R. Beil and G. Zahiremami re: same (0.2); correspond with A. Zatz re: same (0.1); correspondence with Alix, R. Beil, D. Mago, D. Litz, and G. Zahiremami re: same (0.2); confer with G. Zahiremami re: same (0.2).	V Sachdev	2.50	3,550.00
12 November 2025	Revise complaint (1.9); confer with L. Miranda re: same (0.4); legal research re: potential claims (0.5); emails with A. Zatz and D. Litz re: same (0.5); call with A. Zatz and D. Litz re: complaint (0.5); call with Zatz re: potential claims research (0.1); call with AlixPartners team re: complaint (0.3); emails with E. Smith, AlixPartners team, and W&C Practice Technology team re: reliance materials for expert reports (0.7); emails with A. Zatz, D. Litz, L. Miranda, and C. Chitwan re: potential claims research (0.5); factual research re: downside cases for complaint (1.6); draft summary re: retained causes of action under Plan (1.3).	A Hong	8.30	11,371.00
12 November 2025	Revise fact section of standing motion to conform to complaint (3.2); confer with W&C team re: same (0.3); draft and revise argument analysis (3.0).	D Litz	6.50	8,905.00
12 November 2025	Analyze and confirm accuracy of cited cases re: standing motion (1.2); analyze E. Feld edits re: same (0.5); draft and revise motion re: same (1.0); Analyze A. Zatz edits re: complaint (0.5); draft and revise complaint re: same (1.0).	R Beil	4.20	5,376.00
12 November 2025	Call among W&C and Alix re: standing complaint (0.3); discuss same with A. Chase and C. West (0.4); revise standing complaint with comments from W&C (4.3); confer with D. Litz re: same (0.3); review diligence re: standing complaint (3.6); email with S. Ludovici re: parties to standing complaint (0.2); conduct factual research into parties for standing complaint (2.2); emails with W&C re: standing complaint (0.4); call with H. Ahmed re: parties section of standing complaint (0.2); email with H. Ahmed re: same (0.2); emails with Alix re: standing complaint (0.2).	L Miranda	12.30	15,006.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 November 2025	Research state of incorporations for various entities to be listed in Complaint.	H Ahmed	3.50	3,465.00
12 November 2025	Correspondence with D. Litz re: adversary complaint revisions (0.1); legal research re: cause of action in complaint (3.9); draft summary re: same (0.5); analyze H. Sampson rough deposition transcript (1.3).	D Mago	5.80	5,742.00
12 November 2025	Review and revise standing motion (4.8); confer with W&C team re: same (0.5); further review standing motion (0.8); confer and emails with D. Mago re: same (0.2); confer with E. Smith re: deposition preparation (0.2).	G Zahiremami	6.50	6,435.00
12 November 2025	Research for standing motion.	B Kakani	4.60	4,002.00
12 November 2025	Revise standing motion.	J Walz	2.30	2,001.00
12 November 2025	Emails re: conflicts check for defendants.	S Ludovici	0.10	111.00
13 November 2025	Review second complaint (0.6); review second standing motion (0.9); review first complaint (0.7); review first standing motion (0.4).	S Greissman	2.60	6,500.00
13 November 2025	Review and revise standing motion and draft complaint (4.0); confer with S. Greissman re: same (0.3).	J Zakia	4.30	9,460.00
13 November 2025	Revising complaint and standing motion.	A Zatz	13.60	28,560.00
13 November 2025	Review/revise complaint (1.6); correspond with A. Zatz, S. Greissman re: comments to same (0.2).	E Feld	1.80	3,222.00
13 November 2025	Preparation for D. Silvers deposition (1.5); attend D. Silvers deposition (8.8); internal follow-up meetings re: same (0.4); call with Alix re: standing motion (0.3).	C West	11.00	19,690.00
13 November 2025	Discuss standing complaint with W&C and Alix (0.3); meet with L. Miranda and A. Hong to discuss standing motion (0.5); call among W&C to discuss standing motion and complaint (0.7).	A Chase	1.50	2,370.00
13 November 2025	Review and comment on updated potential litigation papers (2.4); call with C. Shore, S. Greissman, A. Zatz, R. Beil, and G. Zahiremami re: potential litigation papers (0.6); confer with R. Beil and G. Zahiremami re: same (0.3); call with A. Panda (Alix) and R. Beil re: analysis re: potential litigation (0.3).	V Sachdev	3.60	5,112.00
13 November 2025	Call with A. Zatz, C. West, A. Chase, L. Miranda, and Alix team re: complaint (0.5); call with Zatz, A. Chase, D. Litz, L. Miranda, and J. Walz re: complaint (0.7); review rough deposition transcript from Silvers deposition for complaint (2.8); revise draft complaint (1.9).	A Hong	5.90	8,083.00
13 November 2025	Revise draft standing motion per A. Zatz, C. West, and other comments (3.7); review cases to analyze	D Litz	14.10	19,317.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	arguments in standing motion (3.0); incorporate revisions to fact section of standing motion to conform to draft complaint (2.2); revise argument section of standing motion per case law research (2.2); confer with W&C team re: value argument (0.8); legal research re: value argument for standing motion (1.7); call with W&C and Alix team re: standing motion and complaint (0.5).			
13 November 2025	Attend call with W&C partners re: standing motion (0.5); analyze V. Sachdev edits re: same (1.0); draft and revise motion re: same (1.5); research case law re: same (0.5); Draft and revise complaint re: same (1.5); Analyze Sampson Deposition and add cites to motion and complaint (1.0); analyze Shephard Deposition and add cites to motion and complaint re: same (1.0).	R Beil	7.00	8,960.00
13 November 2025	Review and revise complaint with comments from W&C (various iterations) (4.4); review diligence re: same (1.3); meet with W&C and Alix re: draft complaint (0.3); call with W&C re: complaint and standing motion (0.7); email with A. Zatz re: lenders in prepetition transactions (0.1); continue to revise complaint on prepetition transactions (4.8); emails with Alix re: same (0.3); email with D. Hirshorn re: hearing transcripts (0.2).	L Miranda	12.10	14,762.00
13 November 2025	Research state of incorporations for various entities to be listed in Complaint (1.0); revise Complaint to include entities and their states of incorporations (1.5).	H Ahmed	2.50	2,475.00
13 November 2025	Analyze A. Zatz comments to standing motion (0.3); analyze revised complaint (0.7); revise standing motion (2.5); correspondence with D. Litz re: same (0.1); revise standing motion per comments from D. Litz (1.3); call with W&C and Alix partners re: complaint (0.7); analyzed revised complaint (0.5); conduct substantive cite check re: standing motion (6.2).	D Mago	12.30	12,177.00
13 November 2025	Review and revise standing motion (5.3); calls and confer with W&C team re: same (0.8).	G Zahiremami	6.10	6,039.00
13 November 2025	Revise standing motion (3.4); call with Alix team re: standing complaint arguments (0.6); Call with standing complaint team re: drafting update (0.5).	J Walz	4.50	3,915.00
13 November 2025	Email with L. Miranda and others re: conflicts.	S Ludovici	0.10	111.00
14 November 2025	Internal team conference call re: investigations (0.9); review first standing and complaint pleadings (1.5); review second standing and complaint pleadings (1.5).	S Greissman	3.90	9,750.00
14 November 2025	Review and revise standing motion and complaint.	J Zakia	3.10	6,820.00
14 November 2025	Revising complaint and standing motion.	A Zatz	13.20	27,720.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
14 November 2025	Review/edit standing motion (3.1); review/edit complaint (4.0); calls/emails with W&C team re: same (1.0).	C West	8.10	14,499.00
14 November 2025	Call with A. Zatz, C. West, S. Greisman (0.4); confer among W&C re: standing motion and complaint filings (1.6); revise and finalize complaint for filing (4.9).	A Chase	6.90	10,902.00
14 November 2025	Correspond with R. Beil re: deposition cites and argument for potential litigation papers (0.1); review C. Shore's comments to draft and analyze best approach to address same (0.4); correspond with A. Zatz and R. Beil re: same (0.2); correspond with A. Chase, D. Litz, and R. Beil re: plan for filing (0.2); confer with R. Beil re: same (0.1); review and comment on motion and complaint, including line review for accuracy in advance of filing (3.9); correspond with R. Beil re: same and re: open items for filing (0.2); call with R. Beil re: same (0.1); call with A. Zatz re: same (0.1); correspond with A. Zatz re: same (0.1).	V Sachdev	5.40	7,668.00
14 November 2025	Pull relevant testimony from Silvers deposition for complaint (0.9); revise standing complaint re: prior transaction (1.3); revise standing motion re: prior transaction (1.3); emails with D. Litz and L. Miranda re: standing motion and complaint (0.4); review draft complaint (0.6).	A Hong	4.50	6,165.00
14 November 2025	Review case law re: value and incorporate into standing motion draft (2.7); review precedent standing motion to analyze arguments (1.2); confer with A. Zatz re: standing motion comments and draft of same (0.4); revise standing motion per A. Zatz comments and to conform to revised draft complaint (4.3); prepare standing motion for filing (0.7); cite check standing motion (0.7); meeting with Committee re: standing motion and complaint (0.4); call with W&C team re: standing motion and complaint (0.5).	D Litz	10.90	14,933.00
14 November 2025	Analyze partner edits re: standing motion (1.0); analyze V. Sachdev edits re: same (0.3); draft and finalize proposed order re: same (0.3); conduct citation and quality check re: same (2.5); draft, revise and finalize for filing re: same (3.0); Analyze partner edits re: complaint (0.5); conduct citation and quality check re: same (2.5); draft and finalize schedules and exhibits re: same (1.0); draft, revise and finalize for filing re: same (3.0).	R Beil	14.10	18,048.00
14 November 2025	Revise draft complaint with comments from W&C (various iterations) (4.9); review standing motion re: same (various iterations) (2.7); review diligence re: same (2.1); emails with W&C re: same (0.7); confer with A. Zatz re: draft complaint (0.4); emails with Alix re: draft complaint (0.6); call with C. West re: same (0.2); call with C. Shore re: same (0.1).	L Miranda	11.70	14,274.00
14 November 2025	Analyze multiple revisions to standing motion (0.8); multiple revisions to same (1.1); analyze multiple revisions to complaint (0.5); continue substantive cite	D Mago	7.80	7,722.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	check (1.2); legal research re: complaint cause of action (3.7); substantial correspondence with D. Litz re: same (0.2); analyze docket for previous filings re: complaint (0.3).			
14 November 2025	Confer with A. Zatz re: potential claim research (0.1); conduct research and address follow up re: same (1.8); confer with R. Beil re: potential litigation (0.1); review and revise and cite check potential litigation motion (3.8).	G Zahiremami	5.80	5,742.00
14 November 2025	Coordination with W&C team re: standing motion (0.3); revise standing motion (10.5).	J Walz	10.80	9,396.00
14 November 2025	Assist A. Venes with Table of Contents on Standing Motion.	D Hirshorn	1.00	490.00
14 November 2025	Review and respond to team emails re: assistance with submission of motions for standing, and proposed adv. complaints (0.1); generate TOCs/TOAs in motions for standing (2.1); prepare for, and assist with e-filing of motions for standing/attachments (2.0); confirm filings with W&C team (0.1); serve affected parties and Chambers via email (0.3); update pleadings files (0.1).	A Venes	4.70	2,303.00
14 November 2025	Edit standing motion for A. Zatz.	K Wick	0.60	294.00
15 November 2025	Internal correspondence re: standing motions.	A Zatz	0.20	420.00
15 November 2025	Preparation for 1L deposition and internal communications re: same (2.8); review/edit draft letter to Quinn Emanuel re: D. Silvers' deposition and declaration (2.0).	C West	4.80	8,592.00
15 November 2025	Correspondence with A. Zatz, S. Greissman, L. Miranda, A. Hong, G. Pesce re: distribution of standing motion.	V Sachdev	0.10	142.00
15 November 2025	Review protective order (0.5); emails with G. Pesce, S. Greissman, A. Zatz, A. Chase and L. Miranda re: standing motions and complaints (0.3); emails to counsel for Debtors, First Lien Lenders, and U.S. Trustee re: standing motion (0.2); emails with A. Chase, L. Miranda, R. Beil, and J. Walz re: redactions to standing motions and complaints re: prior transaction and potential litigation (0.6); propose redactions to standing motion and complaint (2.6); review proposed redactions to standing motion and complaint re: potential litigation (1.4).	A Hong	5.60	7,672.00
15 November 2025	Analyze Sampson and Shepard Deposition Transcripts re: redactions (0.6); apply redactions to Motion and Complaint re: same (0.5).	R Beil	1.10	1,408.00
15 November 2025	Mark redactions in standing complaint.	J Walz	1.90	1,653.00
16 November 2025	Preparation for 1L deposition (10.3); internal communications re: same (2.5); team call re: case	C West	13.70	24,523.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	status and strategy (0.9).			
16 November 2025	Revise redactions on both standing motions.	A Chase	6.80	10,744.00
16 November 2025	Emails with A. Chase, L. Miranda, and R. Beil re: proposed redactions to standing motions and complaints re: prior transaction and potential litigation (0.5); research re: redaction issues (0.8); revise proposed redactions to standing motion and complaint (1.5); revise proposed redactions to potential litigation papers (0.5).	A Hong	3.30	4,521.00
16 November 2025	Revise redactions of standing motion (0.3); revise redactions of complaint re: same (0.2).	R Beil	0.50	640.00
17 November 2025	Calls with W&C and Alix teams re: standing motions.	J Shore	0.40	1,000.00
17 November 2025	Review correspondence with W&C and Alix team re: causes of action.	G Pesce	0.80	1,680.00
17 November 2025	Preparation for 1L deposition (1.5); attend 1L deposition (8.3).	C West	9.80	17,542.00
17 November 2025	Revise letter to Quinn Emanuel re: D. Silvers declaration.	A Chase	0.50	790.00
17 November 2025	Review and analyze deposition questions from R. Beil (0.4); call with A. Zatz re: same (0.2); correspond with R. Beil and L. Miranda re: same (0.2); confer with R. Beil re: reply and related research (0.2).	V Sachdev	1.00	1,420.00
17 November 2025	Emails with A. Chase, L. Miranda, and R. Beil re: filing redacted versions of standing motions (0.1); coordinate with A. Venes re: filing and service of redacted versions of standing motions and complaints (0.3); emails with C. West, A. Chase, and L. Miranda re: retained causes of action (0.3); review Plan supplement, schedule of retained assets and liabilities (0.9); draft summary re: retained causes of action (0.4).	A Hong	2.00	2,740.00
17 November 2025	Analyze Plan Supplement Schedule of Retained Causes of Action re: Excluded Assets.	R Beil	0.60	768.00
17 November 2025	Assist with redacting/e-filing of Committee's motions for standing per A. Hong (0.6); correspond with A. Hong re: same (0.1); update pleadings files (0.1); perform email service of filed motions (0.2).	A Venes	1.00	490.00
18 November 2025	Call with Alix re: strategy (partial) (0.3); revise/edit letter to QE re: Silvers declaration and internal emails re: same (0.8); review research re: prior transaction (1.4); review deposition transcripts for confirmation objection and standing motion reply (1.0).	C West	3.50	6,265.00
18 November 2025	Revise and finalize letter to Quinn Emanuel re: D. Silvers Declaration.	A Chase	2.20	3,476.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 November 2025	Analyze cases re: reply to opposition.	R Beil	1.00	1,280.00
18 November 2025	Research director independence (1.8); Review First Lien Lender production (1.4); Review standing trial work streams & key arguments (1.0).	J Bourgault	4.20	3,654.00
19 November 2025	Calls with W&C and Alix teams re: claim objection and standing.	J Shore	0.50	1,250.00
19 November 2025	Meeting with A. Chase re: litigation status (0.9); W&C team call re: meet and confer and other litigation issues (0.5); meet and confer with Debtors' counsel and 1Ls' counsel (0.8); call with C. Shore re: Silvers investigation (0.2); review 1Ls' reservation of rights and internal emails re: same (0.2); review witness and exhibit lists and research re: same (0.8); fact research for standing motion reply (0.8).	C West	4.20	7,518.00
19 November 2025	Attend litigation team workstream meeting (0.5); Conduct document review (2.1); Prepare D. Gonzales deposition designations (4.0); Prepare for C. Shandler deposition (0.4); Research issues for confirmation objection (7.4).	J Bourgault	14.40	12,528.00
20 November 2025	Internal call re: reply to objections to standing motions.	A Zatz	0.40	840.00
20 November 2025	Meeting with A. Chase re: discovery (0.4); call with A. Zatz et al re: Plan objection (0.5); call with A. Zatz et al. re: standing motion reply (0.3); research/drafting re: same (1.2); review deposition transcripts for dispute re: Silvers' report and confirmation issues (1.0); review confirmation objection (0.6); internal communications re: standing motions (0.4); weekly Committee call (0.6).	C West	5.00	8,950.00
20 November 2025	Discuss standing motion reply with C. West, A. Zatz, D. Litz (0.3); draft letter in advance of pretrial conference (2.3).	A Chase	2.60	4,108.00
20 November 2025	Meeting with A. Zatz, C. West, A. Chase re: reply brief.	D Litz	0.40	548.00
21 November 2025	Prepare for pre-trial conference and communications with C. Shore re: same (0.5); pre-trial conference (0.3); follow-up call with C. Shore and A. Chase re: same (0.3); follow up call with A. Chase (0.1); litigation team call (0.4); review emails with Debtors' counsel re: 3rd party depositions and call with C. Shore re: same (0.3); review draft letter to Quinn and emails re: same (0.4); research for reply re: standing motion (1.3); review draft sections of confirmation objection and emails re: same (0.7).	C West	4.30	7,697.00
21 November 2025	Call with C. West and C. Shore re: Silvers investigation (0.4); call with L. Miranda, J. Yoo re: investigation discovery (0.3).	A Chase	0.70	1,106.00
22 November 2025	Review correspondence re: causes of action.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
22 November 2025	Team strategy call (1.0); review draft letter to Court re: Silvers declaration (0.5); draft reply brief re: standing motion and research re: same; (0.9).	C West	2.40	4,296.00
22 November 2025	Review and revise letter brief re: Silvers investigation (4.6); conduct research re: same (0.8); email with L. Miranda and C. Chitwan re: letter brief (0.3).	A Chase	5.70	9,006.00
22 November 2025	Legal research re: state law causes of action for standing motion reply brief.	D Litz	3.00	4,110.00
23 November 2025	Revising supplemental potential litigation.	A Zatz	1.50	3,150.00
23 November 2025	Review/edit letter brief to Court re: Silvers report and research and internal communications re: same.	C West	1.80	3,222.00
23 November 2025	Review updated draft letter brief re: Silvers Declaration (0.6); email among litigation team re: same (0.2).	A Chase	0.80	1,264.00
23 November 2025	Respond to query re: excluded collateral, and related review of loan documents.	G Silnicki	0.20	294.00
23 November 2025	Call with G. Zahiremami re: supplemental challenge (0.2); confer with R. Beil re: same (0.1); call with R. Beil re: same (0.1); call with A. Zatz re: same (0.1); call with D. Mago re: same (0.1); draft supplemental challenge (2.2); distribute same (0.1).	V Sachdev	2.90	4,118.00
23 November 2025	Conduct document review re: ownership of Mercury Joint Venture (1.7); correspondence with V. Sachdev re: same (0.1); analyze first lien credit agreement re: excluded assets (0.7); correspondence with V. Sachdev re: same (0.1); correspondence with G. Silnicki re: same (0.1); draft shell supplemental challenge (0.3).	D Mago	3.00	2,970.00
23 November 2025	Calls with A. Sachdev re: supplemental potential litigation (0.5); conduct research and prepare arguments re: same (1.2); call with R. Beil re: same (0.2).	G Zahiremami	1.90	1,881.00
24 November 2025	Revising supplemental potential litigation.	A Zatz	0.60	1,260.00
24 November 2025	Review/edit letter brief re: Quinn report and research/internal communications re: same.	C West	3.80	6,802.00
24 November 2025	Email among W&C re: standing motion reply (0.6); review Silvers declaration (0.3); review and revise letter brief re: Silvers declaration (3.1); confer with C. West and L. Miranda re: same (0.7).	A Chase	4.70	7,426.00
24 November 2025	Respond to query re: excluded collateral, and related review of loan documents.	G Silnicki	0.30	441.00
24 November 2025	Review and address A. Zatz's comments to supplemental potential litigation (0.2); distribute same to W&C and Alix teams (0.1); delegate outstanding	V Sachdev	7.20	10,224.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	questions on supplemental potential litigation to team (0.6); review schedules and statements (0.3); call with R. Beil re: same (0.1); call with C. Koster re: notice (0.3); call with C. Shore re: comments to supplement (0.1); revise supplemental challenge per comments received (1.7); review pleadings and docket re: same (1.1); call with D. Mago re: same (0.1); correspond with A. Zatz re: same (0.2); correspond with R. Beil re: same (0.1); correspond with Alix re: same (0.1); review revised research from R. Beil (0.1); incorporate same into draft (0.1); distribute same to A. Zatz (0.2); review and incorporate comments from C. Shore (0.2): review (0.1) and incorporate (0.1) revised Plan supplement into potential litigation supplement; distribute same to A. Zatz (0.2); correspond with A. Zatz re: amendments to supplement and distribution to Committee (0.1); distribute to Committee (0.2); correspond with D. Hirshorn and A. Venes re: filing (0.1); review revisions to supplement from R. Beil (0.3); correspond with R. Beil re: filing (0.1); revise per comments from Zatz (0.2); review and file final supplement (0.2).			
24 November 2025	Legal research re: choice of law for prior transaction for potential reply brief issues (0.8); review letter re: Quinn report (0.3).	D Litz	1.10	1,507.00
24 November 2025	Analyze SOFAs and Schedules re: disclosed lawsuits (1.0); correspondence with V. Sachdev re: same (0.3); research outstanding lawsuits re: same (1.0); Draft and revise supplement re: supplemental potential litigation (0.6); conduct citation and quality check re: same (1.0); research NY Uniform Commercial Code perfection of commercial tort claims re: same (1.2); finalize and file same (0.8).	R Beil	5.90	7,552.00
24 November 2025	Conduct legal research re: conflict of laws (2.2); draft email memorandum to A. Chase and D. Litz re: same (0.7).	D Mago	2.90	2,871.00
24 November 2025	Confer with A. Zatz re: diminution (0.1); review research re: same (0.2).	G Zahiremami	0.30	297.00
24 November 2025	Pull deposition testimony for potential litigation.	J Bourgault	1.30	1,131.00
25 November 2025	Advisor pre-call (0.3); Committee call (0.5); review Quinn brief re: Quinn Report and research re: same (3.2); prepare for hearing on exclusion of Quinn Report / Silvers testimony (2.5); call with C. Shore re: same (0.5); argue at hearing (0.5); internal follow-up calls re: same (0.2); meet and confer with Debtors' counsel re: various pre-trial matters (0.3).	C West	8.00	14,320.00
26 November 2025	Email with V. Sachdev re: causes of action.	A Chase	0.20	316.00
26 November 2025	Review Quinn report and presentation to Board re: D. Silvers investigation.	A Hong	1.00	1,370.00
26 November 2025	Review Quinn report re: investigation.	L Miranda	0.90	1,098.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 November 2025	Conduct research re: adequate protection and equitable consideration.	G Zahiremami	0.80	792.00
27 November 2025	Conduct research re: adequate protection and priming liens.	G Zahiremami	4.30	4,257.00
28 November 2025	Internal team call re: standing motion replies (0.9); review/analyze Quinn Report / board presentation and research/internal communications re: same (3.0).	C West	3.90	6,981.00
28 November 2025	Call among W&C re: standing motion replies.	A Chase	0.90	1,422.00
28 November 2025	Review potential litigation papers in preparation for reply (0.6); research negative caselaw (0.7); develop counterarguments to bring on reply (1.2); correspond with A. Zatz, S. Greissman, C. West, A. Chase, and D. Litz re: same (0.1); call with A. Zatz, S. Greissman, C. West, A. Chase and D. Litz re: same (0.9).	V Sachdev	3.50	4,970.00
28 November 2025	Telephone conference with S. Greissman, A. Zatz, W&C team re: standing motion replies.	B Lingle	0.90	1,233.00
28 November 2025	Call with W&C team re: strategy for reply briefs.	D Litz	0.80	1,096.00
28 November 2025	Conduct research re: adequate protection and equity (3.4); prepare write up of same and email to A. Zatz (1.2); review and revise same re: lien reply (0.8).	G Zahiremami	5.40	5,346.00
29 November 2025	Further review/analysis of Quinn Report / board presentation (0.7); research and internal communications re: same (0.5).	C West	1.20	2,148.00
29 November 2025	Review Quinn production.	A Chase	0.60	948.00
30 November 2025	Call with C. West re: potential litigation.	A Zatz	0.30	630.00
30 November 2025	Call with A. Zatz re: standing motion issues (0.6); draft reply and research re: same (4.2).	C West	4.80	8,592.00
SUBTOTAL: Investigation of Causes of Action			**876.80**	**1,266,011.00**

Mediation

3 November 2025	Conferences with W&C and Alix teams re: confidential case settlement matters, valuation strategy, and tactics.	G Pesce	1.80	3,780.00
4 November 2025	Conference call with D. Rowe re: Committee/1L negotiation (0.4); team correspondence re: same (0.2); correspondence with G. Klidonas re: mediation proposal (0.2).	S Greissman	0.80	2,000.00
4 November 2025	Conferences with W&C and Alix teams re: confidential case settlement matters.	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
5 November 2025	Team catch up conference call with D. Rowe re: direct principal negotiations.	S Greissman	0.70	1,750.00
5 November 2025	Conferences with W&C and Alix teams re: strategy.	G Pesce	0.80	1,680.00
5 November 2025	Call with C. Shore re: settlement talks (0.2); related call with B. Lingle (0.2); call with Jupiter re: potential settlement (0.6).	A Zatz	1.00	2,100.00
6 November 2025	Draft settlement counter proposal.	S Greissman	0.50	1,250.00
6 November 2025	Confer with S. Greissman and C. Shore re: settlement negotiations.	J Zakia	0.80	1,760.00
6 November 2025	Telephone conference with S. Greissman re: negotiation research (0.1); research re: same (0.8).	B Lingle	0.90	1,233.00
7 November 2025	Pre-call with C. Shore re: Committee settlement and principals discussion (0.5); draft settlement counter proposals (0.5); correspondence with Paul Hastings re: counter proposal and related (0.5); Committee communications (0.5); review adversary complaint (1.4); review standing motion re: adversary (1.2).	S Greissman	4.60	11,500.00
7 November 2025	Call with Alix and W&C teams re: settlement issues.	J Shore	0.50	1,250.00
7 November 2025	Review, revise negotiation research.	B Lingle	0.40	548.00
11 November 2025	Conference call with Latham & Watkins re: settlement issues.	S Greissman	0.30	750.00
21 November 2025	Conference call with Latham & Watkins re: status, settlement constructs and related.	S Greissman	0.20	500.00
22 November 2025	Correspondence with K. Hansen re: settlement (0.2); review Alix Partners settlement analysis (0.3).	S Greissman	0.50	1,250.00
24 November 2025	Review/revise confirmation objection (2.5); conference call with C. Shore re: discovery dispute, confirmation objection and related (0.3); correspondence with C. Shore re: same (0.2); office conference with A. Zatz re: confirmation objection and legal research (0.8); conference call with R. Schrock re: settlement constructs (0.4); conference call with Alix Partners re: settlement values and progression (0.3).	S Greissman	4.50	11,250.00
30 November 2025	Correspondence with R. Schrock re: status/settlement and related (0.2); internal correspondence with G. Pesce and C. Shore re: same (0.1).	S Greissman	0.30	750.00
SUBTOTAL: Mediation			**19.40**	**45,031.00**

Professional Retention & Fees - W&C

1 November 2025	Emails with G. Pesce re: fee applications.	S Ludovici	0.10	111.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 November 2025	Review pro forma time entries for September monthly fee statement for privilege and confidentiality especially re: litigation.	J Yoo	0.90	1,233.00
3 November 2025	Draft September monthly fee statement (0.7); email draft monthly fee statement to W&C team (0.1); coordinate with W&C team re: revising September (0.4); Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.4).	S Ludovici	1.60	1,776.00
4 November 2025	Review and revise time entries for first monthly fee statement.	D Litz	3.30	4,521.00
4 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	1.90	2,109.00
5 November 2025	Review pro forma time entries for September monthly fee statement for privilege and confidentiality especially re: litigation.	J Yoo	0.40	548.00
5 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	2.10	2,331.00
6 November 2025	Review W&C fee statement.	C Koster	0.40	760.00
6 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (4.6); review pro forma time entries or expense entries for September monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.7).	S Ludovici	5.30	5,883.00
7 November 2025	Revise September monthly fee statement (0.2); emails with G. Pesce and A. Zatz re: same (0.3); revise September monthly fee statement (0.3).	S Ludovici	0.80	888.00
7 November 2025	Correspondence with S. Ludovici re: W&C first monthly fee statement filing (0.2); prepare and file fee statement (0.5); email service of same (0.3); coordinate mail service of same (0.2).	K Wick	1.20	588.00
11 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	0.50	555.00
12 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including	S Ludovici	0.10	111.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	privilege and confidentiality.			
13 November 2025	Review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	2.00	2,220.00
19 November 2025	Reviewing consenting creditor reservation of rights re: fee application.	A Zatz	0.40	840.00
19 November 2025	Review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (2.3); review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.1).	S Ludovici	2.40	2,664.00
19 November 2025	Correspondence with S. Ludovici re: expert reports.	K Wick	0.20	98.00
20 November 2025	Review and revise fee statement.	D Litz	1.10	1,507.00
20 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	1.60	1,776.00
21 November 2025	Review / revise fee statement.	D Litz	4.20	5,754.00
21 November 2025	Review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	0.20	222.00
23 November 2025	Review and revise W&C fee statement.	D Litz	1.50	2,055.00
24 November 2025	Review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.1); revise October fee statement (0.1).	S Ludovici	0.20	222.00
25 November 2025	Review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality.	S Ludovici	0.50	555.00
26 November 2025	Review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (1.3); draft monthly fee statement (0.4).	S Ludovici	1.70	1,887.00
28 November 2025	Correspondence re: W&C fee application.	A Zatz	0.20	420.00
30 November 2025	Email with W&C team re: November monthly fee	S Ludovici	0.80	888.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	statement (0.2); review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.6).			
SUBTOTAL: Professional Retention & Fees - W&C			**35.60**	**42,522.00**

Professional Retention & Fees - Other

3 November 2025	Revising Alix retention application.	A Zatz	0.10	210.00
3 November 2025	Confer with A. Zatz, Alix team and Court re: AlixPartners retention and file cert. of counsel for retention order.	D Litz	1.00	1,370.00
3 November 2025	Review AlixPartners supplemental declaration (0.1); send same for filing (0.1); emails with same re: same (0.1).	G Zahiremami	0.30	297.00
3 November 2025	Review and file supplemental declaration in support of AlixPartners retention application (0.1); electronically serve same (0.2).	D Hirshorn	0.30	147.00
3 November 2025	Prepare CNO for filings (0.2); correspondence with D. Litz re: same (0.3); file CNO (0.4); email service of same (0.5).	K Wick	1.40	686.00
4 November 2025	Review real estate retention applications.	B Lingle	0.90	1,233.00
4 November 2025	Coordinate mail service of CoC Filing.	K Wick	0.30	147.00
5 November 2025	File AlixPartners first monthly fee statement (0.5); email service (0.6); coordinate mail service (0.3).	K Wick	1.40	686.00
6 November 2025	Coordinate mail service of AlixPartners' First Monthly Fee Statement.	K Wick	0.20	98.00
10 November 2025	Correspond with J. Amico re: Cresa retention application.	B Lingle	0.30	411.00
11 November 2025	Correspond with J. Amico re: Cresa retention application.	B Lingle	0.20	274.00
SUBTOTAL: Professional Retention & Fees - Other			**6.40**	**5,559.00**

Reports, Schedules & US Trustee Issues

13 November 2025	Review letters to US Trustee.	C Koster	0.40	760.00
SUBTOTAL: Reports, Schedules & US Trustee Issues			**0.40**	**760.00**

Tax Issues

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 November 2025	Reviewed LLCA for tax issues.	S Gee	1.40	2,660.00
SUBTOTAL: Tax Issues			**1.40**	**2,660.00**
TOTAL			**3,309.00**	**4,604,307.00**

Exhibit D

Summary of Expenses by Category

Category	Amount
Airfare	$2,401.69
Business Meals	$72.65
Computer Services	$90.00
Conference Room Dining	$4,965.68
Courier Service	$96.92
Court Costs	$100.00
Deposition Transcripts	$80,692.91
Hotel Expense	$2,925.66
Overtime Meals	$253.48
Parking	$75.00
Taxi - Business	$1,511.90
Taxi - Overtime	$463.90
Travel Meals	$52.03
Grand Total	**$93,701.82**

Exhibit E

Detailed Statement of Expenses

Name	Date	English Narrative	Category	Amount
Shore, Christopher	11/3/2025	Hotel stay by Shore, Christopher at Four Seasons Hotel in Houston, Texas for 2 days, 1 night for Modivcare matter.	Hotel Expense	$700.00
Shore, Christopher	11/3/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from LGA to HOU for Shore, Christopher on 10/29/2025 for Flight from LGA for Modivcare matters.	Airfare	$324.18
Shore, Christopher	11/3/2025	One Way, Economy airfare/fee on United Airlines Inc. from HOU to FL for Shore, Christopher on 10/30/2025 for Flight from FL for Modivcare matters.	Airfare	$459.18
Shore, Christopher	11/3/2025	Taxi - Houston, TX 77002-3111, US/ Houston, TX 77002-3111, US - Ride to Airport - 30-Oct-2025	Taxi - Business	$60.76
Shore, Christopher	11/3/2025	Taxi - Lake Ave, Greenwich, CT 06831-2713, US/ Terminal C Express Dropoff, Checked-In, LaGuardia Airport (LGA), Queens, NY 11371, US - Ride to airport - 29-Oct-2025	Taxi - Business	$120.45
Shore, Christopher	11/3/2025	Taxi - Terminal A, George Bush Intercontinental Airport (IAH), Houston, TX 77032, US/ 1300 Lamar St, Houston, TX 77010, US - Ride to Hotel - 29-Oct-2025	Taxi - Business	$91.97
Shore, Christopher	11/3/2025	Ticketing Fee for airfare on Delta Airlines Inc. from LGA to HOU for Shore, Christopher on 10/29/2025	Airfare	$50.00
Shore, Christopher	11/3/2025	Ticketing Fee for airfare on United Airlines Inc. from HOU to FL for Shore, Christopher on 10/30/2025	Airfare	$50.00
Greissman, Scott	11/4/2025	106 pages COPIED - DATE OF HEARING: OCTOBER 30, 2025 - IN RE: MODIVCARE, INC. AND VRI INTERMEDIATE HOLDINGS, LLC / MOTION HEARING TRANSCRIPT; CASE NUMBER/JUDGE: 25-90309-11 / JUDGE ALFREDO R. PEREZ	Deposition Transcripts	$143.10
Pesce, Gregory	11/7/2025	CAR SERVICE INVOICE#103235521-10/17/2025-Gregory Pesce- RESV RECEIPT ID11157632-60638	Taxi - Business	$207.59
Pesce, Gregory	11/7/2025	CAR SERVICE INVOICE#103235521-10/21/2025-Gregory Pesce- RESV RECEIPT ID11157631-60615 O'Hare International Airport 60666 39	Taxi - Business	$235.32
Pesce, Gregory	11/7/2025	CAR SERVICE INVOICE#103235521-10/21/2025-Gregory Pesce- RESV RECEIPT ID11157630-11371	Taxi - Business	$152.92
Isaac, Chantal	11/10/2025	GRUBHUB INVOICE#SL-227-287-ORDER#999431507453221-DELIVERY 2025-10-29 20:24:00 EDT sweetgreen to 1221 Avenue of the Americas Chantal Isaac-	Overtime Meals	$36.56
Shore, Christopher	11/11/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 11/6/2025 for Beverages - Approximate headcount :10	Conference Room Dining	$75.67
Shore, Christopher	11/11/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 11/6/2025 for Beverages - Approximate headcount :10	Conference Room Dining	$75.67
Shore, Christopher	11/11/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45971 for Beverages and Sandwiches - Approximate headcount :10	Conference Room Dining	$293.96
Shore, Christopher	11/11/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 11/5/2025 for Snacks - Approximate headcount :10	Conference Room Dining	$65.11
Greissman, Scott	11/11/2025	Veritext, LLC. Invoice Date: 07 November 2025. Transcript Services - Original Transcript(s) | Witness: Scott A. Kern | Job #: 7732627 | Job Date: 11/6/2025	Deposition Transcripts	$4,967.40
Greissman, Scott	11/11/2025	Veritext, LLC. Invoice Date: 07 November 2025. Transcript Services - Original Transcript(s) | Witness: Barbara Gutierrez | Job #: 7732620 | Job Date: 11/5/2025	Deposition Transcripts	$6,184.17

Name	Date	English Narrative	Category	Amount
Zatz, Andrew	11/12/2025	Overtime Meals US - Andrew Zatz - OT dinner at office. - 10-Nov-25	Overtime Meals	$45.10
Zatz, Andrew	11/12/2025	Overtime Transportation US - Uber home from office - 11-Nov-25	Taxi - Overtime	$139.59
Kakani, Bhavini	11/13/2025	GRUBHUB INVOICE#SL-227-288-ORDER#202231584298883-DELIVERY 2025-11-05 20:48:00 EST Chick-fil-A to 1221 Avenue of the Americas Bhavini Kakani-	Overtime Meals	$36.58
Isaac, Chantal	11/13/2025	GRUBHUB INVOICE#SL-227-288-ORDER#211231580879239-DELIVERY 2025-11-05 20:23:00 EST Chirping Chicken to 1221 Avenue of the Americas Chantal Isaac-	Overtime Meals	$36.53
Zatz, Andrew	11/13/2025	Overtime Transportation US - OT uber home from office. - 12-Nov-25	Taxi - Overtime	$148.95
Isaac, Chantal	11/14/2025	Taxi - Office/Home - Worked late; took an Uber home. - 05-Nov-2025	Taxi - Overtime	$18.98
Zakia, Jason	11/17/2025	Car Service - airport to office - Attend deposition of H. Sampson. - 10-Nov-2025	Taxi - Business	$111.02
Zakia, Jason	11/17/2025	Car Service - home to airport - Attend deposition of H. Sampson. - 10-Nov-2025	Taxi - Business	$142.90
Zakia, Jason	11/17/2025	Car Service - Office to airport - Attend expert prep meeting - 13-Nov-2025	Taxi - Business	$66.82
Zakia, Jason	11/17/2025	Car Service - ORD to home - Attend expert prep meeting - 13-Nov-2025	Taxi - Business	$133.43
Shore, Christopher	11/17/2025	Catering services for ModivCare Deposition in Chicago provided by FLIK on 45971 for Continental Breakfast, Sandwiches, Afternoon Break and Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Shore, Christopher	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45971 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Shore, Christopher	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45971 for Sandwiches and Beverages - Approximate headcount :10	Conference Room Dining	$519.33
Zakia, Jason	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45972 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Zakia, Jason	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45972 for Sandwiches and Beverages - Approximate headcount :10	Conference Room Dining	$479.05
Zakia, Jason	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45972 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
West, Colin	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45974 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
West, Colin	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45974 for Sandwiches and Beverages - Approximate headcount :10	Conference Room Dining	$617.32
West, Colin	11/17/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45974 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Zakia, Jason	11/17/2025	Hotel stay by Zakia, Jason at The Time Square Edition in New York, NY for 2 days, 1 nights for Modivcare matter.	Hotel Expense	$485.44
Zakia, Jason	11/17/2025	Hotel stay by Zakia, Jason at W Hotels in Boston, MA for 2 days, 1 nights for Modivcare matter	Hotel Expense	$661.44
Zakia, Jason	11/17/2025	One Way, Economy airfare/fee on American Airlines from BOS to ORD for Zakia, Jason on 11/13/2025 for Attend expert prep meeting.	Airfare	$304.49
Zakia, Jason	11/17/2025	One Way, Economy airfare/fee on American Airlines from ORD to BOS for Zakia, Jason on 11/10/2025 for Attend deposition of H. Sampson.	Airfare	$301.49
Greissman, Scott	11/18/2025	Veritext, LLC. Invoice Date: 14 November 2025. Video - Initial Services | Witness: Barbara Gutierrez | Job #: 7732620 | Job Date: 11/5/2025	Deposition Transcripts	$1,400.00
Greissman, Scott	11/19/2025	A. Palomo - PHV for Ashley Chase	Court Costs	$100.00
Bourgault, Jacob	11/19/2025	Dinner - Dinner at Houston Airport: - 09-Nov-2025 - Internal Guest J.Bourgault - Dinner at Houston Airport: - 09-Nov-2025	Business Meals	$22.14

Name	Date	English Narrative	Category	Amount
Bourgault, Jacob	11/19/2025	Dinner - Dinner at NYC Airport. - 11-Nov-2025 - Internal Guest J.Bourgault - Dinner at NYC Airport. - 11-Nov-2025	Business Meals	$50.51
Bourgault, Jacob	11/19/2025	Hotel stay by Bourgault, Jacob at Hard Rock Hotel in New York, New York for 3 days, 2 nights for Modivcare matter.	Hotel Expense	$1,078.78
Bourgault, Jacob	11/19/2025	Lunch - Monday Night Uber Eats Dinner. - 10-Nov-2025 - Internal Guest J.Bourgault - Monday Night Uber Eats Dinner. - 10-Nov-2025	Travel Meals	$52.03
Bourgault, Jacob	11/19/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from HOU to NYC for Bourgault, Jacob on 11/11/2025 for Flight to NYC for Modivcare matters.	Airfare	$477.18
Bourgault, Jacob	11/19/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from NYC to HOU for Bourgault, Jacob on 11/07/2025 for Flight to HOU for Modivcare matters.	Airfare	$335.17
Bourgault, Jacob	11/19/2025	Parking - IAH Parking Ticket. - 14-Nov-2025	Parking	$75.00
Bourgault, Jacob	11/19/2025	Taxi - Lyft Ride - Lyft to NYC Hotel. - 09-Nov-2025	Taxi - Business	$79.10
Bourgault, Jacob	11/19/2025	Taxi - TO NYC - Uber to NYC Airport. - 11-Nov-2025	Taxi - Business	$109.62
Bourgault, Jacob	11/19/2025	Ticketing Fee for airfare on Delta Airlines Inc. from HOU to NYC for Bourgault, Jacob on 11/11/2025	Airfare	$50.00
Bourgault, Jacob	11/19/2025	Ticketing Fee for airfare on Delta Airlines Inc. from NYC to HOU for Bourgault, Jacob on 11/07/2025.	Airfare	$50.00
Greissman, Scott	11/20/2025	Catering services for ModivCare Deposition in Houston provided by ezCater, Inc. on 9/30/2025 for Snacks - Approximate headcount: 9	Conference Room Dining	$302.26
Greissman, Scott	11/20/2025	Catering services for ModivCare Deposition in Houston provided by Pappas Delivery on 9/30/2025 for Sandwiches - Approximate headcount: 10	Conference Room Dining	$183.49
Isaac, Chantal	11/20/2025	GRUBHUB INVOICE#SL-227-289-ORDER#183631631392398-DELIVERY 2025-11-10 20:10:00 EST DIG INN - Theater District to 1221 Avenue of the Americas Chantal Isaac-	Overtime Meals	$36.53
Isaac, Chantal	11/20/2025	GRUBHUB INVOICE#SL-227-289-ORDER#488131663085247-DELIVERY 2025-11-13 20:49:57 EST Haku Chinese to 1221 Avenue of the Americas Chantal Isaac-	Overtime Meals	$36.58
Greissman, Scott	11/20/2025	Veritext, LLC. Invoice Date: 18 November 2025. Transcript Services - Original Transcript(s) | Witness: Kevin Glodowski | Job #: 7753481 | Job Date: 11/17/2025	Deposition Transcripts	$7,506.80
Greissman, Scott	11/20/2025	Veritext, LLC. Invoice Date: 18 November 2025. Transcript Services - Original Transcript(s) | Witness: Daniel B. Silvers | Job #: 7753481 | Job #: 7742224 | Job Date: 11/13/2025	Deposition Transcripts	$10,468.99
Greissman, Scott	11/20/2025	Veritext, LLC. Invoice Date: 19 November 2025. Video - Initial Services | Witness: Heath Sampson | Job #: 7742202 | Job Date: 11/11/2025	Deposition Transcripts	$945.00
Greissman, Scott	11/22/2025	Judicial Transcribers Of Texas, LLC. Invoice Date: 13 November 2025. Hearing transcript requested by Loredana Miranda	Deposition Transcripts	$32.40
Greissman, Scott	11/22/2025	Veritext, LLC. Invoice Date: 20 November 2025. Transcript Services - Original Transcript(s) | Witness: Chad Shandlern | Job #: 7757416 | Job Date: 11/19/2025	Deposition Transcripts	$8,400.90
Shore, Christopher	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45981 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Shore, Christopher	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45981 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Shore, Christopher	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45981 for Sandwiches and Beverages - Approximate headcount :10	Conference Room Dining	$617.32
Zakia, Jason	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45980 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16

Name	Date	English Narrative	Category	Amount
Zakia, Jason	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45980 for Beverages - Approximate headcount :10	Conference Room Dining	$100.16
Zakia, Jason	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45980 for Sandwiches and Beverages - Approximate headcount :10	Conference Room Dining	$617.32
Zakia, Jason	11/24/2025	Catering services for ModivCare Deposition in New York provided by FLIK on 45981 for Sandwiches and Beverages - Approximate headcount :4	Conference Room Dining	$117.58
Greissman, Scott	11/25/2025	Veritext, LLC. Invoice Date: 20 November 2025. Video - Initial Services | Witness: Kenneth Shepard | Job #: 7742149 | Job Date: 11/10/2025	Deposition Transcripts	$1,800.00
Sachdev, Varoon	11/26/2025	Internet - AA inflight internet service for work during travel. - 31-Oct-2025	Computer Services	$24.00
Sachdev, Varoon	11/26/2025	Internet - AA inflight internet service for work during travel. - 30-Oct-2025	Computer Services	$24.00
Sachdev, Varoon	11/26/2025	Internet - Wi-Fi on airplane to continue work on ModivCare matter - 05-Nov-2025	Computer Services	$18.00
Sachdev, Varoon	11/26/2025	Internet – Wi-Fi on airplane to continue work on ModivCare matter - 06-Nov-2025	Computer Services	$24.00
Zatz, Andrew	11/26/2025	Overtime Meals US - Andrew Zatz - OT dinner working on client matter - 24-Nov-25	Overtime Meals	$25.60
Zatz, Andrew	11/26/2025	Overtime Transportation US - Uber ride home from office - 25-Nov-25	Taxi - Overtime	$156.38
Greissman, Scott	11/26/2025	Witness: Marc Brown - Job #: 7746593 | Job Date: 11/21/2025 - Case: Modivcare Inc., Et Al. v. (2590309)	Deposition Transcripts	$5,901.98
Greissman, Scott	11/27/2025	Veritext, LLC. Invoice Date: 26 November 2025. Video - Initial Services | Modivcare Inc., Et Al. v. (2590309(ARP))	Deposition Transcripts	$1,240.00
Greissman, Scott	11/28/2025	Veritext, LLC. Invoice Date: 20 November 2025. Transcript Services - Original Transcript(s) | Witness: Leslie Norwalk | Job #: 7753538 | Job Date: 11/17/2025	Deposition Transcripts	$6,253.80
Greissman, Scott	11/28/2025	Veritext, LLC. Invoice Date: 20 November 2025. Transcript Services - Original Transcript(s) | Witness: David Mounts Gonzales | Job #: 7742252 | Job Date: 11/14/2025	Deposition Transcripts	$8,048.71
Greissman, Scott	11/28/2025	Veritext, LLC. Invoice Date: 24 November 2025. Transcript Services - Original Transcript(s) | Witness: Heath Sampson | Job #: 7742202 | Job Date: 11/11/2025	Deposition Transcripts	$5,023.46
Greissman, Scott	11/28/2025	Veritext, LLC. Invoice Date: 24 November 2025. Transcript Services - Original Transcript(s) | Witness: Zul Jamal | Job #: 7757482 | Job Date: 11/20/2025	Deposition Transcripts	$12,376.20
Greissman, Scott	11/30/2025	US Messenger & Logistics Inc.. Invoice Date: 30 November 2025. Messenger Services | 11172025 | From White & Case LLP 111 S Wacker Dr Suite 5100 Chicago, IL 60606-4302 to Residence	Courier Service	$96.92

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

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

WHITE & CASE LLP'S FIRST INTERIM APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 TO AND INCLUDING NOVEMBER 30, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in the Cases:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	October 31, 2025 [Docket No. 616]	
Interim Application (X) No.: First	**Beginning of Period**	**End of Period**
Time period covered by this Application for which interim compensation has not previously been awarded:	September 9, 2025	November 30, 2025
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?		Yes
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?		Yes
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases?		Yes
Do expense reimbursements represent actual and necessary expenses incurred?		Yes

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

Compensation Breakdown for Time Period Covered by This Application	
Total professional[2] fees requested in this Application:	$10,599,449.00
Total professional hours covered by this Application:	7,278.0
Average hourly rate[3] for professionals:	$1,456
Total paraprofessional[4] fees requested in this Application:	$179,522.00
Total actual paraprofessional hours covered by this Application:	355.6
Average hourly rate for paraprofessionals:	$505
Total fees requested in this Application:	$10,778,971.00
Total expense reimbursements requested in this Application:	$146,980.24
Total fees and expenses requested in this Application:	$10,925,951.24
Total fees and expenses awarded in all prior Applications:	N/A

Plan Status: On September 4, 2025, the Debtors filed the *Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 119] and on October 6, 2025 filed the solicitation version of the *First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 465] (the "**Plan**"). The Plan contemplates an equitization of the Debtors' prepetition secured lenders' claims. The Plan contemplates a de minimis recovery for certain unsecured creditors through the distribution of reorganized equity for certain unsecured creditors or a cash distribution for others. Further, holders of unsecured notes receive no recovery under the Plan. A hearing to consideration confirmation of the Plan began on December 8, 2025.

Primary Benefits: From the date of its selection by the Committee through the date of this Application, White & Case has served as the Committee's general bankruptcy counsel in all aspects of the chapter 11 cases. During the period of time covered by this Application, White & Case provided numerous benefits to the Committee and its constituency, including but not limited to:

(i) preparing an objection to the Debtors' DIP financing motion, resulting in material changes to the DIP financing order in favor of unsecured creditors,

(ii) objecting to approval of the disclosure statement with respect to ModivCare Debtors' plan of reorganization,

(iii) objecting to confirmation of the ModivCare Debtors' plan of reorganization,

(iv) investigating the prepetition liability management exercise and causes of action related thereto, resulting in a standing motion and complaint, and reply brief in support, setting for causes of action against the ModivCare Debtors and certain prepetition lenders

(v) investigating secured lenders' liens on certain of the Debtors' assets earned pre- and post- petition resulting in a claim objection and standing motion and complaint setting forth objections and causes of action against certain prepetition lenders that, if successful, would result in significant value being declared unencumbered for the benefit of unsecured creditors,

(vi) engaging in extensive discovery related to the DIP, Plan, and the two standing motions and proposed complaints, including reviewing over 30,000 documents, multiple depositions and Company interviews, meet and confer conferences, litigating

[2] Includes staff attorneys.

[3] Average hourly rates in this Application are calculated by dividing total fees by total hours covered by this Application, rounded to the nearest whole dollar.

[4] May include individuals admitted to the bar.

discovery disputes, and preparing for and participating in status conferences before the court, and

(vii) holding several meetings with Committee members and advisors to discuss open issues and next steps in support of improving unsecured creditor recoveries.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* ("Compensation Procedures Order") [Docket No. 500], each party receiving notice of an interim fee application will have until 21 days after service of the interim fee application to object to the requested fees and expenses. Upon the expiration of such 21-day period, the Court, in its discretion, may approve an interim fee application without the need for a hearing if no objections are filed.

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") of the above-captioned debtors and debtors in possession (the "Debtors"), hereby files this first interim fee application (this "Interim Fee Application") for the period from September 9, 2025 to and including November 30, 2025 (the "Interim Period")[5] requesting interim allowance and payment of a total award of $10,925,951.24 for the Interim Period comprised of (a) compensation for professional services to the Committee in the amount of $10,778,971.00 for fees earned by White & Case for professional services to the Committee during the Interim Period,[6] and (b) reimbursement of the actual and necessary expenses in the amount of $146,980.24 incurred by White & Case during the Interim Period in connection with such services.[7] A proposed order in the form located on the Court's website is attached hereto.

1. In support of this Interim Fee Application, White & Case submits the following:

[5] Pursuant to the Compensation Procedures Order, the first Interim Fee Application should cover the Interim Period through and including November 30, 2025.

[6] This amount reflects a voluntary reduction of $198,739.00 (~1.8%) for the Interim Period.

[7] This amount reflects a voluntary reduction of $3,244.64 (~2.2%) for the Interim Period.

a. A summary of White & Case's hours expended and fees earned during the Interim Period grouped by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**.

b. A summary of White & Case's hours expended and fees earned during the Interim Period grouped by project category is attached hereto as **Exhibit B.**

c. A summary of White & Case's hours expended and fees earned during the Interim Period grouped by project category and timekeeper is attached hereto as **Exhibit C**.

d. Detailed statements of White & Case's hours expended and fees earned during the Interim Period are attached to White & Case's monthly fee statements, filed at Docket Nos. 684, 882, 957.

e. A summary of White & Case's out-of-pocket expenses incurred during the Interim Period is attached hereto as **Exhibit D**.

f. Detailed statements of White & Case's out-of-pocket expenses incurred during the Interim Period are attached to White & Case's monthly fee statements, filed at Docket Nos. 684, 882, 957.

2. White & Case attorneys and paraprofessionals expended a total of 7,633.6 hours in connection with these Chapter 11 Cases during the Interim Period. All services rendered by White & Case for which compensation is sought pursuant to this Interim Fee Application were rendered solely to or on behalf of the Committee. No payments were received by White & Case from any source other than the Debtors for services rendered or to be rendered in connection with these Chapter 11 Cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Interim Fee Application must do so within twenty-one (21) days. The Court, in its discretion, may approve an Interim Fee Application without the need for a hearing if no objections are filed. The Debtors shall be authorized to pay promptly such Professionals all requested fees (including the 20% fee holdback) and expenses not paid previously upon the Court allowing such Professional's Interim Fee Application.

4. Although White & Case has made every effort to include all fees earned and expenses incurred during the Interim Period, some fees and expenses might not be included in this Interim Fee Application due to delays caused by accounting and processing during the Interim Period. White & Case reserves the right to make further statements to this Court for allowance of such fees and expenses not included herein. Subsequent fee statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

WHEREFORE, White & Case requests (a) interim allowance and payment of compensation for professional services to the Committee in the amount of $10,778,971.00 for fees earned by White & Case for professional services to the Committee during the Interim Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Interim Period in connection with such services in the amount of $146,980.24, for a total award of $10,925,951.24 for the Interim Period.

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December 9, 2025
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

Certificate of Service

I certify that on December 9, 2025, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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

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

ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES
(Docket No. ____)

The Court has considered the first interim application for compensation and reimbursement of expenses filed by White & Case LLP (the "Applicant"). The Court orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of $10,925,951.24 for the period set forth in the application.

2. The Debtors are authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order.

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

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

Exhibit A

Summary of Total Fees and Hours by Timekeeper for Interim Period

Name	Title	Year Admitted	Areas of Expertise	Hours	Rate	Fees
Abouhashish, Salma	**Associate**	N/A	Pool Associates - Corporate	12.1	$870.00	$10,527.00
Ahmed, Heidi	**Associate**	2024	Capital Markets Practice	6.0	$990.00	$5,940.00
Aquije, Alonso	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	151.3	$1,110.00	$167,943.00
Bagdasarian, Amy	**Associate**	2003	Debt Finance Practice	13.9	$1,580.00	$21,962.00
Beil, Ryan	**Associate**	2021	Financial Restructuring & Insolvency (FRI) Practice	345.1	$1,280.00	$441,728.00
Binuya, Sebastian Angelo	**Litigation Specialist**	N/A	Practice Technology - Disputes	0.5	$420.00	$210.00
Bourgault, Jacob	**Associate**	2025	Pool Associates - Corporate	475.1	$870.00	$413,337.00
Chase, Ashley	**Associate**	2016	Financial Restructuring & Insolvency (FRI) Practice	541.6	$1,580.00	$855,728.00
Chemborisov, Gleb	**Litigation Specialist**	N/A	Timekeeper Pool	66.8	$490.00	$32,732.00
Chen, Ken	**Project Manager - Litigation Support**	N/A	Practice Technology - Disputes	77.6	$490.00	$38,024.00
Chen, Tony	**Manager of Litigation Support**	N/A	Timekeeper Pool	3.2	$490.00	$1,568.00
Chitwan, Charu	**Associate**	2014	Financial Restructuring & Insolvency (FRI) Practice	178.5	$1,110.00	$198,135.00
Dreier, David	**Partner**	1995	Tax Practice	0.8	$2,350.00	$1,880.00
Ericksen, A.J.	**Partner**	2005	Securities Practice	10.6	$2,200.00	$23,320.00
Feld, Elizabeth	**Partner**	2001	Financial Restructuring & Insolvency (FRI) Practice	3.4	$1,790.00	$6,086.00
Galvan, Paolo	**Project Manager - Litigation Support**	N/A	Practice Technology - Disputes	0.5	$420.00	$210.00
Gee, Steven	**Partner**	2009	Tax Practice	1.4	$1,900.00	$2,660.00
Gorsich, Ronald	**Partner**	2001	Financial Restructuring & Insolvency (FRI) Practice	2.5	$1,900.00	$4,750.00
Graham, Richard	**Counsel**	2003	Financial Restructuring & Insolvency (FRI) Practice	1.1	$1,630.00	$1,793.00
Greissman, Scott	**Partner**	1995	Financial Restructuring & Insolvency (FRI) Practice	335.7	$2,500.00	$839,250.00
Hirshorn, Deanna	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	16.6	$490.00	$8,134.00
Hong, Alice	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	352.8	$1,370.00	$483,336.00
Isaac, Chantal	**Associate**	N/A	Pool Associates - Corporate	177.8	$870.00	$154,686.00
Kakani, Bhavini	**Associate**	2025	Litigation Practice	191.4	$870.00	$166,518.00
Kates, Paula	**Associate**	2020	Litigation Practice	7.4	$1,370.00	$10,138.00
Koster, Charles	**Partner**	2009	Financial Restructuring & Insolvency (FRI) Practice	60.6	$1,900.00	$115,140.00
Lingle, Barrett	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	132.4	$1,370.00	$181,388.00
Litz, Dominic	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	278.1	$1,370.00	$380,997.00
Ludovici, Stephen	**Staff Attorney**	2014	Financial Restructuring & Insolvency (FRI) Practice	51.1	$1,110.00	$56,721.00
Lupinacci, Frank	**Partner**	2008	M&A - Private Equity Practice	14.6	$1,900.00	$27,740.00
Magnaye, Maclin	**Litigation Specialist**	N/A	Practice Technology - Disputes	1.0	$420.00	$420.00
Mago, Don	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	280.1	$990.00	$277,299.00
McNary, Mary Jane	**Legal Assistant**	N/A	Litigation Practice	1.2	$420.00	$504.00

Miranda, Loredana	**Associate**	2022	Financial Restructuring & Insolvency (FRI) Practice	662.2	$1,220.00	$807,884.00
Morales, Jon	**Project Manager - Litigation Support**	N/A	Practice Technology - Disputes	0.5	$490.00	$245.00
Pesce, Gregory	**Partner**	2011	Financial Restructuring & Insolvency (FRI) Practice	191.8	$2,100.00	$402,780.00
Quintana, Anastasia	**Associate**	N/A	Pool Associates - Litigation	160.7	$870.00	$139,809.00
Rai, Parm	**Associate**	2024	Debt Finance Practice	23.8	$1,110.00	$26,418.00
Sachdev, Varoon	**Associate**	2018	Financial Restructuring & Insolvency (FRI) Practice	204.8	$1,420.00	$290,816.00
Shore, Christopher	**Partner**	1992	Financial Restructuring & Insolvency (FRI) Practice	418.0	$2,500.00	$1,045,000.00
Silnicki, Graham	**Associate**	2013	Debt Finance Practice	19.2	$1,470.00	$28,224.00
Slattery, Christine	**Legal Assistant**	N/A	Debt Finance Practice	26.2	$700.00	$18,340.00
Smith, Erin	**Counsel**	2014	Financial Restructuring & Insolvency (FRI) Practice	447.1	$1,630.00	$728,773.00
Venes, Aileen	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	24.5	$490.00	$12,005.00
Walz, Jacko	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	394.4	$870.00	$343,128.00
West, Colin	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	190.1	$1,790.00	$340,279.00
Wick, Katie	**Legal Assistant**	N/A	Financial Restructuring & Insolvency (FRI) Practice	137.0	$490.00	$67,130.00
Yoo, Jade	**Associate**	2020	Financial Restructuring & Insolvency (FRI) Practice	100.0	$1,370.00	$137,000.00
Zahiremami, Golshid	**Associate**	2025	Financial Restructuring & Insolvency (FRI) Practice	297.4	$990.00	$294,426.00
Zakia, Jason	**Partner**	1999	Financial Restructuring & Insolvency (FRI) Practice	254.0	$2,200.00	$558,800.00
Zatz, Andrew	**Partner**	2008	Financial Restructuring & Insolvency (FRI) Practice	289.1	$2,100.00	$607,110.00
Grand Total				**7,633.6**		**$10,778,971.00**

Exhibit B

Summary of Total Fees and Hours by Project Category for Interim Period

Cat. No.	Project Category Description	Total Hours	Total Fees
B03	Automatic Stay Issues	4.5	$8,161.00
B04	Case Administration	139.9	$123,591.00
B05	Case Strategy	234.8	$443,253.00
B06	Cash Management & Intercompany Issues	23.2	$40,763.00
B07	Claims Administration & Objections	32.7	$39,406.00
B08	Committee Meetings & Communications	199.9	$349,195.00
B09	Corporate, Securities & Regulatory Issues	6.0	$13,440.00
B10	Creditor Communications	11.7	$19,821.00
B11	DIP Financing & Cash Collateral	503.1	$828,944.00
B12	Discovery	3,259.8	$4,219,387.00
B13	Exclusivity, Plan & Disclosure Statement	851.4	$1,291,880.00
B14	Executory Contracts & Unexpired Leases	8.3	$8,328.00
B15	Hearings & Court Matters	232.8	$413,506.00
B16	Investigation of Causes of Action	1,645.0	$2,283,852.00
B17	Lien Challenge	121.0	$139,526.00
B18	Mediation	186.8	$353,426.00
B19	Non-Working Travel	4.6	$8,556.00
B20	Professional Retention & Fees - W&C	133.2	$146,295.00
B21	Professional Retention & Fees - Other	26.8	$33,108.00
B22	Reports, Schedules & US Trustee Issues	5.7	$9,573.00
B23	Tax Issues	2.4	$4,960.00
Grand Total		**7,633.6**	**$10,778,971.00**

Exhibit C

Summary of Total Fees and Hours by Project Category & Timekeeper for Interim Period

No.	Project Category	Name	Hours	Fees
B03	**Automatic Stay Issues**	Gorsich, Ronald	2.5	$4,750.00
		Litz, Dominic	1.3	$1,781.00
		Shore, Christopher	0.4	$1,000.00
		Zatz, Andrew	0.3	$630.00
B03 Total			**4.5**	**$8,161.00**
B04	**Case Administration**	Beil, Ryan	1.5	$1,920.00
		Chitwan, Charu	0.4	$444.00
		Greissman, Scott	0.6	$1,500.00
		Hirshorn, Deanna	7.5	$3,675.00
		Hong, Alice	2.5	$3,425.00
		Isaac, Chantal	0.6	$522.00
		Koster, Charles	0.5	$950.00
		Lingle, Barrett	2.8	$3,836.00
		Litz, Dominic	6.1	$8,357.00
		Mago, Don	38.6	$38,214.00
		Miranda, Loredana	8.1	$9,882.00
		Sachdev, Varoon	5.5	$7,810.00
		Smith, Erin	4.2	$6,846.00
		Venes, Aileen	8.6	$4,214.00
		Walz, Jacko	4.0	$3,480.00
		Wick, Katie	38.8	$19,012.00
		Zahiremami, Golshid	9.6	$9,504.00
B04 Total			**139.9**	**$123,591.00**
B05	**Case Strategy**	Beil, Ryan	6.0	$7,680.00
		Bourgault, Jacob	1.3	$1,131.00
		Chase, Ashley	5.7	$9,006.00
		Chemborisov, Gleb	0.5	$245.00
		Greissman, Scott	16.6	$41,500.00
		Hong, Alice	2.3	$3,151.00
		Isaac, Chantal	1.3	$1,131.00
		Koster, Charles	2.6	$4,940.00
		Lingle, Barrett	7.1	$9,727.00
		Litz, Dominic	16.5	$22,605.00
		Mago, Don	15.0	$14,850.00
		Miranda, Loredana	6.8	$8,296.00
		Pesce, Gregory	65.5	$137,550.00
		Quintana, Anastasia	4.3	$3,741.00
		Sachdev, Varoon	8.6	$12,212.00
		Shore, Christopher	31.7	$79,250.00
		Walz, Jacko	1.2	$1,044.00
		Yoo, Jade	2.9	$3,973.00
		Zahiremami, Golshid	0.9	$891.00
		Zakia, Jason	5.3	$11,660.00
		Zatz, Andrew	32.7	$68,670.00
B05 Total			**234.8**	**$443,253.00**
B06	**Cash Management & Intercompany Issues**	Beil, Ryan	2.8	$3,584.00
		Greissman, Scott	4.4	$11,000.00
		Lingle, Barrett	1.5	$2,055.00
		Litz, Dominic	0.2	$274.00
		Mago, Don	5.6	$5,544.00
		Shore, Christopher	1.2	$3,000.00
		Zahiremami, Golshid	0.4	$396.00
		Zatz, Andrew	7.1	$14,910.00
B06 Total			**23.2**	**$40,763.00**
B07	**Claims Administration & Objections**	Graham, Richard	1.1	$1,793.00
		Greissman, Scott	0.1	$250.00
		Lingle, Barrett	0.7	$959.00
		Litz, Dominic	1.0	$1,370.00
		Mago, Don	16.1	$15,939.00
		Sachdev, Varoon	6.5	$9,230.00

		Shore, Christopher	0.7	$1,750.00
		Walz, Jacko	4.5	$3,915.00
		Zatz, Andrew	2.0	$4,200.00
B07 Total			**32.7**	**$39,406.00**
B08	**Committee Meetings & Communications**	Beil, Ryan	1.6	$2,048.00
		Chase, Ashley	10.8	$17,064.00
		Greissman, Scott	24.8	$62,000.00
		Hong, Alice	4.1	$5,617.00
		Koster, Charles	3.6	$6,840.00
		Lingle, Barrett	6.3	$8,631.00
		Litz, Dominic	28.5	$39,045.00
		Mago, Don	23.5	$23,265.00
		Miranda, Loredana	11.5	$14,030.00
		Pesce, Gregory	9.2	$19,320.00
		Sachdev, Varoon	6.1	$8,662.00
		Shore, Christopher	25.4	$63,500.00
		Smith, Erin	11.2	$18,256.00
		West, Colin	2.3	$4,117.00
		Wick, Katie	0.6	$294.00
		Yoo, Jade	2.3	$3,151.00
		Zahiremami, Golshid	5.5	$5,445.00
		Zakia, Jason	4.5	$9,900.00
		Zatz, Andrew	18.1	$38,010.00
B08 Total			**199.9**	**$349,195.00**
B09	**Corporate, Securities & Regulatory Issues**	Ericksen, A.J.	5.2	$11,440.00
		Greissman, Scott	0.8	$2,000.00
B09 Total			**6.0**	**$13,440.00**
B10	**Creditor Communications**	Beil, Ryan	7.2	$9,216.00
		Greissman, Scott	3.8	$9,500.00
		Litz, Dominic	0.5	$685.00
		Zatz, Andrew	0.2	$420.00
B10 Total			**11.7**	**$19,821.00**
B11	**DIP Financing & Cash Collateral**	Aquije, Alonso	6.7	$7,437.00
		Beil, Ryan	42.5	$54,400.00
		Chase, Ashley	14.3	$22,594.00
		Greissman, Scott	46.8	$117,000.00
		Isaac, Chantal	4.3	$3,741.00
		Koster, Charles	12.3	$23,370.00
		Lingle, Barrett	33.9	$46,443.00
		Litz, Dominic	35.7	$48,909.00
		Mago, Don	30.7	$30,393.00
		Miranda, Loredana	67.7	$82,594.00
		Pesce, Gregory	48.5	$101,850.00
		Sachdev, Varoon	2.3	$3,266.00
		Shore, Christopher	26.1	$65,250.00
		Smith, Erin	9.3	$15,159.00
		Yoo, Jade	0.3	$411.00
		Zahiremami, Golshid	47.3	$46,827.00
		Zakia, Jason	30.6	$67,320.00
		Zatz, Andrew	43.8	$91,980.00
B11 Total			**503.1**	**$828,944.00**
B12	**Discovery**	Aquije, Alonso	140.2	$155,622.00
		Beil, Ryan	0.5	$640.00
		Binuya, Sebastian Angelo	0.5	$210.00
		Bourgault, Jacob	371.2	$322,944.00
		Chase, Ashley	262.7	$415,066.00
		Chemborisov, Gleb	66.3	$32,487.00
		Chen, Ken	77.6	$38,024.00
		Chen, Tony	3.2	$1,568.00
		Chitwan, Charu	148.0	$164,280.00
		Galvan, Paolo	0.5	$210.00
		Greissman, Scott	94.8	$237,000.00
		Hong, Alice	171.3	$234,681.00
		Isaac, Chantal	165.6	$144,072.00
		Kakani, Bhavini	159.4	$138,678.00
		Kates, Paula	7.4	$10,138.00

		Koster, Charles	8.1	$15,390.00
		Litz, Dominic	0.7	$959.00
		Magnaye, Maclin	1.0	$420.00
		Mago, Don	0.1	$99.00
		McNary, Mary Jane	1.2	$504.00
		Miranda, Loredana	277.3	$338,306.00
		Morales, Jon	0.5	$245.00
		Pesce, Gregory	9.2	$19,320.00
		Quintana, Anastasia	156.1	$135,807.00
		Sachdev, Varoon	2.2	$3,124.00
		Shore, Christopher	189.4	$473,500.00
		Smith, Erin	380.0	$619,400.00
		Venes, Aileen	0.7	$343.00
		Walz, Jacko	282.6	$245,862.00
		West, Colin	14.6	$26,134.00
		Wick, Katie	46.2	$22,638.00
		Yoo, Jade	47.6	$65,212.00
		Zahiremami, Golshid	19.6	$19,404.00
		Zakia, Jason	147.5	$324,500.00
		Zatz, Andrew	6.0	$12,600.00
B12 Total			**3,259.8**	**$4,219,387.00**
B13	**Exclusivity, Plan & Disclosure Statement**	Abouhashish, Salma	12.1	$10,527.00
		Aquije, Alonso	3.0	$3,330.00
		Beil, Ryan	58.1	$74,368.00
		Bourgault, Jacob	42.1	$36,627.00
		Chase, Ashley	41.9	$66,202.00
		Chitwan, Charu	26.1	$28,971.00
		Ericksen, A.J.	5.4	$11,880.00
		Greissman, Scott	29.7	$74,250.00
		Hirshorn, Deanna	0.8	$392.00
		Hong, Alice	38.2	$52,334.00
		Isaac, Chantal	1.8	$1,566.00
		Kakani, Bhavini	10.8	$9,396.00
		Koster, Charles	7.7	$14,630.00
		Lingle, Barrett	68.8	$94,256.00
		Litz, Dominic	14.6	$20,002.00
		Lupinacci, Frank	14.6	$27,740.00
		Mago, Don	32.2	$31,878.00
		Miranda, Loredana	95.2	$116,144.00
		Pesce, Gregory	19.6	$41,160.00
		Sachdev, Varoon	33.7	$47,854.00
		Shore, Christopher	79.0	$197,500.00
		Smith, Erin	31.0	$50,530.00
		Venes, Aileen	3.7	$1,813.00
		Walz, Jacko	31.2	$27,144.00
		West, Colin	2.5	$4,475.00
		Wick, Katie	24.7	$12,103.00
		Yoo, Jade	24.4	$33,428.00
		Zahiremami, Golshid	7.0	$6,930.00
		Zakia, Jason	23.0	$50,600.00
		Zatz, Andrew	68.5	$143,850.00
B13 Total			**851.4**	**$1,291,880.00**
B14	**Executory Contracts & Unexpired Leases**	Mago, Don	2.7	$2,673.00
		Zahiremami, Golshid	5.5	$5,445.00
		Zatz, Andrew	0.1	$210.00
B14 Total			**8.3**	**$8,328.00**
B15	**Hearings & Court Matters**	Aquije, Alonso	1.4	$1,554.00
		Bourgault, Jacob	8.0	$6,960.00
		Chase, Ashley	27.8	$43,924.00
		Greissman, Scott	31.3	$78,250.00
		Hirshorn, Deanna	5.9	$2,891.00
		Koster, Charles	22.8	$43,320.00
		Lingle, Barrett	3.2	$4,384.00
		Litz, Dominic	0.5	$685.00
		Mago, Don	1.2	$1,188.00
		Miranda, Loredana	17.3	$21,106.00

		Sachdev, Varoon	3.3	$4,686.00
		Shore, Christopher	40.2	$100,500.00
		Smith, Erin	7.6	$12,388.00
		Venes, Aileen	0.6	$294.00
		Walz, Jacko	5.9	$5,133.00
		West, Colin	1.3	$2,327.00
		Wick, Katie	20.3	$9,947.00
		Zahiremami, Golshid	0.1	$99.00
		Zakia, Jason	22.6	$49,720.00
		Zatz, Andrew	11.5	$24,150.00
B15 Total			**232.8**	**$413,506.00**
B16	**Investigation of Causes of Action**	Ahmed, Heidi	6.0	$5,940.00
		Bagdasarian, Amy	5.1	$8,058.00
		Beil, Ryan	198.4	$253,952.00
		Bourgault, Jacob	52.5	$45,675.00
		Chase, Ashley	174.8	$276,184.00
		Chitwan, Charu	4.0	$4,440.00
		Feld, Elizabeth	3.4	$6,086.00
		Greissman, Scott	35.6	$89,000.00
		Hirshorn, Deanna	1.1	$539.00
		Hong, Alice	133.0	$182,210.00
		Kakani, Bhavini	21.2	$18,444.00
		Koster, Charles	0.4	$760.00
		Lingle, Barrett	0.9	$1,233.00
		Litz, Dominic	125.9	$172,483.00
		Ludovici, Stephen	0.2	$222.00
		Mago, Don	97.0	$96,030.00
		Miranda, Loredana	162.3	$198,006.00
		Pesce, Gregory	27.2	$57,120.00
		Quintana, Anastasia	0.3	$261.00
		Rai, Parm	12.1	$13,431.00
		Sachdev, Varoon	100.3	$142,426.00
		Shore, Christopher	0.9	$2,250.00
		Silnicki, Graham	8.9	$13,083.00
		Slattery, Christine	0.5	$350.00
		Venes, Aileen	5.7	$2,793.00
		Walz, Jacko	53.9	$46,893.00
		West, Colin	167.2	$299,288.00
		Wick, Katie	0.6	$294.00
		Yoo, Jade	21.2	$29,044.00
		Zahiremami, Golshid	139.3	$137,907.00
		Zakia, Jason	7.4	$16,280.00
		Zatz, Andrew	77.7	$163,170.00
B16 Total			**1,645.0**	**$2,283,852.00**
B17	**Lien Challenge**	Bagdasarian, Amy	8.8	$13,904.00
		Beil, Ryan	21.3	$27,264.00
		Hirshorn, Deanna	1.0	$490.00
		Isaac, Chantal	4.2	$3,654.00
		Lingle, Barrett	2.0	$2,740.00
		Litz, Dominic	0.3	$411.00
		Mago, Don	4.6	$4,554.00
		Miranda, Loredana	6.4	$7,808.00
		Rai, Parm	11.7	$12,987.00
		Sachdev, Varoon	12.7	$18,034.00
		Silnicki, Graham	10.3	$15,141.00
		Slattery, Christine	25.7	$17,990.00
		Wick, Katie	1.1	$539.00
		Zahiremami, Golshid	8.0	$7,920.00
		Zatz, Andrew	2.9	$6,090.00
B17 Total			**121.0**	**$139,526.00**
B18	**Mediation**	Beil, Ryan	4.1	$5,248.00
		Chase, Ashley	2.5	$3,950.00
		Greissman, Scott	42.4	$106,000.00
		Hong, Alice	1.4	$1,918.00
		Koster, Charles	0.4	$760.00
		Lingle, Barrett	1.3	$1,781.00

		Litz, Dominic	34.0	$46,580.00
		Mago, Don	12.4	$12,276.00
		Miranda, Loredana	3.0	$3,660.00
		Pesce, Gregory	12.6	$26,460.00
		Sachdev, Varoon	23.6	$33,512.00
		Shore, Christopher	21.0	$52,500.00
		Smith, Erin	1.3	$2,119.00
		Walz, Jacko	0.2	$174.00
		West, Colin	2.2	$3,938.00
		Zakia, Jason	13.1	$28,820.00
		Zatz, Andrew	11.3	$23,730.00
B18 Total			**186.8**	**$353,426.00**
B19	**Non-Working Travel**	Greissman, Scott	0.3	$750.00
		Miranda, Loredana	2.3	$2,806.00
		Shore, Christopher	2.0	$5,000.00
B19 Total			**4.6**	**$8,556.00**
B20	**Professional Retention & Fees - W&C**	Beil, Ryan	1.1	$1,408.00
		Greissman, Scott	2.8	$7,000.00
		Koster, Charles	1.8	$3,420.00
		Lingle, Barrett	0.6	$822.00
		Litz, Dominic	10.6	$14,522.00
		Ludovici, Stephen	50.2	$55,722.00
		Venes, Aileen	5.2	$2,548.00
		Walz, Jacko	8.4	$7,308.00
		Wick, Katie	1.4	$686.00
		Yoo, Jade	1.3	$1,781.00
		Zahiremami, Golshid	48.2	$47,718.00
		Zatz, Andrew	1.6	$3,360.00
B20 Total			**133.2**	**$146,295.00**
B21	**Professional Retention & Fees - Other**	Greissman, Scott	0.5	$1,250.00
		Hirshorn, Deanna	0.3	$147.00
		Lingle, Barrett	2.3	$3,151.00
		Litz, Dominic	1.7	$2,329.00
		Ludovici, Stephen	0.7	$777.00
		Mago, Don	0.4	$396.00
		Miranda, Loredana	4.3	$5,246.00
		Walz, Jacko	2.5	$2,175.00
		Wick, Katie	3.3	$1,617.00
		Zahiremami, Golshid	6.0	$5,940.00
		Zatz, Andrew	4.8	$10,080.00
B21 Total			**26.8**	**$33,108.00**
B22	**Reports, Schedules & US Trustee Issues**	Chase, Ashley	1.1	$1,738.00
		Greissman, Scott	0.4	$1,000.00
		Koster, Charles	0.4	$760.00
		Lingle, Barrett	1.0	$1,370.00
		Smith, Erin	2.5	$4,075.00
		Zatz, Andrew	0.3	$630.00
B22 Total			**5.7**	**$9,573.00**
B23	**Tax Issues**	Dreier, David	0.8	$1,880.00
		Gee, Steven	1.4	$2,660.00
		Zatz, Andrew	0.2	$420.00
B23 Total			**2.4**	**$4,960.00**

Exhibit D

Expense Summary for Interim Period

Category	Amount
Airfare	$7,933.99
Business Meals	$72.65
Computer Services	$90.00
Conference Room Dining	$6,194.30
Courier Service	$113.17
Court Costs	$100.00
Deposition Transcripts	$95,154.77
Document Research	$297.20
E-Discovery Data Hosting / Storage	$398.24
E-Discovery Data Processing	$70.00
E-Discovery Production	$130.00
E-Discovery Technical Time	$75.00
E-Discovery User Fees	$2,175.00
Filing Fees	$600.00
Hotel Expense	$15,398.14
Overtime Meals	$281.90
Parking	$212.50
Printing	$2,938.25
Taxi - Business	$4,929.73
Taxi - Overtime	$463.90
Travel Meals	$427.75
UCC Filing Fees	$8,923.75
Grand Total	**$146,980.24**

United States Bankruptcy Court
Southern District of Texas
ENTERED
December 15, 2025
Nathan Ochsner, Clerk

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)
Debtors.[1]	:	(Jointly Administered)

ORDER (I) CONFIRMING SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF 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

Upon the filing by ModivCare Inc. and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "***Debtors***"), of the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates,* dated as of December 5, 2025 [Docket No. 959] (as amended, modified, or supplemented from time to time in accordance with its terms, the "***Plan***"),[2] a copy of which is attached hereto as **Exhibit A**; and this court (this "***Court***") having previously approved the *Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 550], dated as of October 16, 2025 (as amended, modified, or supplemented from time to time in accordance with the Solicitation Procedures Order (as defined below), the "***Disclosure Statement***") and procedures governing the solicitation of acceptances and

[1] A complete list of each of the Debtors in 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.'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.

[2] Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.

rejections of the Plan, in each case pursuant to the *Amended 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 Forms 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. 552] (the "***Solicitation Procedures Order***"); and the Debtors having served the Solicitation Packages and the Notices of Non-Voting Status and Release Opt-Out Forms (each as defined in the Solicitation Procedures Order), which included a copy of the Disclosure Statement, on the Holders of Claims and Existing Parent Equity Interests, pursuant to the Solicitation Procedures Order, as set forth in the *Certificate of Service of Solicitation Materials* [Docket No. 801] and the *Supplemental Certificate of Service* [Docket No. 816] (collectively, the "***Solicitation Affidavits***"); and the Debtors having filed the *Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 725] (as amended, supplemented, or modified from time to time, the "***First Plan Supplement***") on November 14, 2025, the *Notice of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 802] (as amended, supplemented, or modified from time to time the "***Second Plan Supplement***") on November 24, 2025, the *Notice of Filing of Third Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 961] (as amended, supplemented, or modified from time to time the "***Third Plan Supplement***") on December 5, 2025, and the *Notice of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1030]

(as amended, supplemented, or modified from time to time the "***Fourth Plan Supplement***" and together with the First Plan Supplement, the Second Plan Supplement, and the Third Plan Supplement, the "***Plan Supplement***") on December 11, 2025; and the Court having considered the *Debtors' Omnibus Brief (A) in Support of Plan Confirmation and (B) Objecting to Committee's Motions for Standing to Pursue Claims and Lien Challenges* [Docket No. 921] (the "***Confirmation Memorandum***"), the *Declaration of Daniel B. Silvers, Investigating Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 687] (together with the *Supplement Declaration of Daniel B. Silvers, Investigation Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtors Affiliates* [Docket No 803], the "***Silvers Declaration***"), and the *Declaration of Chad J. Shandler in Support of Confirmation of the Debtors' Proposed Plan of Reorganization* [Docket No. 953], and the *Declaration of Zul Jamal in Support of Confirmation of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 952]; and the court having considered the *Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* [Docket No. 728], the *Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims, Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* [Docket No. 729], and the *Official Committee of Unsecured Creditors First Supplement to Lien Challenge Motion* [Docket No. 806] (collectively, the "***Standing Motions***"); and the Court having considered the record in the Chapter 11 Cases, the creditor support for the Plan as evidenced on the record and in the

Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates [Docket No. 916] filed on December 4, 2025, the *Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 993] filed on December 9, 2025, and the *Second Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1018] filed on December 10, 2025, the compromises and settlements embodied in and contemplated by the Plan, the briefs and arguments regarding Confirmation of the Plan and the Standing Motions, the hearing on Confirmation of the Plan and the Standing Motions having commenced on December 8, 2025 (the "***Confirmation Hearing***"), and the evidence adduced at the Confirmation Hearing regarding Confirmation of the Plan and the Standing Motions; and after due deliberation:

IT IS HEREBY FOUND AND DETERMINED THAT:

A. The findings and conclusions set forth in this order (this "***Confirmation Order***") and in the record of the Confirmation Hearing constitute this Court's findings of fact and conclusions of law pursuant to Rule 52 of the Federal Rules of Civil Procedure, as made applicable herein by Bankruptcy Rules 7052 and 9014. To the extent any of the following findings of fact constitute conclusions of law, they are adopted as such. To the extent any of the following conclusions of law constitute findings of fact, they are adopted as such. The Debtors are eligible to be debtors under section 109 of the Bankruptcy Code and, pursuant to the Local Bankruptcy Rules, the Debtors consent to entry of a final order by the Court in accordance with the terms set forth herein to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The Debtors are proper plan proponents under section 1121(a) of the Bankruptcy Code.

B. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Order of Reference to Bankruptcy Judges* from the United States District Court for the Southern District of Texas, dated May 24, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and this Court has jurisdiction to enter a final order with respect thereto.

C. Each of the Debtors has met the burden of proving that the Plan satisfies the requirements of sections 1129(a) and 1129(b) of the Bankruptcy Code by a preponderance of the evidence.

D. The Plan was solicited in good faith and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. As is evidenced by the Solicitation Affidavits, the transmittal and service of the Plan, the Disclosure Statement, the Solicitation Packages, and the Notices of Non-Voting Status and Release Opt-Out Forms complied with the Solicitation Procedures Order and was adequate and sufficient under the circumstances. All parties required to be given notice of the Confirmation Hearing (including the deadline for filing and serving objections to confirmation of the Plan) have been given due, proper, timely, and adequate notice in accordance with the Solicitation Procedures Order and in compliance with the Bankruptcy Code, the Bankruptcy Rules, and applicable non-bankruptcy law, and such parties have had a full and fair opportunity to appear and be heard with respect thereto. No additional or further notice is required under the circumstances.

E. The Plan has been proposed in good faith and not by any means forbidden by law. In so finding, this Court has considered the totality of the circumstances of the Chapter 11 Cases, and found that all constituencies acted in good faith. The Plan is the result of extensive, good faith,

arm's length negotiations among the Debtors and their principal constituencies.

F. With respect to each Debtor, the votes to accept or reject the Plan have been solicited and tabulated fairly, in good faith, and in a manner consistent with the Bankruptcy Code, the Bankruptcy Rules and the Solicitation Procedures Order.

G. The Holders of First Lien Claims (Class 3) and the Holders of General Unsecured Claims (Class 4) (each a "***Voting Accepting Class***" and together the "***Voting Accepting Classes***") have voted to accept the Plan in accordance with section 1126(c) of the Bankruptcy Code.

H. Each Voting Accepting Class is impaired within the meaning of section 1124 of the Bankruptcy Code. Because at least one impaired Class has voted to accept the Plan without including any acceptance of the Plan by any insider, section 1129(a)(10) of the Bankruptcy Code is satisfied.

I. The Plan satisfies section 1129(a)(7) of the Bankruptcy Code. The liquidation analysis set forth in Exhibit C to the Disclosure Statement and other evidence proffered or adduced at the Confirmation Hearing establishes that each Holder of a Claim or Interest in an Impaired Class either has accepted the Plan or will receive or retain under the Plan, on account of such Allowed Claim or Interest, property of a value, as of the Effective Date of the Plan, that is not less than the amount that it would receive if the Debtors were liquidated under Chapter 7 of the Bankruptcy Code on such date.

J. Holders of Subordinated Unsecured Notes Claims (Class 5) have voted to reject the Plan in accordance with section 1126(c) of the Bankruptcy Code. The Holders of Subordinated Claims (Class 7) and the Existing Parent Equity Interests (Class 9) are deemed to have rejected the Plan (Class 5, Class 7, and Class 9, each a "***Rejecting Class***" and, collectively, the "***Rejecting Classes***"). The Court finds, based on the record of the Chapter 11 Cases and the evidence

presented and adduced at the Confirmation Hearing, that the Plan does not discriminate unfairly and is fair and equitable with respect to the Rejecting Classes, as required by sections 1129(b)(1) and (b)(2) of the Bankruptcy Code, because (i) no Holder of any Claim or Interest that is junior to the interests represented by the Rejecting Classes will receive or retain any property under the Plan on account of such junior Claim or Interest and (ii) no Holder of a Claim in a Class senior to the Rejecting Classes is receiving more than 100% recovery on account of its Claim. Thus, the Plan may be confirmed notwithstanding the rejection of the Plan by the Rejecting Class.

K. The classification of Claims and Interests under the Plan is proper and satisfies the requirements of the Bankruptcy Code. Pursuant to sections 1122(a) and 1123(a)(1) of the Bankruptcy Code, Article III of the Plan provides for the separate classification of Claims and Interests into nine Classes, based on differences in the legal nature or priority of such Claims and Interests (other than Administrative Claims (including Professional Fee Claims), DIP Claims, Priority Tax Claims, and statutory fees, which are addressed in Article II of the Plan and which have not been classified in accordance with section 1123(a)(1) of the Bankruptcy Code). Valid business, factual, and legal reasons exist for the separate classification of the various Classes of Claims and Interests created under the Plan, the classifications were not done for any improper purpose, and the creation of such Classes does not unfairly discriminate between or among Holders of Claims or Interests. As required by section 1122(a) of the Bankruptcy Code, each Class of Claims and Interests contains only Claims or Interests that are substantially similar to the other Claims or Interests within that Class.

L. The Court finds, based on the record of the Chapter 11 Cases and the evidence presented and adduced at the Confirmation Hearing that the Debtor Release provided pursuant to Section 10.6(a) of the Plan represents a sound exercise of the Debtors' business judgment, was

negotiated in good faith and at arms' length, and formed an essential part of the agreement among the parties participating in the negotiation and formulation of the Plan. In addition, for the reasons set forth in the Confirmation Memorandum and the evidence adduced at the Confirmation Hearing, the Third-Party Release provided pursuant to Section 10.6(b) of the Plan is consensual and binding on all creditors to the extent set forth therein and herein. All impaired creditors were given an opportunity to "opt out" of such release in accordance with the Plan and the Solicitation Procedures Order. Moreover, the Released Parties played an integral role in the formulation of the Plan, have made significant contributions that are essential to the Plan's success, and have expended significant time and resources analyzing and negotiating the Plan and the issues presented by the Debtors' prepetition capital structure. Accordingly, the Court finds, based on the record of the Chapter 11 Cases and the evidence presented and adduced at the Confirmation Hearing, that the releases provided pursuant to Section 10.6 of the Plan are: (i) in exchange for the good and valuable consideration provided by the Released Parties; (ii) a good faith settlement and compromise of the Claims and Causes of Action released by the Plan; (ii) in the best interests of the Debtors and their Estates; (iv) fair, equitable, and reasonable under the circumstances; and (v) given and made after due notice and opportunity for hearing.

M. The exculpation provided by Section 10.7 of the Plan for the benefit of the Exculpated Parties (the "***Exculpation***") is appropriate under applicable law, including *In re Highland Capital Mgmt.*, L.P., 48 F.4th 419 (5th Cir. 2022), because it is an integral part of a Plan, supported by the evidence in the record at the Confirmation Hearing, proposed in good faith, formulated following extensive good faith, arm's-length negotiations with key constituents, and appropriately limited in scope to the parties that served as fiduciaries in the Chapter 11 Cases. The Exculpation, including its carve-out for willful misconduct, actual fraud, and gross negligence, is

consistent with the applicable law and established practice in this jurisdiction and others.

N. The Court finds that the relief requested by the Committee in the Standing Motions should be denied on the merits for the reasons more fully set forth by the Court on the record at the Confirmation Hearing.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

I. Confirmation of the Plan

1. The Plan is confirmed pursuant to section 1129 of the Bankruptcy Code.

2. Any and all objections to Confirmation of the Plan that have not been resolved, withdrawn, waived, or settled and all reservations of rights included therein, are overruled on the merits and for the reasons set forth on the record at the Confirmation Hearing. Notwithstanding the foregoing, the rights and objections of any party that properly Filed and served an objection to the assumption, or assumption and assignment, of its Executory Contract or Unexpired Lease, including (without limitation) an objection regarding the amount of its proposed Cure Claim (such amount, as set forth on the applicable Assumption Notice (as defined in the Solicitation Procedures Order), the "***Proposed Cure***") or the applicable Debtor's ability to provide adequate assurance of future performance are reserved. Any dispute (an "***Assumption Dispute***") regarding the assumption, or assumption and assignment, of the applicable Executory Contract or Unexpired Lease, including (without limitation), the Proposed Cure or the applicable Debtor's ability to provide adequate assurance of future performance, shall be resolved in accordance with paragraph 36 of this Confirmation Order.

3. The Debtors and the Reorganized Debtors (as applicable) are authorized to take all actions required under the Plan and to effectuate the Plan and the transactions contemplated therein. The terms of the Plan, the Plan Supplement, the Definitive Documents, and the exhibits and schedules thereto are incorporated by reference into, and are an integral part of, this

Confirmation Order. The terms of the Plan, the documents contained in the Plan Supplement, Definitive Documents, all exhibits thereto, and all other relevant and necessary documents, shall be effective and binding as of the Effective Date. The failure to include or reference any particular provision of the Plan or Plan Supplement in this Confirmation Order shall not diminish or impair the effectiveness of such provision, it being the intent of the Court that the Plan be confirmed in its entirety and such provisions shall have the same binding effect, enforceability, and legality as every other provision of the Plan. Each term and provision of the Plan, as it may have been altered or interpreted by the Court, is valid and enforceable pursuant to its terms.

4. The terms of the Plan and all transactions contemplated by the Plan, shall be effective and binding as of the Effective Date. Subject to the terms of the Plan, the Debtors reserve the right to alter, amend, update or modify the Plan Supplement, the Definitive Documents, and any documents contained therein up until, and through, the Effective Date. The failure to specifically include or refer to any particular article, section, or provision of the Plan, the Plan Supplement, the Definitive Documents, or any related document in this Confirmation Order does not diminish or impair the effectiveness or enforceability of such article, section, or provision, which are approved in their entirety.

5. This Confirmation Order shall constitute all approvals and consents required, if any, by the laws, rules or regulations of any state or any other governmental authority with respect to the implementation or consummation of the Plan and any other acts that may be necessary or appropriate for the implementation or consummation of the Plan. Pursuant to the applicable provisions of the corporate and limited liability company laws of the states where the Debtors are organized, other applicable non-bankruptcy law, and section 1142(b) of the Bankruptcy Code, no action of the respective directors or stockholders of the Debtors shall be required to authorize the

Debtors or the Reorganized Debtors, as applicable, to enter into, execute, deliver, file, adopt, amend, restate, consummate, or effectuate, as the case may be, the Plan and any Definitive Documents, contract, instrument, or other document to be executed, delivered, adopted, or amended in connection with implementation of the Plan.

6. Subject to payment of any applicable filing fees under applicable non-bankruptcy law, each federal, state, commonwealth, local, foreign or other governmental agency shall accept for filing and/or recording any and all documents, mortgages and instruments necessary or appropriate to effectuate, implement or consummate the transactions contemplated by the Plan and this Confirmation Order. To the fullest extent permitted by section 1146(a) of the Bankruptcy Code, any transfers of property pursuant to, in contemplation of, or in connection with the Plan shall not be subject to any stamp tax, document recording tax, conveyance fee, intangibles, or similar tax, mortgage tax, real estate transfer tax, mortgage recording tax, sales or use tax, Uniform Commercial Code filing or recording fee, regulatory filing or recording fee, or other similar tax or governmental assessment in the United States, and this Confirmation Order hereby directs the appropriate state or local governmental officials or agents to forgo the collection of any such tax or governmental assessment and to accept for filing and recordation instruments or other documents pursuant to such transfers of property without the payment of any such tax or governmental assessment. Such exemption specifically applies, without limitation, to (a) the creation, modification, consolidation, or recording of any mortgage, deed of trust, Lien, or other security interest, or the securing of additional indebtedness by such or other means, (b) the making, assignment, or recording of any lease or sublease, (c) any of the Restructuring Transactions authorized by the Plan, and (d) the making or delivery of any deed or other instrument of transfer under, in furtherance of, or in connection with the Plan, including: (i) any merger agreements;

(ii) agreements of consolidation, restructuring, disposition, liquidation, or dissolution; (iii) bills of sale; or (iv) assignments executed in connection with any of the Restructuring Transactions.

7. The compromises and settlements set forth in the Plan are approved pursuant to Bankruptcy Rule 9019.

8. The assumption, on and as of the Effective Date, by the Debtors of all (a) existing Employee Plans and (b) all insurance policies (including, without limitation the D&O Policies) to which any Debtor is a party as of the Effective Date, as set forth in the Plan, is hereby approved.

9. For the avoidance of doubt, pursuant to Bankruptcy Rule 3020(c)(1), the following provisions in the Plan are hereby approved in full and will be effective immediately on the Effective Date without further order or action by this Court, any of the parties to such release, or any other Person or Entity: (a) Releases by the Debtors (Section 10.6(a)); (b) Releases by Holders of Claims and Interests (Section 10.6(b)); (c) Exculpation (Section 10.7); and (d) Permanent Injunction (Section 10.5).

10. The amendments and modifications to the solicitation version of the *First Amended Joint Chapter 11 Plan of ModivCare Inc. and its Debtor Affiliates* [Docket No. 465] since the filing thereof, including as reflected and incorporated into the Plan, are shown in the redline filed with the Court on December 5, 2025 [Docket No. 960, Exhibit A]. Adequate and sufficient notice of such amendments and modifications (collectively, the "***Subsequent Plan Modifications***") has been given. The Subsequent Plan Modifications do not individually, or in the aggregate, materially or adversely affect or change the treatment of any Claim against, or interest in, any of the Debtors. Accordingly**,** no other or further notice, disclosure under section 1125 of the Bankruptcy Code, nor resolicitation of votes under section 1126 of the Bankruptcy Code, is or shall be required and such Subsequent Plan Modifications are approved in full in accordance with section 1127(a) of the

Bankruptcy Code and Bankruptcy Rule 3019(a). The Plan, as modified by the Subsequent Plan Modifications, is deemed accepted by all creditors who have previously accepted the Plan and the Subsequent Plan Modifications do not require that Holders of Claims be afforded an opportunity to change previously cast acceptances or rejections of the Plan. All rights of the Debtors or the Reorganized Debtors to modify the Plan and the documents that comprise the Plan Supplement, in accordance with the terms thereof, are reserved.

11. Pursuant to section 1141 of the Bankruptcy Code and the other applicable provisions of the Bankruptcy Code, effective as of the Effective Date, the provisions of the Plan shall be binding on (a) the Debtors and the Reorganized Debtors, (b) all Holders of Claims against, and Interests in, the Debtors, whether or not Impaired under the Plan and whether or not such Holders have accepted or rejected the Plan or affirmatively voted to reject the Plan, (c) each Person or Entity receiving, retaining or otherwise acquiring property under the Plan, and (d) any non-Debtor party to an Executory Contract or Unexpired Lease with the Debtors.

12. The applicable Debtors or Reorganized Debtors are authorized to consummate the Restructuring Transactions described in or contemplated by Section 5.1 of the Plan, subject to the terms and conditions set forth therein, in this Confirmation Order and in the Definitive Documents.

13. The existing directors of ModivCare in their capacities as such will be deemed to have resigned as directors of ModivCare on and as of the Effective Date, in each case without further notice to or order of the Bankruptcy Court, act or action under applicable law, regulation, order, or rule or the vote, consent, authorization or approval of any Person or Entity.

14. Except as otherwise provided in the Plan, the Exit Facilities Documents, or in any contract, instrument, release, or other agreement or document created pursuant to the Plan, on the Effective Date and concurrently with the applicable distributions made pursuant to the Plan and,

in the case of a Secured Claim, satisfaction in full of the portion of the Secured Claim that is Allowed as of the Effective Date, all mortgages, deeds of trust, Liens, pledges, or other security interests against any asset or property of the Debtors shall be fully released and discharged, and all of the right, title, and interest of any holder of such mortgages, deeds of trust, Liens, pledges, or other security interests shall revert to the Reorganized Debtors and their successors and assigns, free and clear of such mortgages, deeds of trust, Liens, pledges, or other security interests and without further notice to or order of this Court, act or action under applicable law, regulation, order, or rule or the vote, consent, authorization or approval of any Person or Entity.

15. The Debtors shall cause to be served a notice of the entry of this Confirmation Order and occurrence of the Effective Date, substantially in the form attached hereto as **Exhibit B** (the "***Effective Date Notice***"), upon (a) all parties listed in the creditor matrix maintained by the Solicitation Agent (as defined in the Solicitation Procedures Order) and (b) such additional persons and entities as deemed appropriate by the Debtors, no later than five (5) business days after the Effective Date. The Debtors shall cause a copy of the Effective Date Notice to be published in *The New York Times* or a similar publication of national circulation within seven (7) business days after the Effective Date.

II. Dissolution of the Committee

16. On the Effective Date, the current and former members of the Committee, and their respective officers, employees, attorneys, financial advisors, and other agents, will be released from all further authority, duties, responsibilities and obligations related to, and arising from, and in connection with, the Chapter 11 Cases and the Committee will dissolve; *provided, however*, that following the Effective Date, the Committee will continue in existence and have standing and a right to be heard for the following limited purpose of pursuing the payment in full in Cash of

Professional Fee Claims and filing and prosecuting fee applications, including any final fee applications, Filed pursuant to sections 330 and 331 of the Bankruptcy Code. Following the completion of the Committee's remaining duties set forth above, the Committee will be dissolved, and the retention or employment of the Committee's respective attorneys, accountants and other agents will terminate without further notice to, or action by, any Entity. For the avoidance of doubt, nothing set forth herein shall permit any professional engaged by the Committee or the Debtors to seek payment of an Administrative Claim from either the Debtors' estates or the Reorganized Debtors for (a) any fees incurred in defending any fee applications or (b) otherwise in connection with any objection to such fees or fee applications, in each case, without further order from the Court.

III. The Exit Facilities

17. The Debtors and Reorganized Debtors, as applicable, are hereby authorized to enter into, and take such actions as necessary or desirable to perform under, the Exit Facilities and, in each case, the Exit Facilities Documents, all documents or agreements related thereto, including the payment or reimbursement of any fees, indemnities and expenses under or pursuant to any such documents and agreements in connection therewith. Upon the closing of the Exit Facilities, the lenders under the Exit Facility thereunder shall have valid, binding, perfected and enforceable Liens on the collateral specified in the Exit Facilities Documents with the priority set forth in the Exit Facilities Documents, and subject only to such Liens and security interests as may be permitted under the Exit Facilities Documents, and the Debtors and Reorganized Debtors are hereby authorized to make any and all filings and recordings necessary or desirable in connection with such Liens.

18. The obligations, guarantees, mortgages, pledges, Liens and other security interests granted pursuant to or in connection with the Exit Facilities are granted in good faith, for good and valuable consideration and for legitimate business purposes as an inducement to the lenders under the Exit Facilities to extend credit thereunder and shall be, and hereby are, deemed not to constitute a fraudulent conveyance or fraudulent transfer and shall not otherwise be subject to avoidance or recharacterization.

IV. Administrative Claims Bar Date

19. Except as otherwise provided in the DIP Orders, the *Order Establishing (A) 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. 66], or the Plan, requests for payment of Administrative Claims must be filed with the Court and served on the Debtors or Reorganized Debtors (as the case may be) and the Solicitation Agent within thirty (30) days from the date of service of the Effective Date Notice. Such proof of Administrative Claim must include at a minimum: (a) the name of the applicable Debtor that is purported to be liable for the Administrative Claim and if the Administrative Claim is asserted against more than one Debtor, the exact amount asserted to be owed by each such Debtor; (b) the name of the Holder of the Administrative Claim; (c) the asserted amount of the Administrative Claim; (d) the basis of the Administrative Claim; and (e) supporting documentation for the Administrative Claim; *provided*, *however*, that the foregoing shall not apply to the Holders of Claims arising under section 503(b)(1)(D) of the Bankruptcy Code or the United States Trustee as the Holder of Administrative Claims. **FAILURE TO FILE AND SERVE SUCH PROOF OF ADMINISTRATIVE CLAIM TIMELY AND PROPERLY SHALL RESULT IN SUCH CLAIM BEING FOREVER BARRED AND DISCHARGED**.

V. Resolution of Other Matters.

20. Treatment of ASIC and Applied Surety Bond Agreements.[3] Notwithstanding any other provisions of the Plan, Plan Supplement, this Confirmation Order or any other Order of the Bankruptcy Court in the Chapter 11 Cases, on the Effective Date, any rights and obligations arising under or with respect to: (a) the Surety Bonds; (b) any Surety Bond Indemnity Agreements; (c) any Surety collateral, including, without limitation, cash, letters of credit, and/or the proceeds of any such collateral (the "***Surety Collateral***"); and (d) any Surety agreements governing Surety Collateral (items (a), (b), (c), and (d) collectively, the "***ASIC and Applied Surety Bond Agreements***") shall be deemed reaffirmed and ratified by the applicable Reorganized Debtors and Surety Bond Indemnitors, shall continue in full force and effect, and the rights and obligations thereunder and with respect thereto shall not be altered, modified, discharged, enjoined, impaired or released by the Plan, any Plan Supplement, or this Confirmation Order. For the avoidance of doubt, nothing in the Plan, Plan Supplement or this Confirmation Order or any Order entered in the Chapter 11 Cases, including, without limitation, any exculpation, release, injunction, exclusions and discharge provision contained in Article X of the Plan, shall bar, alter, limit, impair, release, modify or enjoin any rights and obligations of the parties under the ASIC and Applied

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[3] For purposes of this paragraph, these definitions shall be applicable:

"***Applied***" means Applied Surety Underwriters, and/or any of the companies for which Applied Surety Underwriters underwrites surety bonds, including, without limitation, SiriusPoint America Insurance Company.

"***ASIC*** means Atlantic Specialty Insurance Company.

"***Surety***" means each of Applied or ASIC. "***Sureties***" means ASIC and Applied.

"***Surety Bonds***" means those certain surety bonds issued by Surety, prior to and after the Petition Date, on behalf of certain of the Debtors.

"***Surety Bond Indemnitors***" means those certain Debtors party to the ASIC and Applied Surety Bond Agreements.

"***Surety Bond Indemnity Agreements***" means those certain indemnity agreements and/or related agreements, including without limitation, agreement regarding collateral entered into prior to and/or after the Petition Date, in the ordinary course of business, by certain of the Debtors and Surety.

Surety Bond Agreements or applicable law. Surety is deemed to have opted out of any release provisions of the Plan that apply or could be interpreted to apply to Surety. Solely to the extent any of the ASIC and Applied Surety Bond Agreements are deemed to be one or more executory contracts, any such agreements are deemed assumed by the Debtors and the Reorganized Debtors pursuant to section 365 of the Bankruptcy Code effective as of the Effective Date with the consent of the Surety. If on and after the Effective Date any one of the ASIC and Applied Surety Bond Agreements ceases to be in effect solely as a result of a determination by a court of competent jurisdiction that such agreements are non-assumable under applicable bankruptcy law, any such ASIC and Applied Surety Bond Agreements shall be deemed reinstated or ratified on the terms of such Surety Bond Agreement that existed immediately prior to the Effective Date and the Reorganized Debtors will take reasonable steps to execute such documents as may be necessary to effect the reinstatement of such ASIC and Applied Surety Bond Agreements on such terms that existed immediately prior to the Effective Date. Nothing in the Plan, Plan Supplement, Confirmation Order or any Order entered in the Chapter 11 Cases shall affect in any way the Surety's rights against any non-Debtor, or any non-Debtor's rights against the Surety, including under any ASIC and Applied Surety Bond Agreement.

21. Treatment of Chubb Surety Bond Agreements. Notwithstanding anything to the contrary in the Plan, Restructuring Support Agreement, any other document related to any of the foregoing, or any other order of this Court (including, without limitation, any other provision that purports to be preemptory or supervening, grants an injunction, discharge or release, confers this Court jurisdiction, or requires a party to opt out of any releases) (for purposes of this section, the "***Plan Documents***"), nothing in the Plan Documents shall in any way prime, discharge, impair, modify, subordinate or affect the rights of Westchester Fire Insurance Company, Federal Insurance

Company and/or their past, present or future affiliated sureties (each as surety in its role as an issuer of bonds, individually and collectively referred to herein as "***Chubb Surety***") as to:

(a) surety bonds or similar instruments issued or executed by Chubb Surety on behalf of any of the Debtors and/or non-debtor affiliates (collectively, and together with those bonds or similar instruments in which any of the Reorganized Debtors is becoming the principal, as set forth in paragraph 22(a), below (the "***Chubb Bonds***"), all of the obligations under each and every one of the Chubb Bonds shall hereafter be referred to individually and collectively as the "***Chubb Bonded Obligations***"); *provided*, *however*, that the Chubb Bonds and Chubb Bonded Obligations shall be recognized and enforced consistent with applicable nonbankruptcy law;

(b) any indemnity agreement executed by any Debtor and/or non-debtor affiliates, including but not limited to the Agreement of Indemnity executed by Charter LCI Corporation and LogistiCare, Inc. (now Debtor ModivCare Solutions, LLC) on or about February 6, 2007, and the Agreement of Indemnity executed by Providence Service Corporation (now Debtor ModivCare Inc.) on or about February 21, 2008, as well as an Agreement of Indemnity executed by Debtors ModivCare Solutions, LLC and ModivCare Inc. on or about September 2, 2025, (the "***Indemnity Agreements***");

(c) any funds or instruments the Surety is holding and/or that are being held for or for the benefit of the Surety presently or in the future, including but not limited to cash collateral totaling $7,360,000.00 procured pursuant to certain cash collateral agreements between the Debtors and Chubb Surety (the "***Cash Collateral Agreements***"), whether in trust, as security, or otherwise, including any payments the Surety receives from an indemnitor or proceeds due or to become due to any of the Debtors or their non-debtor affiliates in relation to contracts or obligations for which the Surety has issued or may in the future issue any bond or related instrument, including any Bond; *provided*, *however*, that any use, application, or retention of such funds shall be in accordance with the Cash Collateral Agreements and Indemnity Agreements, and/or as otherwise permitted by applicable nonbankruptcy law;

(d) any rights, remedies and/or defenses Chubb Surety may now or in the future have with respect to any and all Chubb Bonds and/or related instruments issued and/or executed by Chubb Surety on behalf of any of the Debtors and/or their non-Debtor affiliates to the extent set forth in the Chubb Surety Documents (as defined below) and/or otherwise permitted by applicable nonbankruptcy law;

(e) current or future setoff and/or recoupment rights and/or the lien rights and/or trust fund claims of Chubb Surety or any party to whose rights Chubb Surety has or may be subrogated as related to any Chubb Bonded Obligations, and/or any existing or future subrogation or other common law rights of Chubb Surety to the extent set

forth in the Chubb Surety Documents and/or otherwise permitted by applicable nonbankruptcy law; and

(f) any related documents (together with the Chubb Bonds, Indemnity Agreements, and the Cash Collateral Agreements, collectively, the "***Chubb Surety Documents***"), as well as, any and all subrogation rights, all of which are neither affected nor impaired by the Plan Documents.

22. Notwithstanding anything in the Plan Documents to the contrary:

(a) any and all active Chubb Bonds in place as of the Effective Date shall survive the Effective Date and one or more of the Reorganized Debtors ("***Assuming Reorganized Debtor***") shall become the principal on the Chubb Bonds in lieu of the current principal or principals as of the Effective Date;

(b) the Indemnity Agreements, Cash Collateral Agreements and Chubb Bonds shall be assumed by one or more of the Assuming Reorganized Debtors and assigned to the Assuming Reorganized Debtor and, Chubb Surety shall be entitled to reasonable and documented attorneys' fees and costs and, without duplication, any cure amounts, without having to file an administrative claim, request for payment, cure objection, or fee application; *provided*, that (i) any such cure amounts shall be limited to those incurred and payable in accordance with the Chubb Surety Documents and applicable law, (ii) shall be supported by reasonably detailed invoices and documentation, which may be redacted as to privilege, and (iii) any cure amounts that remain outstanding as of the Effective Date shall become the obligation of the Assuming Reorganized Debtor;

(c) on and after the Effective Date, the Assuming Reorganized Debtor shall comply with all obligations of the Debtors relating to the Chubb Bonds under the Indemnity Agreements as if the Reorganized Debtor had executed the Indemnity Agreements;

(d) Chubb Surety may, amend the Chubb Bonds and/or Indemnity Agreements to name the Assuming Reorganized Debtor and/or require the Assuming Reorganized Debtor to execute a new indemnity agreement; *provided*, that any such amendments or new agreements shall be limited to those reasonably necessary to reflect the change in principal and maintain the existing risk profile, and shall not impose materially more onerous terms than existed immediately prior to the Effective Date absent the Assuming Reorganized Debtor's consent; and

(e) Chubb Surety reserves all of its rights to modify, amend, extend, and/or cancel any and all of the active Chubb Bonds as permitted by the Chubb Surety Documents and/or under applicable law; *provided*, that any such action shall be consistent with the terms of the applicable Bond; *provided*, *further*, that Chubb Surety has no obligation to issue or execute any new bonds on behalf of any entity, or to extend, modify, renew or increase the amount of any Chubb Bonds, except as expressly agreed to in writing.

23. Nothing in the Plan Documents, or any documents related to the foregoing, shall prime or otherwise impact: (a) current or future setoff and/or recoupment rights and/or the lien rights and/or trust fund claims of Chubb Surety or any party to whose rights Chubb Surety has or may be subrogated as it relates to Chubb Bonded Obligations and/or (b) any existing or future subrogation or other common law rights of Chubb Surety. For the avoidance of doubt, Section 6.16 of the Plan (Satisfaction of Claims) shall not apply to Chubb Surety. For the avoidance of doubt, Section 8.1(a) of the Plan (assumption of executory contracts on the effective date) shall not apply to Chubb Surety. For the avoidance of doubt, Section 10.5(d) (injunction as to setoff or recoupment) shall not apply to Chubb Surety or its bond beneficiaries. Notwithstanding any other provision in the Plan Documents to the contrary, if a claim or claims is or are asserted against any of the Chubb Bonds, then the Surety shall be granted reasonable access to, and may make copies of, any books and records that may be held by the Debtors and/or the Reorganized Debtors relating to any such claim; *provided*, that such access shall be upon reasonable prior notice, subject to customary confidentiality obligations, and limited to materials reasonably necessary to evaluate, defend, or resolve the specific claim asserted. To the extent the Effective Date does not occur, this paragraph 23 will be of no force and effect, and the parties' rights are reserved; *provided*, that nothing in any other section of this Confirmation Order shall negate any of the rights of Chubb Surety or of any of the obligees under any of the Chubb Bonds.

24. Treatment of the Chubb Insurance Program. Notwithstanding anything to the contrary in the Definitive Documents, Restructuring Support Agreement, any other document related to any of the foregoing, or any other order of the Court (including, without limitation, any other provision that purports to be preemptory or supervening, grants an injunction, discharge or release, confers Court jurisdiction, or requires a party to opt out of any releases):

(a) on the Effective Date, all of the insurance policies which have been issued by ACE American Insurance Company, Federal Insurance Company and any of their respective U.S.-based affiliates and predecessors (together with ESIS, Inc., and solely in their capacities as insurers and third party administrators, the "***Chubb Companies***") to, or which provide coverage to, any of the Debtors (or any of their predecessors) at any time and for any line of coverage (collectively and together with any agreements, documents or instruments related thereto entered into by, or issued for the benefit of, the Chubb Companies, and each as amended, modified or supplemented and including any exhibit or addenda thereto, the "***Chubb Insurance Program***") shall be assumed in their entireties by the applicable Debtors and the Reorganized Debtors pursuant to sections 105 and 365 of the Bankruptcy Code, and shall continue in full force and effect thereafter in accordance with their respective terms and shall survive unimpaired under the Plan;

(b) on and after the Effective Date, the Reorganized Debtors shall become and remain jointly and severally liable in full for all of their and the Debtors' obligations under the Chubb Insurance Program regardless of whether such obligations arise before or after the Effective Date and without the requirement or need for the Chubb Companies to file a Proof of Claim or an Administrative Claim, Cure Claim, object to any cure amount, or file a motion for setoff or recoupment;

(c) nothing (including Article VIII, Sections 8.5 and 8.6 of the Plan or any corresponding paragraphs of this Confirmation Order) shall alter or modify the terms and conditions of the Chubb Insurance Program, and any rights and obligations thereunder shall be determined in accordance with the terms thereof and applicable non-bankruptcy law;

(d) except as set forth in the Chubb Insurance Program, nothing shall permit or otherwise effectuate a sale, assignment or other transfer of the Chubb Insurance Program and/or any rights, benefits, claims, proceeds, rights to payment, or recoveries under and/or relating to the Chubb Insurance Program, or any collateral provided on account of the Chubb Insurance Program, without the prior express written consent of the Chubb Companies;

(e) the automatic stay of section 362(a) of the Bankruptcy Code and the injunctions set forth in Article X, Section 10.5 of the Plan, if and to the extent applicable, shall be deemed lifted without further order of the Bankruptcy Court, solely to permit: (i) claimants with valid workers' compensation or direct action claims against the Chubb Companies under applicable non-bankruptcy law to proceed with their claims; (ii) the Chubb Companies to administer, handle, defend, settle, and/or pay, in the ordinary course of business and without further order of this Bankruptcy Court: (1) workers' compensation claims, (2) claims where a claimant asserts a direct claim against the Chubb Companies under applicable non-bankruptcy law, (3) claims where an order has been entered by this Bankruptcy Court granting a claimant relief from the automatic stay or the injunction set forth in Article X, Section 10.5 of the Plan to proceed with its claim; and (4) all costs in relation to each of the foregoing; (iii) the Chubb Companies to draw against any or all of the

collateral or security provided by or on behalf of the Debtors (or the Reorganized Debtors, as applicable) at any time and to hold the proceeds thereof as security for the obligations of the Debtors (and the Reorganized Debtors, as applicable) and/or apply such proceeds to the obligations of the Debtors (and the Reorganized Debtors, as applicable) under the Chubb Insurance Program, in such order as the Chubb Companies may determine in accordance with and subject to the terms and conditions of the Chubb Insurance Program; and (iv) the Chubb Companies to cancel the Chubb Insurance Program, and take other actions relating thereto (including effectuating a setoff or recoupment) in accordance with and subject to the terms and conditions of the Chubb Insurance Program and applicable non-bankruptcy law; *provided*, *however*, that the Debtors, the Reorganized Debtors and Chubb Companies reserve all of their respective rights and defenses, if any, under applicable non-bankruptcy law and the Chubb Insurance Program to the extent Chubb Companies takes any action permitted by this sub-paragraph (e)(iv); and

(f) nothing in the second paragraph of Article X, Section 10.5 of the Plan or any corresponding paragraph of this Confirmation Order requires, precludes and/or prohibits the Chubb Companies to or from administering, handling, defending, settling and/or paying claims covered by the Chubb Insurance Program in accordance with and subject to the terms and conditions of the Chubb Insurance Program and/or applicable non-bankruptcy law.

For the avoidance of doubt, nothing herein expands, limits or affects the rights of the Chubb Companies under the Chubb Insurance Program.

25. Treatment of the Endurance Insurance Programs. Notwithstanding anything to the contrary in this Confirmation Order, the Plan, or any related Assumption Notice, the policies issued by Endurance American Specialty Insurance Company ("***Endurance***"), including but not limited to two Healthcare Professional Services Liability, General Liability, and Employee Benefits Liability Policies issued to non-Debtor OEP AM Holdings, LLC, bearing Policy Nos. HLA100148512500 and HLA100148512501 (the "***Policies***"), which include a number of Debtors as additional insureds, shall be assumed solely to the extent of the applicable Debtors' remaining rights thereunder. In conformance with Debtors' cure obligations, Debtors shall pay $42,901.17 to Endurance within thirty (30) days of the Effective Date. Further, as allowed by the Insurance Order, Debtors or Reorganized Debtors (as applicable) shall timely pay all deductibles and other amounts due under the Policies as they come due, and Endurance is authorized to pay defense

costs and other amounts under the Policies pursuant the terms of the Policies. Nothing contained in the Plan or this Confirmation Order shall alter, modify, or amend any terms and conditions in the Policies or the rights and obligations of the Debtors, Reorganized Debtors or Endurance thereunder (including any defenses to coverage) and, for the avoidance of doubt, Endurance shall not be required to pay or satisfy any amounts in excess of any amounts required by any of the applicable Policies or to cover or pay any claims or costs that Endurance would otherwise not pay under the Policies.

26. Treatment of the Humana Insurance Programs. As to Humana Inc., Humana Insurance Company, Humana Medical Plan, Inc., Humana Insurance Company of Florida, Inc., and their affiliates ("***Humana***") and the Debtors, nothing in the Plan, this Confirmation Order, or related Plan documents shall enjoin or impair any statutory or common law setoff rights as recognized in section 553 of the Bankruptcy Code and applicable bankruptcy and nonbankruptcy law, or the recoupment rights of Humana or the Debtors in their contracts. All such setoff and recoupment rights of Humana and the Debtors are preserved and are not required to have been asserted prior to the Confirmation Date. For all Humana contracts assumed under the Plan, in lieu of cure, all obligations due and unpaid under the contracts accruing prior to the Effective Date shall be unimpaired and will be paid or collected in the ordinary course of business.

27. Humana shall not be considered a Releasing Party or a Released Party. Notwithstanding anything to the contrary in the Plan, this Confirmation Order, or related Plan documents, nothing therein shall be deemed as a waiver or relinquishment of any rights, claims, causes of action, rights of setoff or recoupment, or other legal or equitable claims or defenses that Humana and the Debtors and Reorganized Debtors may have under bankruptcy or non-bankruptcy

law in connection with any claims, liabilities, or causes of action arising from any Humana contract.

28. Elevance Health, Inc. On the Effective Date, all of the Agreements (as that term is defined in the *Limited Objection of Elevance Health, Inc. to Assumption or Assumption and Assignment of Executory Contracts* [Docket. No. 749] (the "***Elevance Cure Objection***")) and any other agreements between Elevance Health, Inc. or its direct or indirect affiliates and subsidiaries (collectively, "***Elevance***"), on the one hand, and any of the Debtors, on the other hand, for the provision of non-emergency transportation services as may be identified by the Debtors and Elevance in writing prior to the Effective Date (collectively, the "***Elevance Agreements***") shall be assumed by the Debtors. Notwithstanding anything in the Plan or this Confirmation Order to the contrary and in resolution of the Elevance Cure Objection, all obligations owing to either the Debtors or Elevance under the Elevance Agreements shall pass through and survive assumption, and will be paid in the ordinary course of business under the Elevance Agreements. Nothing in the Plan or this Confirmation Order shall affect the rights of recovery, setoff, or recoupment of Elevance or the Debtors under the Elevance Agreements.

29. Missouri Department of Revenue. Notwithstanding anything to the contrary in the Plan or this Confirmation Order, to the extent that the priority tax claims of the Missouri Department of Revenue have not been paid in full prior to the Effective Date, such claims will be paid either (a) in full on the Effective Date or (b) in equal monthly installments commencing on the Effective Date and continuing over a period ending not later than sixty (60) months after the Petition Date. Each equal monthly payment shall in addition include interest at the statutory interest rate of 8% per annum from the Effective Date.

30. Texas Comptroller. Notwithstanding anything else to the contrary in the Plan or this Confirmation Order, the Texas Comptroller of Public Accounts (the "***Texas Comptroller***") reserves the following rights: (a) any statutory or common law setoff rights of the Texas Comptroller in accordance with 11 U.S.C. § 553; (b) any rights of the Texas Comptroller to pursue any non-debtor third parties for tax debts or claims; (c) the payment of interest on the Texas Comptroller's Allowed administrative expense tax claims, if any; (d) subject to any applicable limitation in the Bankruptcy Code, to the extent that interest is payable with respect to any Allowed administrative expense, priority or secured tax claim of the Texas Comptroller, payment of the statutory rate of interest pursuant to Texas Tax Code § 111.060; and (e) the Texas Comptroller is not required to file a motion or application for payment of administrative expense claims pursuant to 11 U.S.C. § 503(b)(1)(D). For the avoidance of doubt, the Texas Comptroller's rights are reserved regarding receiving interest on its Allowed Priority Tax Claims after the Effective Date as required by sections 511 and 1129(a)(9)(C) of the Bankruptcy Code. The Debtors', Reorganized Debtors', and Texas Comptroller's rights and defenses under Texas state law and the Bankruptcy Code with respect to the foregoing are fully preserved. Nothing contained in the Plan or this Confirmation Order will be deemed to be a waiver or relinquishment of, or otherwise affect, any rights, claims, causes of action, rights of setoff or recoupment, rights to appeal tax assessments, or other legal or equitable defenses that any Debtor, Reorganized Debtor, or non-Debtor third party has under non-bankruptcy law in connection with any claim, liability or cause of action of the Texas Comptroller.

31. Texas Taxing Authorities. The Texas Taxing Authorities[4] assert that they are Holders of Claims for ad valorem taxes for tax year 2025 (the "***Texas Taxing Authority Claims***").

[4] "***Texas Taxing Authorities***" are defined to include all ad valorem taxing jurisdictions represented by Perdue Brandon Fielder Collins & Mott LLP, McCreary Veselka Bragg & Allen, P.C., and Linebarger Goggan Blair &

Notwithstanding anything to the contrary in this Confirmation Order or the Plan, the Debtors or Reorganized Debtors shall pay the Texas Taxing Authority Claims in the ordinary course of business on the later of (a) prior to the date the Texas Taxing Authority Claims become due pursuant to the Texas Tax Code (subject to any applicable extensions, grace periods, or similar rights under the Texas Tax Code) and (b) the Effective Date (or as soon as reasonably practicable thereafter). To the extent the Texas Tax Code provides for interest and/or penalties with respect to any portion of the Texas Taxing Authority Claims, nothing in the Plan or this Confirmation Order prevents the inclusion of such interest and/or penalties in the Texas Taxing Authority Claims, and the Debtors' and Reorganized Debtors' defenses and rights to object to such Claims or to the inclusion of such interest or penalties in such Claims on any grounds are fully reserved and preserved. The Texas Taxing Authorities shall retain the liens (if any) that secure any Texas Taxing Authority Claims, in their pre-petition priority (to the extent the Texas Taxing Authorities' liens are valid, senior, perfected, binding, enforceable and non-avoidable), until the taxes due under this Confirmation Order are fully paid. All rights and defenses of the Debtors and the

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Sampson LLP, in connection with the Chapter 11 Cases, including but not limited to the Taxing Districts Collected by Randall County, Taxing Districts Collected by Potter County, Childress County Appraisal District, Gray County Tax Office, Hale County Appraisal District, Hutchinson County, Lubbock Central Appraisal District, Midland County, San Jacinto Community College District, City of Houston, Alief Independent School District, Humble Independent School District, Klein Independent School District, La Porte Independent School District, Pasadena Independent School District, Spring Independent School District, Spring Branch Independent School District, Tomball Independent School District, Brazoria County, Brownsville Independent School District, Frisco ISD, Plano ISD, Wichita County, Dimmit County, Montgomery County Municipal Utility District # 60, Montgomery County Municipal Utility District # 95, Montgomery County Municipal Utility District #119, Magnolia Independent School District, The Woodlands Metro Center Mud, Willis Independent School District, The Woodlands Road Utility District # 1, Central Appraisal District of Taylor County, Reeves County Tax District, The County of Hays, Texas, County of Erath, The County of Denton, Texas, The County of Comal, Texas, Burnet Central Appraisal District, The County of Brazos, Texas, San Marcos CISD, Hays CISD, McLennan County, City of McAllen, Hidalgo County, Cameron County, Nueces County, City of Frisco, Gregg County, Tom Green CAD, Navarro County, City of Allen, Grayson County, Smith County, Stephenville ISD, Lewisville ISD, Allen ISD, Ellis County, City of Stephenville, Parker CAD, Tarrant County, Dallas County, Harris County ESD #09, Houston ISD, City of Houston, Harris County ESD #07, Harris County ESD #11, Harris County ESD #16; Galveston County, Houston Community College System, Fort Bend County, Texas City ISD, Lone Star College System, Cypress-Fairbanks ISD, Jefferson County, Montgomery County, Katy ISD, Bexar County, City of El Paso.

Reorganized Debtors under applicable law are reserved and preserved with respect to such Texas Taxing Authority Claims.

32. The United States. Nothing in this Confirmation Order or the Plan shall effect a release of any claim by the United States Government or any of its agencies or any state and local authority whatsoever, including without limitation any claim arising under the Internal Revenue Code, the environmental laws or any criminal laws of the United States or any state and local authority against any party or person, nor shall anything in this Confirmation Order or the Plan enjoin the United States or any state or local authority from bringing any claim, suit, action, or other proceedings against any party or person for any liability of such persons whatever, including without limitation any claim, suit or action arising under the Internal Revenue Code, the environmental laws or any criminal laws of the United States or any state and local authority against such persons, nor shall anything in this Confirmation Order or the Plan exculpate any party or person from any liability to the United States Government or any of its agencies or any state and local authority whatsoever, including any liabilities arising under the Internal Revenue Code, the environmental laws or any criminal laws of the United States or any state and local authority against any party or person.

VII. Treatment of Executory Contracts and Unexpired Leases

33. The Debtors have exercised sound business judgment in determining whether to reject, assume, or assume and assign each of their Executory Contracts and Unexpired Leases pursuant to sections 365 and 1123(b)(2) of the Bankruptcy Code, Article VIII of the Plan, and as set forth in the Plan Supplement. Except as set forth herein and/or in separate orders entered by the Court relating to the assumption of Executory Contracts or Unexpired Leases, the Debtors have cured or provided adequate assurance that the Debtors will cure defaults (if any) under or relating to each Executory Contract or Unexpired Lease assumed under the Plan and, for each Executory

Contract or Unexpired Lease being assigned under the Plan (if any), such assignee has provided adequate assurance of future performance as required under section 365(f)(2)(B) of the Bankruptcy Code.

34. Assumption (or assumption and assignment) of the Executory Contracts and Unexpired Leases as set forth in Section 8.1(a) of the Plan is hereby authorized. Rejection of the Executory Contracts and Unexpired Leases as set forth in Section 8.1(b) of the Plan and in the Plan Supplement is hereby authorized. Unless an Executory Contract or Unexpired Lease: (a) was previously assumed, assumed and assigned, or rejected by the Debtors by prior order of this Court; (b) is the subject of a motion to reject filed by the Debtors that is pending on the Effective Date; (c) is identified as rejected in the Plan Supplement; (d) is rejected by the Debtors or terminated pursuant to the terms of the Plan, effective as of the Effective Date; or (e) is the subject of a pending Assumption Dispute, such Executory Contract or Unexpired Lease shall be deemed to have been assumed by the applicable Reorganized Debtor, in each case consistent with the Definitive Documents, including the Restructuring Transactions.

35. Unless a party to an Executory Contract or Unexpired Lease being assumed (or assumed and assigned) under the Plan has timely objected to the assumption or assumption and assignment of such Executory Contract or Unexpired Lease and/or the Proposed Cure, the Debtors shall pay such Proposed Cure in accordance with the terms of the Plan and the assumption (or assumption and assignment) of any Executory Contract or Unexpired Lease, pursuant to the Plan or otherwise, shall result in the full release, discharge and satisfaction of any Claims or defaults, whether monetary or nonmonetary, including defaults of provisions restricting the change in control or ownership interest composition or other bankruptcy-related defaults, arising under any assumed Executory Contract or Unexpired Lease at any time prior to the effective date of

assumption and/or assignment and the counterparty to such Executory Contract or Unexpired Lease shall be deemed to have consented to such assumption or assumption and assignment.

36. Notwithstanding anything to the contrary in the Plan, in the event of an Assumption Dispute regarding the amount and timing of any Proposed Cure, the Reorganized Debtors and applicable non-Debtor parties shall promptly confer after the Effective Date to attempt to resolve any such dispute consensually without further order of this Court. Notwithstanding anything to the contrary in the Plan, in the event such Assumption Dispute cannot be resolved consensually by the applicable parties, then the Reorganized Debtors shall, within thirty (30) days after the Effective Date, file a notice of dispute with the Court (and promptly serve such notice on the applicable counter-party) and such dispute shall be set for a status conference at the next scheduled omnibus hearing in the Chapter 11 Cases, with subsequent evidentiary hearings to be established by the Court as and if necessary. The payments, if any, or other actions, if any, that the Court determines the Reorganized Debtors are required to pay or otherwise perform to assume the applicable Executory Contract or Unexpired Lease pursuant to section 365(b)(1) of the Bankruptcy Code shall be promptly paid or undertaken as required by Final Order resolving the applicable dispute. If an objection to the proposed cure amount is sustained by Final Order of this Court, the Reorganized Debtors in their sole option, may elect to reject such Executory Contract or Unexpired Lease in lieu of assuming or assigning it by filing written notice thereof with this Court, and serving such notice on the applicable counter-party, within ten (10) days of the entry of such Final Order.

VI. Standing Motions

37. The Standing Motions are denied in their entirety for the reasons set forth by the Court on record at the Confirmation Hearing. The Court may further supplement its bench decisions on the Standing Motions with a written opinion.

VIII. Miscellaneous

38. Any objections to Claims shall be Filed by no later than the Claims Objection Deadline; *provided that* nothing contained herein or in the Plan shall limit the Reorganized Debtors' right to object to Claims, if any, Filed or amended after the Claims Objection Deadline. Moreover, notwithstanding the expiration of the Claims Objection Deadline, the Debtors or the Reorganized Debtors shall continue to have the right to amend any Claims objections or other objections and to File and prosecute supplemental objections and counterclaims to a Disputed Claim until such Disputed Claim is Allowed.

39. The Plan shall not become effective unless and until all conditions set forth in Section 9.1 of the Plan have been satisfied or waived pursuant to Section 9.3 of the Plan.

40. Pursuant to the Court's ruling on the record, the fourteen (14) day stay of this Confirmation Order imposed under Bankruptcy Rule 3020(e), is modified and the stay is in place through December 16, 2025, and is thereafter waived, and the Debtors are hereby authorized to consummate the Plan and the transactions contemplated thereby immediately upon expiration of the modified stay on December 17, 2025, subject to the satisfaction or waiver of the conditions set forth in Article IX of the Plan. This Confirmation Order is a Final Order and the period in which an appeal thereof must be filed shall commence upon its entry.

41. The provisions of the Plan and this Confirmation Order, including the findings of fact and conclusions of law set forth herein, are non-severable and mutually dependent.

42. To the extent of any inconsistency between this Confirmation Order and the Plan, the terms and conditions of this Confirmation Order shall govern.

Signed: December 15, 2025

Alfredo R Pérez
United States Bankruptcy Judge

Exhibit A

Plan

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
Debtors.[1]	:	(Jointly Administered)

SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES

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Counsel for the Debtors and Debtors in Possession

Dated: December 5, 2025
Houston, Texas

[1] A complete list of each of the Debtors in 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.'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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SECOND AMENDED JOINT CHAPTER 11 PLAN OF
REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES

ModivCare Inc. and each of the other debtors and debtors-in-possession in the above-captioned cases (collectively, the "***Debtors***") jointly propose this Plan for the treatment and resolution of the outstanding Claims against, and Interests in, the Debtors. Capitalized terms used shall have the meanings ascribed to such terms in Article I.A unless defined elsewhere in this Plan.

Other than with respect to Debtor ModivCare Inc., the Plan provides for the substantive consolidation of all of the Debtors solely for the purposes of voting, determining which Class or Classes have accepted the Plan, confirming the Plan, and the resulting treatment of all Claims and Interests and Plan distributions. The Debtors seek to consummate the Restructuring Transactions on the Effective Date. Each Debtor is a proponent of this Plan within the meaning of section 1129 of the Bankruptcy Code.

This Plan shall be deemed a motion to approve the good-faith compromises and settlements of all Claims, Interests, Causes of Action, and controversies pursuant to Bankruptcy Rule 9019.

Reference is made to the Disclosure Statement for a discussion of the Debtors' history, businesses, results of operations, historical financial information, projections, and future operations, as well as a summary and analysis of this Plan and certain related matters, including distributions to be made under this Plan. There also are other agreements and documents, which shall be Filed with the Bankruptcy Court, that are referenced in this Plan, the Plan Supplement, or the Disclosure Statement as exhibits and schedules. All such exhibits and schedules are incorporated into and are a part of this Plan as if set forth in full herein. Subject to certain restrictions and requirements set forth in 11 U.S.C. § 1127, Fed. R. Bankr. P. 3019, and the terms and conditions set forth in the Restructuring Support Agreement and this Plan, the Debtors reserve the right to alter, amend, modify, revoke, or withdraw this Plan before its substantial consummation.

ALL HOLDERS OF CLAIMS ENTITLED TO VOTE ON THIS PLAN ARE ENCOURAGED TO READ THIS PLAN AND THE DISCLOSURE STATEMENT IN THEIR ENTIRETY BEFORE VOTING TO ACCEPT OR REJECT THIS PLAN.

ARTICLE I.

DEFINITIONS AND INTERPRETATION.

A. Definitions.

The following terms shall have the respective meanings specified below:

"***Administrative Claim***" means a Claim for costs and expenses of administration of the Chapter 11 Cases pursuant to sections 503(b), 507(a)(2), 507(b), or 1114(e)(2) of the Bankruptcy Code, including, without limitation: (a) the actual and necessary costs and expenses incurred on or after the Petition Date until and including the Effective Date of preserving the Estates and operating businesses, including fees and expenses Allowed by the Bankruptcy Court as compensation for services rendered or reimbursement of expenses incurred through and including the Effective Date under sections 330, 331, 503(b)(2), 503(b)(3), 503(b)(4), or 503(b)(5) of the Bankruptcy Code; and (b) all fees and charges assessed against the Estates pursuant to section 1930 of chapter 123 of title 28 of the United States Code.

"***Affiliate***" shall, with respect to an Entity, have the meaning set forth in section 101(2) of the Bankruptcy Code as if such Entity were a debtor in a case under the Bankruptcy Code.

"***Allowed***" means, with reference to any Claim or Interest, (a) any Claim or Interest arising on or before the Effective Date that is evidenced by a Proof of Claim or proof of Interest Filed by the applicable Claims Bar Date (i) as to which no objection to allowance, priority, or secured status, and no request for estimation or other challenge, including, without limitation, pursuant to section 502(d) of the Bankruptcy Code or otherwise, has been interposed prior to the Claims Objection Deadline, or (ii) as to which any objection has been determined by a Final Order to the extent such objection is determined in favor of the respective Holder, (b) any Claim or Interest that is compromised, settled, or otherwise resolved pursuant to the authority of the Debtors or Reorganized Debtors, as applicable, (c) any Claim or Interest as to which the liability of the Debtors or Reorganized Debtors, as applicable, and the amount thereof are determined by a Final Order of a court of competent jurisdiction other than the Bankruptcy Court, or (d) any Claim or Interest expressly allowed hereunder; *provided*, *however*, that notwithstanding the foregoing, (x) unless expressly waived by this Plan (including as to the First Lien Claims and the Second Lien Claims), the Allowed amount of Claims or Interests shall be subject to and shall not exceed the limitations under or maximum amounts permitted by the Bankruptcy Code, including sections 502 or 503 of the Bankruptcy Code, to the extent applicable, and (y) the Reorganized Debtors shall retain all claims and defenses with respect to Allowed Claims that are Reinstated or otherwise Unimpaired pursuant to the Plan.

"***Asset***" means all rights, title, and interests of the Debtors or Reorganized Debtors, as applicable, in and to property of whatever type or nature, including real, personal, mixed, intellectual, tangible, and intangible property.

"***Avoidance Action***" means any and all actual or potential avoidance, recovery, subordination, or similar actions or remedies that may be brought by or on behalf of the Debtors or the Estates under the Bankruptcy Code or applicable non-bankruptcy law, including actions or remedies arising under chapter 5 and section 724(a) of the Bankruptcy Code or under similar or related local, state, federal, or foreign statutes and common law, including fraudulent transfer laws, fraudulent conveyance laws, or other similar related laws, in each case whether or not litigation to prosecute such Claim(s) and Cause(s) of Action was commenced prior to the Effective Date.

"***Bankruptcy Code***" means title 11 of the United States Code, 11 U.S.C. § 101, et seq., as amended from time to time, as applicable to the Chapter 11 Cases.

"***Bankruptcy Court***" means the United States Bankruptcy Court for the Southern District of Texas, Houston Division, or such other court having jurisdiction over the Chapter 11 Cases.

"***Bankruptcy Rules***" means the Federal Rules of Bankruptcy Procedure as promulgated by the United States Supreme Court under section 2075 of title 28 of the United States Code and any Local Bankruptcy Rules of the Bankruptcy Court, in each case, as amended from time to time and applicable to the Chapter 11 Cases.

"***Business Day***" means any day, other than a Saturday, Sunday, "legal holiday" (as that term is defined in Bankruptcy Rule 9006(a)), or any other day on which banking institutions in New York, New York are required or authorized by law or executive order to close by law or executive order.

"***Cash***" means cash in legal tender of the United States of America and cash equivalents, including bank deposits, checks, and other similar items.

"***Cash Collateral***" shall have the meaning set forth in the DIP Orders.

"***Causes of Action***" means any action, claim, cross-claim, third-party claim, cause of action, controversy, dispute, proceeding, demand, right, lien, indemnity, contribution, guaranty, suit, obligation, liability, loss, debt, fee or expense, damage, interest, judgment, cost, account, defense, remedy, offset, power, privilege, proceeding, license and franchise of any kind or character whatsoever, known, unknown, foreseen or unforeseen, existing or hereafter arising, contingent or non-contingent, matured or unmatured, suspected or unsuspected, liquidated or unliquidated, Disputed or undisputed, secured or unsecured, assertable directly or derivatively (including any alter ego theories), choate, inchoate, reduced to judgment or otherwise whether arising before, on, or after the Petition Date, in contract or in tort, in law or in equity or pursuant to any other theory of law (including under any state or federal Securities laws). Causes of Action also includes: (a) any right of setoff, counterclaim or recoupment and any claim for breach of contract or for breach of duties imposed by law or in equity; (b) the right to object to Claims or Interests; (c) any claim pursuant to section 362 or chapter 5 of the Bankruptcy Code; (d) any claim or defense including fraud, mistake, duress and usury and any other defenses set forth in section 558 of the Bankruptcy Code; (e) any state law fraudulent transfer claim; and (f) any Avoidance Actions.

"***Chapter 11 Cases***" means (a) when used with reference to a particular Debtor, the case under chapter 11 of the Bankruptcy Code commenced by such Debtor in the Bankruptcy Court, and (b) when used with reference to all Debtors, the jointly administered cases under chapter 11 of the Bankruptcy Code commenced by the Debtors in the Bankruptcy Court.

"***Claim***" means (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured, or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured, each as set forth in section 101(5) of the Bankruptcy Code.

"***Claims Bar Date***" means the applicable deadline by which Proofs of Claim must be Filed under the Claims Bar Date Order.

"***Claims Bar Date Order***" means the *Order Establishing (A) Bar Dates and Related Procedure for Filing Proofs of Claim, (B) Approving the Form and Manner of Notice Thereof, and (C) Granting Related Relief* [Docket No. 66].

"***Claims Objection Deadline***" means the date that is ninety (90) days after the Effective Date; *provided that*, the Claims Objection Deadline is ninety (90) days after the Governmental Bar Date for a Proof of Claim filed by a governmental unit (as defined in section 101(27) of the Bankruptcy Code), which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.

"***Class***" means any group of Claims or Interests classified as set forth in Article III of this Plan pursuant to sections 1122 and 1123(a)(1) of the Bankruptcy Code.

"***Collateral***" means any Asset of an Estate that is subject to a Lien securing the payment or performance of a Claim, which Lien is not invalid and has not been avoided under the Bankruptcy Code or applicable non-bankruptcy law, and any Security as such term is defined in section 101(49) of the Bankruptcy Code.

"***Committee***" means the statutory committee of unsecured creditors appointed in the Chapter 11 Cases pursuant to section 1102 of the Bankruptcy Code by the United States Trustee.

"***Conditions Precedent***" has the meaning set forth in Article IX of this Plan.

"***Confirmation***" means the Bankruptcy Court's entry of the Confirmation Order on the docket of the jointly administered Chapter 11 Cases.

"***Confirmation Date***" means the date upon which Confirmation occurs.

"***Confirmation Hearing***" means the hearing to be held by the Bankruptcy Court pursuant to sections 105(d)(2)(B)(vi) and 1128 of the Bankruptcy Code to consider (a) final approval of the Disclosure Statement under sections 1125 and 1126(b) of the Bankruptcy Code (if not previously approved on a final basis) and (b) Confirmation of this Plan, as such hearing may be adjourned or continued from time to time.

"***Confirmation Order***" means the order of the Bankruptcy Court confirming this Plan pursuant to section 1129 of the Bankruptcy Code, and if not previously approved, approving the Disclosure Statement on a final basis pursuant to section 1125 of the Bankruptcy Code.

"***Consenting Creditors***" means, collectively, the Consenting First Lien Lenders, the Consenting Second Lien Noteholders, and any other person who executes or is required to execute a joinder to the Restructuring Support Agreement in accordance with the terms thereof.

"***Consenting First Lien Lenders***" means the Initial Consenting First Lien Lenders together with any First Lien Lender that subsequently becomes a party to the Restructuring Support Agreement as a "Consenting First Lien Lender" thereunder.

"***Consenting Second Lien Noteholders***" means the Holders of Second Lien Claims that are party to the Restructuring Support Agreement together with any Holder of Second Lien Claims that subsequently becomes a party to the Restructuring Support Agreement as a "Consenting Second Lien Noteholder" thereunder.

"***Corporate Governance Documents***" means, with respect to any Person other than a natural person, the organizational and corporate governance documents for each such Person including limited liability company agreements, operating agreements, certificates of incorporation, certificates of formation, certificates of limited partnership, articles of organization (or equivalent organizational documents), warrant agreements, certificates of designation for preferred stock or other forms of preferred equity, by-

laws, partnership agreements, shareholders' agreements, members' agreement, or equivalent governing documents.

"***Cure Claim***" means a Claim based upon a Debtor's defaults (unless such defaults, or the Claim arising as a result of such defaults, are waived or modified by the applicable counterparty) under an Executory Contract or an Unexpired Lease assumed by such Debtor under section 365 of the Bankruptcy Code, other than a default that is not required to be cured pursuant to section 365(b)(2) of the Bankruptcy Code.

"***D&O Policy***" means, collectively, all insurance policies (including any "tail policy") issued or providing coverage to any of the Debtors for current or former directors', managers', and officers' liability, and all agreements, documents, or instruments related thereto.

"***Debtor***" or "***Debtors***" has the meaning set forth in the introductory paragraph of this Plan.

"***Debtor Release***" means the releases set forth in Article X, Section 10.6(a).

"***Definitive Documents***" means, collectively, all documents and agreements governing the Restructuring Transactions and shall include all documents necessary or reasonably desirable to implement the Restructuring Transactions, including, but not limited to: (a) this Plan and the Plan Supplement; (b) the Disclosure Statement and the Solicitation Packages and exhibits related thereto; (c) the Solicitation Procedures Order; (d) the Confirmation Order; (e) the Exit Facilities Documents; (f) the New Warrants Documents; (g) the New Corporate Governance Documents; (h) the Equity Rights Offering Documents; (i) the DIP Backstop Commitment Letters; (j) the New Common Interests Documents; (k) the DIP Documents; (l) the Restructuring Transaction Steps Memorandum; and (m) any other agreement, document, instrument, material pleading and/or order entered into, or utilized, in connection with or to implement the Restructuring Transaction (together with any exhibit, amendment, modification or supplement thereto), in each case, consistent with the Restructuring Support Agreement.

"***DIP Agent***" means the "Administrative Agent" and the "Collateral Agent" (each, as defined in the DIP Credit Agreement), solely in its capacity as administrative agent and collateral agent under the DIP Credit Agreement, its successors, assigns, or any replacement agent appointed pursuant to the terms of the DIP Credit Agreement.

"***DIP Backstop Commitment Letters***" means those certain backstop commitment letters entered into by the Debtors and the Backstop Parties (as defined in the Restructuring Support Agreement).

"***DIP Backstop Commitment Parties***" means the DIP Backstop Commitment Parties as defined in the DIP Backstop Commitment Letters.

"***DIP Backstop Premium***" means the DIP Backstop Commitment Parties' backstop premium, received by the DIP Backstop Commitment Parties in the allocations set forth in their respective DIP Backstop Commitment Letters, which premium shall be payable on the Effective Date, in full in-kind in the form of New Common Interests equal to 20% of the aggregate New Common Interests, subject to dilution by the MIP, the New Warrants, and the New Common Interests issued pursuant to the Equity Rights Offering.

"***DIP Claims***" means all Claims held by the DIP Lenders or the DIP Agent on account of, arising under, or relating to the DIP Credit Agreement, the DIP Facility, or the DIP Orders, including Claims for all principal amounts outstanding, and any and all fees, interest, expenses, indemnification obligations, reimbursement obligations, and other amounts due under the DIP Documents.

"***DIP Credit Agreement***" means that certain Superpriority Secured Debtor In Possession Credit Agreement dated as of August 22, 2025 and entered into by and among ModivCare, as borrower, the guarantors party thereto, the DIP Agent, and lenders party thereto (as may be amended, restated, amended and restated, supplemented or otherwise modified from time to time in accordance with its terms).

"***DIP Documents***" means the DIP Credit Agreement, the other "Loan Documents" as defined in the DIP Credit Agreement, and the DIP Backstop Commitment Letters, in each case as amended, amended and restated, supplemented or otherwise modified from time to time in accordance with the terms thereof prior to the Effective Date.

"***DIP Facility***" means the debtor-in-possession financing facility provided by the DIP Lenders.

"***DIP Lenders***" means the lenders party to the DIP Credit Agreement from time to time.

"***DIP Loans***" means the loans extended under the DIP Facility.

"***DIP Orders***" means, collectively, the Interim DIP Order and the Final DIP Order.

"***Disclosure Statement***" means the disclosure statement in respect of this Plan, including all exhibits, schedules, supplements, modifications, amendments, annexes and attachments thereto, as approved or ratified by the Bankruptcy Court pursuant to sections 1125 and 1126 of the Bankruptcy Code.

"***Disputed***" means with respect to a Claim: (a) any Claim, which is disputed under Article VII of this Plan or as to which the Debtors have interposed and not withdrawn an objection or request for estimation that has not been determined by a Final Order; (b) any Claim, proof of which was required to be timely and proper but as to which no such Proof of Claim was Filed; (c) any Claim that is listed in the Schedules, if any are Filed, as unliquidated, contingent, or disputed, and as to which no request for payment or Proof of Claim has been Filed; (d) any Claim or Interest that is not yet Allowed, but has not yet been disallowed pursuant to this Plan, the Bankruptcy Code, or a Final Order of the Bankruptcy Court or other court of competent jurisdiction; or (e) any Claim that is otherwise disputed by any of the Debtors or the Reorganized Debtors in accordance with applicable law or contract, which dispute has not been withdrawn, resolved or overruled by a Final Order. To the extent the Debtors dispute only the amount of a Claim, such Claim shall be deemed Allowed in the amount the Debtors do not dispute, if any, and Disputed as to the balance of such Claim.

"***Distribution Agent***" means any Entity (including any applicable Debtor or Reorganized Debtor, as applicable, if it acts in such capacity) in its capacity as a Distribution Agent under Article VI of this Plan.

"***Distribution Record Date***" means the Effective Date, or such other time as designated by the Debtors with the consent of the Required Consenting First Lien Lenders.

"***DTC***" means The Depository Trust Company.

"***Effective Date***" means the date on which (a) no stay of the Confirmation Order is in effect, (b) each of the conditions precedent set forth in Article IX of this Plan have been satisfied or waived in accordance with the terms of Article IX, and (c) the Debtors File a notice declaring the Plan to be effective. Without limiting the foregoing, any action to be taken on the Effective Date may be taken on or as soon as reasonably practicable after the Effective Date.

"***Election Procedures***" means the procedures with respect to the Equity Option (including limitations with respect thereto) to be set forth in the Plan Supplement, in form and substance acceptable to the Required Consenting First Lien Lenders.

"***Eligible Holder***" means a Holder of an Allowed General Unsecured Claim or Allowed Subordinated Unsecured Notes Claim that is an Accredited Investor (as defined in Rule 501 under the Securities Act) or Qualified Institutional Buyer (as defined in Rule 144A under the Securities Act).

"***Employee Plans***" means the employment agreements (including but not limited to offer letters) and severance policies, and all employment, compensation and benefit plans, retention plans, workers' compensation programs, savings plans, retirement plans, deferred compensation plans, healthcare plans, disability plans, severance plans, incentive plans, life and accidental and dismemberment insurance plans, and policies and programs of each of the Debtors applicable to any of its employees and retirees, in each case existing as of the Effective Date.

"***Entity***" means an individual, corporation, partnership, limited liability partnership, limited liability company, association, joint stock company, joint venture, estate, trust, unincorporated organization, government unit (as defined in section 101(27) of the Bankruptcy Code) or any political subdivision thereof, or other person (as defined in section 101(41) of the Bankruptcy Code) or other entity.

"***Equity Option***" has the meaning set forth in Article V, Section 5.15 of this Plan.

"***Equity Rights Offering***" means that certain equity rights offering to be consummated by the Reorganized Parent on the Effective Date in accordance with the Equity Rights Offering Documents, pursuant to which the Reorganized Parent shall issue to certain Eligible Holders of Allowed General Unsecured Claims and Allowed Subordinated Unsecured Notes Claims the right to purchase New Common Interests for an aggregate amount of up to $200,000,000 at a valuation equal to the Equity Rights Offering Valuation, pursuant to applicable exemptions from registration under the Securities Act.

"***Equity Rights Offering Documents***" means, collectively, the agreements, instruments, certificates or other documents memorializing the Equity Rights Offering, as may be amended, restated, supplemented, or otherwise modified from time to time according to their respective terms.

"***Equity Rights Offering Procedures***" means those certain rights offering procedures with respect to the Equity Rights Offering as set forth in the Equity Rights Offering Documents and as approved by the Bankruptcy Court.

"***Equity Rights Offering Valuation***" means a valuation of the New Common Interests such that Holders of First Lien Claims would recover 100% on account of their Allowed First Lien Claims.

"***Estate***" or "***Estates***" means, individually or collectively, the estate or estates of the Debtors created under section 541 of the Bankruptcy Code.

"***Exculpated Parties***" means each of the following in their capacities as such and, in each case, to the maximum extent permitted by law: (a) the Debtors and their Estates; (b) each independent director of the Debtors; and (c) the Committee and each member of the Committee.

"***Exchange Act***" means the Securities Exchange Act of 1934, as amended.

"***Executory Contract***" means a contract to which one or more Debtors is a party that is subject to assumption or rejection under section 365 of the Bankruptcy Code.

"***Existing Parent Equity Interest***" means all issued, unissued, authorized, or outstanding ordinary shares or shares of common stock, preferred stock, other instrument evidencing an ownership interest, and/or any other Interest, in ModivCare, whether or not transferable, together with any warrants, options, equity-based awards, or contractual rights to purchase or acquire such interests at any time and all rights arising with respect thereto that existed immediately before the Effective Date.

"***Exit Facilities***" means, collectively, (a) the Exit Term Loan Facility and (b) the Exit Revolving Facility.

"***Exit Facilities Documents***" means, collectively, (a) the Exit Term Loans Documents and (b) the Exit Revolver Documents.

"***Exit Facility Term Credit Agreement"*** means that certain credit agreement to be entered into in connection with the Exit Term Loan Facility. The Exit Facility Term Credit Agreement shall be dated on or around the Effective Date, by and among Reorganized Parent, as borrower, the administrative agent and collateral agent thereto, and the lenders party thereto.

"***Exit Revolving Facility***" means a revolving credit facility in the principal amount of up to $250,000,000, inclusive of a letter of credit sublimit of up to $150,000,000 (the "***Exit LC Facility***") under the Exit Revolver Credit Agreement, secured by a first priority security interest in and lien on substantially all of the Reorganized Debtors' Assets, subject to customary limitations and exclusions.

"***Exit Revolver Credit Agreement***" means a Revolving Credit Agreement to be entered into by ModivCare, as borrower, and lenders to be determined, on or around the Effective Date, and which shall be for an amount of up to $250,000,000, with a sublimit for letters of credit of up to $150,000,000.

"***Exit Revolver Documents***" means the Exit Revolver Credit Agreement and any other agreement, document and/or instrument entered or entered into in connection with the Exit Revolver Credit Agreement.

"***Exit Term Loan Facility***" means the credit agreement to be entered into by the Reorganized Debtors for a takeback term loan facility with terms and conditions to be set forth in the Plan Supplement.

"***Exit Term Loans***" means the loans under the Exit Term Loan Facility.

"***Exit Term Loans Documents***" means the Exit Facility Term Credit Agreement and any other agreement, document and/or instrument entered into in connection with the Exit Term Loan Facility.

"***File***" or "***Filed***" or "***Filing***" means file, filed, or filing, respectively, with the Bankruptcy Court or its authorized designee in the Chapter 11 Cases.

"***Final DIP Order***" means the order entered by the Bankruptcy Court authorizing the Debtors to enter into the DIP Credit Agreement and approving, among other things, the DIP Facility and the Debtors' use of Cash Collateral, and the parties' rights with respect thereto on a final basis (as may be amended, supplemented or modified from time to time).

"***Final Order***" means as applicable, an order or judgment of the Bankruptcy Court, or other court of competent jurisdiction with respect to the relevant subject matter, which has not been reversed, stayed, modified, or amended, including any order subject to appeal but for which no stay of such order has been entered, and as to which the time to appeal, seek certiorari, or move for a new trial, reargument, or rehearing has expired and as to which no appeal, petition for certiorari, or other proceeding for a new trial, reargument, or rehearing has been timely taken, or as to which any appeal that has been taken or any petition for certiorari

that has been or may be Filed has been withdrawn with prejudice, resolved by the highest court to which the order or judgment was appealed or from which certiorari could be sought, or any request for new trial, reargument, or rehearing has been denied, resulted in no stay pending appeal or modification of such order, or has otherwise been dismissed with prejudice; *provided*, that no order or judgment shall fail to be a "Final Order" solely because of the possibility that a motion under rules 59 or 60 of the Federal Rules of Civil Procedure or any analogous Bankruptcy Rule (or any analogous rules applicable in another court of competent jurisdiction) or sections 502(j) or 1144 of the Bankruptcy Code has been or may be Filed with respect to such order or judgment.

"***First Lien Agent***" means JPMorgan Chase Bank, N.A., as administrative agent under the First Lien Credit Agreement or any successor agent duly appointed under the terms of the First Lien Credit Agreement.

"***First Lien Agent and Consenting Creditor Advisors***" means, collectively, Paul Hastings LLP and Lazard Freres & Co. LLC as, respectively, legal advisor and investment banker, to the First Lien Agent and the Consenting Creditors.

"***First Lien Claims***" means the First Lien Term Loan Claims, the First Lien RCF Claims, and the First Lien Incremental Claims.

"***First Lien Credit Agreement***" means that certain Credit Agreement, dated as of February 3, 2022, as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, including by that certain Amendment No. 5 to the Credit Agreement, dated as of January 9, 2025, by and among ModivCare, the First Lien Lenders and the First Lien Agent comprising the First Lien RCF, the First Lien Incremental, and the First Lien Term Loans.

"***First Lien Credit Documents***" means the First Lien Credit Agreement together with all other related documents, instruments, and agreements, in each case, as supplemented, amended, restated, amended and restated, or otherwise modified from time to time.

"***First Lien Deficiency Claims***" means the portion of the First Lien Credit Agreement that is determined pursuant to section 506(a) of the Bankruptcy Code or similar provision to be unsecured.

"***First Lien Incremental***" means $78,750,000 in unpaid principal amount of term loans, plus accrued and unpaid interest, fees, costs, and expenses due January 2026 under the First Lien Credit Agreement.

"***First Lien Incremental Claim***" means any Claim on account of the First Lien Incremental, including accrued but unpaid interest thereon through the Petition Date.

"***First Lien Lenders***" means those certain lenders party to the First Lien Credit Agreement.

"***First Lien Loans***" means the First Lien RCF, the First Lien Incremental and the First Lien Term Loans.

"***First Lien RCF***" means the $325,000,000 in unpaid principal amount of revolving loans and LC Exposure (as defined in the First Lien Credit Agreement), plus accrued and unpaid interest, fees, costs, and expenses under the First Lien Credit Agreement.

"***First Lien RCF Claims***" means any Claim on account of the First Lien RCF, including accrued but unpaid interest thereon through the Petition Date.

"***First Lien Revolving LC Exposure***" means the LC Exposure comprising the undrawn amount of Letters of Credit which remain undrawn as of the Effective Date under the First Lien Credit Agreement.

"***First Lien Term Loan Claims***" means any Claim on account of the First Lien Term Loans, including accrued but unpaid interest thereon through the Petition Date.

"***First Lien Term Loans***" means $522,239,938 in unpaid principal amount of term loans, plus accrued and unpaid interest, fees, costs, and expenses due July 2031 under the First Lien Credit Agreement.

"***General Unsecured Claim***" means any Second Lien Claim and any prepetition Claim (other than First Lien Deficiency Claims and Subordinated Unsecured Notes Claims) against the Debtors that is not an Administrative Claim, Priority Tax Claim, First Lien Claim, Other Secured Claim, and Other Priority Claim.

"***Governmental Bar Date***" has the meaning set forth in the Claims Bar Date Order.

"***Governmental Unit***" means any supranational, national, state, municipal, local or foreign government, any court, tribunal, arbitrator or arbitral body (public or private), administrative agency, commission or other governmental official, authority or instrumentality (including any legislature, commission, regulatory administrative authority, governmental agency, bureau, branch or department).

"***GUC Cashout Value***" means $32,000,000. The GUC Cashout Value was determined based on the low end of equity value ($400 million) as per the Valuation Analysis attached as Exhibit E to the Disclosure Statement, with respect to both primary equity and the value of the New Warrants.

"***Holder***" means any Person that is the record or beneficial owner of any Claim or Interest, including any nominees, investment managers, investment advisors, sub-advisors, or managers of funds or discretionary accounts that hold, or trustees of trusts that hold, any Claim or Interest.

"***Impaired***" means, with respect to a Claim, Interest, or Class of Claims or Interests, "impaired" within the meaning of section 1124 of the Bankruptcy Code.

"***Indemnification Obligation***" means, collectively, any and all obligations of the Debtors pursuant to their corporate charters, bylaws, limited liability company agreements, memorandum and articles of association, or other organizational documents or agreements to indemnify all current and former officers, directors, agents or employees, in each case solely in their capacity as such, employed by the Debtors on and/or after the Petition Date.

"***Initial Consenting First Lien Lenders***" means those Initial Consenting First Lien Lenders as defined in the Restructuring Support Agreement.

"***Insured Claim***" means any Claim or portion of a Claim that is, or may be, insured under any insured policy.

"***Intercompany Claim***" means any Claim against a Debtor held by another Debtor.

"***Intercompany Interest***" means any Interest in a Debtor held by another Debtor.

"***Interest***" means any equity security (as defined in section 101(16) of the Bankruptcy Code) of the Debtors, including all shares (or any class thereof), common stock, preferred stock, limited liability company interests, membership interests, and any other equity, ownership, or profits interests of any

Debtor, and options, warrants, rights, stock appreciation rights, phantom units, incentives, restricted stock units, commitments, calls, redemption rights, repurchase rights, or other securities or arrangements, whether fully vested or vesting in the future, to acquire or subscribe for, or which are convertible into, or exercisable or exchangeable for the shares (or any class thereof) of, common stock, preferred stock, limited liability company interests, membership interests, or any other equity, ownership, or profits interests of any Debtor (in each case whether or not arising under or in connection with any employment agreement), excluding, for the avoidance of doubt, convertible debt securities.

"***Interim DIP Order***" means the *Interim 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* entered by the Bankruptcy Court at Docket No. 106 in the Chapter 11 Cases.

"***IRS***" means the Internal Revenue Service of the United States of America.

"***Lien***" has the meaning set forth in section 101(37) of the Bankruptcy Code.

"***Local Bankruptcy Rules***" means the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas.

"***Management Incentive Plan***" or "***MIP***" means the management incentive plan to be adopted by the New Board, which plan shall (a) reserve for certain employees, officers and directors of the Reorganized Parent eight percent (8%) of the New Common Interests on a fully-diluted basis, and (b) provide the quantum, form, terms, allocation, and vesting of all awards under the MIP in each case as determined by the New Board.

"***ModivCare***" means ModivCare Inc.

"***New Board***" means the initial composition of the board of directors or managers of Reorganized Parent, which shall consist of members appointed by a pre-emergence committee consisting of the Required Consenting First Lien Lenders who will be the largest holders of New Common Interests, in consultation with the Debtors, and disclosed in the Plan Supplement prior to emergence in accordance with section 1129(a)(5) of the Bankruptcy Code in the Plan Supplement.

"***New Corporate Governance Documents***" means the new Corporate Governance Documents of the Reorganized Debtors after giving effect to the Restructuring Transactions, as applicable, including any shareholders agreement, limited liability company agreement, or similar document.

"***New Common Interests***" means a single class of new common equity interests of Reorganized Parent to be issued (a) on the Effective Date or (b) as otherwise permitted pursuant to this Plan, the New Corporate Governance Documents and the New Common Interests Documents.

"***New Common Interests Documents***" means any and all documents required to implement, issue, or distribute the New Common Interests.

"***New Warrants***" means, collectively, the Series A Warrants, the Series B Warrants, and the Series C Warrants, each as defined in the New Warrants Term Sheet.

"***New Warrants Agreement***" means the form of warrant agreement governing New Warrants.

"***New Warrants Documents***" means the New Warrants, New Warrants Agreement and New Warrants Term Sheet, and any and all documents required to implement, issue, or distribute the New Warrants.

"***New Warrants Term Sheet***" means the term sheet attached as Annex 3 to the Restructuring Term Sheet describing the material terms of New Warrants.

"***Non-Debtor Affiliates***" means the Debtors' Affiliates that are not Debtors.

"***Non-Voting Class***" means each of: Class 1 (Other Secured Claims), Class 2 (Other Priority Claims), Class 6 (Intercompany Claims), Class 7 (Subordinated Claims), Class 8 (Intercompany Interests), and Class 9 (Existing Parent Equity Interests).

"***Other Priority Claim***" means any Claim, other than an Administrative Claim or a Priority Tax Claim, entitled to priority in right of payment under section 507(a) of the Bankruptcy Code.

"***Other Secured Claim***" means any secured claim that is not a First Lien Claim or Second Lien Claim.

"***Person***" means an individual, corporation, partnership, joint venture, association, joint stock company, limited liability company, limited liability partnership, trust, estate, unincorporated organization, Governmental Unit, or other Entity.

"***Petition Date***" means August 20, 2025.

"***Plan***" means this joint chapter 11 plan, including all appendices, exhibits, schedules, and supplements hereto (including any appendices, schedules, and supplements to this Plan contained in the Plan Supplement), as the same may be amended, supplemented, or modified from time to time in accordance with the provisions of the Bankruptcy Code and the terms hereof.

"***Plan Securities***" means, collectively, the New Common Interests, the New Warrants and any other Securities to be distributed and/or issued under this Plan (including any New Common Interests issued or issuable upon or on account of the Management Incentive Plan, the DIP Backstop Premium, the Equity Rights Offering, and/or the exercise of the New Warrants).

"***Plan Supplement***" means any supplemental appendix to this Plan containing certain documents and forms of documents, schedules, and exhibits relevant to the implementation of the Plan, as may be amended modified or supplemented from time to time in accordance with the terms of this Plan, and the Bankruptcy Code and the Bankruptcy Rules, which shall include, but shall not be limited to: (a) the New Corporate Governance Documents; (b) the New Common Interests Documents; (c) the New Warrants Documents; (d) the Exit Facilities Documents; (e) the Equity Rights Offering Documents; (f) the Schedule of Rejected Executory Contracts and Unexpired Leases; (g) any disclosures required under section 1129(a)(5) of the Bankruptcy Code (including, to the extent known and determined, a document disclosing the identity of the directors and officers of the Reorganized Debtors); (h) the Election Procedures; and (i) the Restructuring Transaction Steps Memorandum.

"***Prepetition Funded Debt Documents***" means, collectively, the First Lien Credit Documents, the Second Lien Notes Documents, and the Subordinated Unsecured Notes Indenture.

"***Priority Tax Claim***" means any Claim of a Governmental Unit of the kind specified in section 507(a)(8) of the Bankruptcy Code.

"***Pro Rata Share***" means, except as provided, with respect to any distribution on account of an Allowed Claim, a distribution equal in amount to the ratio (expressed as a percentage) that the amount of such Allowed Claim bears to the aggregate amount of all Allowed Claims in its Class.

"***Professional***" means an Entity: (a) employed pursuant to a Bankruptcy Court order in accordance with sections 327, 363, or 1103 of the Bankruptcy Code and to be compensated for services rendered before or on the Effective Date pursuant to sections 327, 328, 329, 330, 331, or 363 of the Bankruptcy Code; or (b) awarded compensation and reimbursement by the Bankruptcy Court pursuant to section 503(b)(4) of the Bankruptcy Code that are not Restructuring Expenses.

"***Professional Fee Claim***" means all Claims for fees and expenses (including transaction and success fees) incurred by a Professional on or after the Petition Date to the extent such fees and expenses have not been paid pursuant to an order of the Bankruptcy Court.

"***Professional Fee Claims Estimate***" has the meaning set forth in Article II, Section 2.6.

"***Professional Fee Escrow***" means an escrow account established and funded pursuant to Article II, Section 2.5 of this Plan.

"***Proof of Claim***" means a proof of Claim Filed against any of the Debtors in the Chapter 11 Cases.

"***Reinstatement***" or "***Reinstated***" or "***Reinstate***" means, with respect to Claims and Interests, that the Claim or Interest shall be rendered Unimpaired in accordance with section 1124 of the Bankruptcy Code.

"***Related Fund***" means, with respect to any Holder of Allowed Claims, any Affiliates (including at the institutional level) of such Holder or any fund, account (including any separately managed accounts) or investment vehicle that is controlled, managed, advised or sub-advised by such Holder, an Affiliate of such Holder, or by the same investment manager, advisor or subadvisor as such Holder.

"***Related Parties***" means with respect to a Person, that Person's current and former affiliates, and such Person's and its current and former affiliates' current and former directors, managers, officers, equity holders (regardless of whether such interests are held directly or indirectly), affiliated investment funds or investment vehicles, predecessors, participants, successors, and assigns, subsidiaries, and each of their respective current and former equity holders, officers, directors, managers, principals, members, employees, agents, fiduciaries, trustees, advisory board members, financial advisors, limited partners, general partners, attorneys, accountants, managed accounts or funds, management companies, fund advisors, investment bankers, consultants, investment managers, investment advisors, representatives, and other professionals, and such Person's respective heirs, executors, estates, and nominees, each in their capacity as such.

"***Release Opt-Out Form***" means the form to be provided to Holders (other than Debtors or Non-Debtor Affiliates) of Claims and Interests in the Non-Voting Classes through which such Holders may elect to affirmatively opt out of the Third-Party Release.

"***Released Parties***" means, collectively, each of: (a) the Debtors; (b) the Reorganized Debtors; (c) the Consenting Creditors, (d) the First Lien Agent; (e) the DIP Lenders; (f) the DIP Backstop Commitment Parties; (g) the DIP Agent; (h) the Second Lien Notes Trustee; (i) each Holder of a Claim in a Voting Class that does not affirmatively elect to "opt out" of the Third-Party Releases as provided on its respective ballot; (j) each Holder of a Claim or Interest in a Non-Voting Class that does not affirmatively elect to "opt out" of the Third-Party Releases as provided on its respective Release Opt-Out Form; and (k)

with respect to each of the foregoing persons in clauses (a) through (j), each Related Party, solely to the extent such Related Party would be liable whether directly or under principles of agency for any such Claims or Causes of Action asserted against the applicable Entity in the foregoing clauses (a) through (j) to whom they are related. Notwithstanding the foregoing, any Person that opts out of the releases set forth in the Plan shall not be deemed a "Released Party" hereunder; *provided*, that any Holder of a Claim or Interest that timely objects to the Third-Party Release, either through (i) a formal objection Filed on the docket of the Chapter 11 Cases, or (ii) an informal objection provided to the Debtors by electronic mail, and such objection is not withdrawn on the docket of the Chapter 11 Cases or via electronic mail, as applicable, before or at the Confirmation Hearing (and in the case of the latter on the record), shall not be a "Released Party" hereunder; *provided, further*, any Person or Entity (and each such Person or Entity's Related Parties) that files an objection with the Bankruptcy Court to any substantive pleading in the Chapter 11 Cases, including to approval of the DIP Facility or the confirmation of this Plan, or commences any Cause of Action in the Bankruptcy Court or any other court of competent jurisdiction against any director of the Debtors, or against any Consenting Creditor relating to such Consenting Creditor's secured Claims, shall not be a Released Party.

"***Releases***" means, collectively, the releases set forth in Article X, Section 10.6.

"***Releasing Parties***" means, collectively, each of, and in each case in its capacity as such: (a) each Debtor; (b) each Reorganized Debtor; (c) the Consenting Creditors; (d) the First Lien Agent; (e) the DIP Lenders; (f) the DIP Backstop Commitment Parties; (g) the DIP Agent; (h) the Second Lien Notes Trustee; (i) [reserved]; (j) each Holder of a Claim in a Voting Class that does not affirmatively elect to "opt out" of the Third-Party Release as provided on its respective ballot; (k) each Holder of a Claim or Interest in a Non-Voting Class that does not affirmatively elect to "opt out" of the Third-Party Release as provided on its respective Release Opt-Out Form; (l) each Related Party of each Entity in clauses (a) through (k), solely to the extent such Related Party (I) would be obligated to grant a release under principles of agency if it were so directed by the Entity in the foregoing clauses (a) through (k) to whom they are related or (II) may assert Claims or Causes of Action on behalf of or in a derivative capacity by or through an Entity in clause (a) through (i); *provided*, that, any Holder of a Claim or Interest that timely objects to the Third-Party Release, either through (i) a formal objection Filed on the docket of the Chapter 11 Cases or (ii) an informal objection provided to the Debtors by electronic mail, and such objection is not withdrawn on the docket of the Chapter 11 Cases or via electronic mail, as applicable, before the Confirmation Hearing, shall not be a "Releasing Party;" *provided, further,* that the Second Lien Notes Trustee and the First Lien Agent shall be Releasing Parties solely in their respective capacities as Second Lien Notes Trustee and the First Lien Agent and not individually or in any other capacity.

"***Reorganized Debtors***" means a Debtor, or any successor or assign thereto, by merger, consolidation, reorganization, or otherwise, in the form of a corporation, limited liability company, partnership, or other form, as the case may be, on and after the Effective Date, including Reorganized Parent.

"***Reorganized Parent***" means, from and after the Effective Date, ModivCare or such other Entity as may be determined by the Debtors and the Required Consenting First Lien Lenders, to be the Debtors' new corporate parent, as reorganized pursuant to the Plan or as otherwise agreed between the Debtors and the Required Consenting First Lien Lenders.

"***Required Consenting Creditors***" means, collectively, the Required Consenting First Lien Lenders and the Required Consenting Second Lien Noteholders.

"***Required Consenting First Lien Lenders***" means, as of any date of determination, the Consenting First Lien Lenders holding at least 50.1% in aggregate principal amount outstanding of the First Lien Claims held by all of the Consenting First Lien Lenders as of such date.

"***Required Consenting Second Lien Noteholders***" means, as of any date of determination, the Consenting Second Lien Noteholders holding at least 50.1% in aggregate principal amount outstanding of the Second Lien Claims held, beneficially owned, or managed by all of the Consenting Second Lien Noteholders as of such date.

"***Restructuring Expenses***" means (a) all reasonable and documented fees, costs, and expenses of each of the First Lien Agent and Consenting Creditor Advisors, in each case: (i) in connection with the negotiation, formulation, preparation, execution, delivery, implementation, consummation and/or enforcement this Plan, the other Definitive Documents, the Restructuring Transactions, and the transactions contemplated hereby and thereby; and (ii) as otherwise provided under the First Lien Credit Documents, or engagement letters or fee reimbursement letters entered into between the applicable Debtors, on the one hand, and any First Lien Agent and Consenting Creditor Advisor, on the other hand, with respect to the fees, costs, and expenses of any First Lien Agent and Consenting Creditor Advisor and (b) the Second Lien Notes Trustee Fees and Expenses.

"***Restructuring Support Agreement***" means that certain Restructuring Support Agreement, dated as of August 20, 2025, by and among the Debtors and the Consenting Creditors, including all exhibits, annexes, and schedules attached thereto (as may be amended, supplemented or modified, in accordance with the terms thereof, from time to time prior to the date hereof).

"***Restructuring Term Sheet***" means that certain Restructuring Term Sheet attached as Exhibit A to the Restructuring Support Agreement.

"***Restructuring Transaction Steps Memorandum***" means the document setting forth the sequence of certain Restructuring Transactions.

"***Restructuring Transactions***" means the transactions set forth in Article V, Section 5.1.

"***Schedule of Rejected Executory Contracts and Unexpired Leases***" means the schedule of Executory Contracts and Unexpired Leases to be rejected by the Debtors pursuant to this Plan, if any, and to be included in the Plan Supplement, as the same may be amended, modified, or supplemented from time to time.

"***Schedule of Retained Causes of Action***" means a schedule of Causes of Action to be retained by the Reorganized Debtors as set forth in the Plan Supplement.

"***Second Lien Claim***" means any Claim on account of the Second Lien Notes or otherwise arising under the Second Lien Notes Documents, including accrued but unpaid interest, fees, costs and expenses.

"***Second Lien Notes***" means those certain Notes, as defined in and issued pursuant to the Second Lien Notes Indenture.

"***Second Lien Notes Documents***" means the Second Lien Notes Indenture and the Second Lien Notes, together with all other related documents, instruments, notes, certificates, and agreements, in each case, as supplemented, amended, restated, amended and restated, or otherwise modified from time to time.

"***Second Lien Notes Indenture***" means that certain Second Lien Senior Secured PIK Toggle Notes Indenture, dated as of March 7, 2025 by and between ModivCare, the guarantors party thereto from time to time, the Second Lien Notes Trustee and the Notes Collateral Agent (as defined therein), as amended, restated, amended and restated, supplemented or otherwise modified from time to time prior to the Petition Date.

"***Second Lien Notes Trustee***" means Ankura Trust Company, LLC, in its capacity as trustee under the Second Lien Notes Indenture, or any successor trustee duly appointed under the terms of the Second Lien Notes Indenture.

"***Second Lien Notes Trustee Charging Lien***" means any Lien or other priority of payment to which the Second Lien Notes Trustee is entitled under the Second Lien Notes Documents, against distributions to be made to Holders of Second Lien Claims, for payment of any Second Lien Notes Trustee Fees and Expenses.

"***Second Lien Notes Trustee Fees and Expenses***" means all reasonable and documented fees, costs, and expenses of the Second Lien Notes Trustee, arising under or in connection with the Second Lien Notes Documents, including in its capacity as Notes Collateral Agent (as defined in the Second Lien Notes Indenture).

"***Secured Claim***" means a Claim (a) secured by a Lien on Collateral to the extent of the value of such Collateral as (i) set forth in this Plan, (ii) agreed to by the Holder of such Claim and the Debtors, or (iii) determined by a Final Order in accordance with section 506(a) of the Bankruptcy Code exceeds the value of the Claim, or (b) secured by the amount of any right of setoff of the Holder thereof in accordance with section 553 of the Bankruptcy Code; *provided*, that, nothing in this definition shall alter the terms of any subordination pursuant to section 510 of the Bankruptcy Code.

"***Securities Act***" the Securities Act of 1933, as amended.

"***Security***" or "***Securities***" means any instruments that qualify as a "security" under Section 2(a)(1) of the Securities Act.

"***Solicitation Packages***" means materials used in connection with the solicitation of votes on the Plan, including the Disclosure Statement, and any procedures established by the Bankruptcy Court with respect to solicitation of votes on the Plan.

"***Solicitation Procedures Order***" means the order of the Bankruptcy Court approving the Disclosure Statement, solicitation procedures and the Solicitation Packages, and scheduling the Confirmation Hearing.

"***Subordinated Claims***" means any claim subject to subordination under section 510 of the Bankruptcy Code, other than the Subordinated Unsecured Notes Claims. Notwithstanding anything to the contrary outside of this definition in the Plan, any Claim that satisfies the definition of a Subordinated Claim shall be a Subordinated Claim notwithstanding that such Claim would otherwise satisfy the definition of another type of Claim.

"***Subordinated Unsecured Notes***" means those certain 5.000% senior Subordinated Unsecured Notes due October 1, 2029, issued pursuant to the Subordinated Unsecured Notes Indenture.

"***Subordinated Unsecured Notes Claims***" means any Claim on account of the Subordinated Unsecured Notes, including accrued but unpaid interest thereon through the Petition Date.

"***Subordinated Unsecured Notes Indenture***" means that certain that certain Senior Notes Indenture, dated as of August 24, 2021 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time), by and between ModivCare, as issuer, and the Subordinated Unsecured Notes Trustee (defined below) pursuant to which ModivCare issued the Subordinated Unsecured Notes in the aggregate principal amount of $228,835,000.

"***Subordinated Unsecured Notes Subordination Agreement***" Subordination Agreement dated as of March 7, 2025 by and among JP Morgan Chasebank, N.A., Ankura Trust Company LLC and Wilmington Savings Fund Society, FSB pursuant to which, among other things, the Subordinated Unsecured Notes Claims are subordinated in right of payment to the First Lien Term Loan Claims and Second Lien Claims.

"***Subordinated Unsecured Notes Trustee***" means Wilmington Saving Fund Society, FSB (as successor to The Bank of New York Mellon Trust Company, N.A.) or any successor trustee duly appointed under the terms of the Subordinated Unsecured Notes Indenture.

"***Subsequent Condition***" shall have the meaning ascribed to such term in Article IX, Section 9.2 herein.

"***Third-Party Release***" means the releases given by the Releasing Parties to the Released Parties in Article X, Section 10.6(b).

"***Unexpired Lease***" means a lease to which one or more of the Debtors is a party that is subject to assumption or rejection under section 365 of the Bankruptcy Code.

"***Unimpaired***" means, with respect to a Class of Claims or Interests, a Class of Claims or Interests that is unimpaired within the meaning of section 1124 of the Bankruptcy Code.

"***Voting Classes***" means, collectively, Class 3 (First Lien Claims), Class 4 (General Unsecured Claims), and Class 5 (Subordinated Unsecured Notes Claims).

B. Interpretation; Application of Definitions and Rules of Construction.

Unless otherwise specified, all section or exhibit references in this Plan are to the respective section in, or exhibit to, this Plan, as the same may be amended, waived, or modified from time to time. The words "herein," "hereof," "hereto," "hereunder," and other words of similar import refer to this Plan as a whole and not to any particular section, subsection, or clause contained therein and have the same meaning as "in this Plan," "of this Plan," "to this Plan," and "under this Plan," respectively. The words "includes" and "including" are not limiting and shall be deemed to be followed by the words "without limitation." The headings in this Plan are for convenience of reference only and shall not limit or otherwise affect the provisions hereof. For purposes herein: (a) in the appropriate context, each term, whether stated in the singular or plural, shall include both the singular and plural, and pronouns stated in the masculine, feminine, or neuter gender shall include the masculine, feminine, and the neuter gender; (b) any reference herein to a contract, lease, instrument, release, indenture, or other agreement or document being in a particular form or on particular terms and conditions means that the referenced document shall be substantially in that form or substantially on those terms and conditions; (c) unless otherwise specified herein, all references herein to "Articles" are references to Articles hereof or hereto; (d) the rules of construction set forth in section 102 of the Bankruptcy Code shall apply; (e) any term used in capitalized form herein that is not otherwise defined but that is used in the Bankruptcy Code or the Bankruptcy Rules shall have the meaning assigned to that term in the Bankruptcy Code or the Bankruptcy Rules, as the case may be; (f) any docket number references in this Plan shall refer to the docket number of any document Filed with the Bankruptcy Court in the Chapter 11 Cases; (g) references to "shareholders," "directors,"

and/or "officers" shall also include "members" and/or "managers," as applicable, as such terms are defined under the applicable state limited liability company laws; (h) except as otherwise provided herein, any reference to a document or agreement that is to be issued or entered into that is dependent on an election to be made pursuant to this Plan or an event occurring shall be deemed to be followed by the words "if applicable"; (i) any immaterial effectuating provisions may be interpreted by the Debtors, or after the Effective Date, the Reorganized Debtors, in such a manner that is consistent with the overall purpose and intent of this Plan all without further notice to or action, order, or approval of the Bankruptcy Court or any other Entity; *provided*, that any effectuating provision that has an economic impact will not be considered "immaterial"; and (j) except as otherwise provided, any references to the Effective Date shall mean the Effective Date or as soon as reasonably practicable thereafter. To the extent that the treatment, allowance, or disallowance of any Claim herein is interpreted as a Claim objection, this Plan shall be deemed a Claim objection to such Claim.

C. Computation of Time.

Unless otherwise specifically stated herein, the provisions of Bankruptcy Rule 9006(a) shall apply in computing any period of time prescribed or allowed herein. If the date on which a transaction may occur pursuant to this Plan shall occur on a day that is not a Business Day, then such transaction shall instead occur on the next Business Day but shall be deemed to have been completed as of the required date.

D. Reference to Monetary Figures.

All references in this Plan to monetary figures shall refer to the legal tender of the United States of America, unless otherwise expressly provided.

E. Reference to the Debtors or the Reorganized Debtors.

Except as otherwise specifically provided in this Plan to the contrary, references in this Plan to the Debtors or the Reorganized Debtors shall have the meaning ascribed to them in Article I, to the extent the context requires.

F. Controlling Document.

In the event of an inconsistency between this Plan and the Plan Supplement, the terms of the relevant document in the Plan Supplement shall control (unless stated otherwise in such Plan Supplement document or the Confirmation Order). In the event of an inconsistency between this Plan and any other instrument or document created or executed pursuant to this Plan, or between this Plan and the Disclosure Statement, this Plan shall control. The provisions of this Plan and of the Confirmation Order shall be construed in a manner consistent with each other so as to effectuate the purposes of each; *provided*, that if there is determined to be any inconsistency between any Plan provision and any provision of the Confirmation Order that cannot be so reconciled, then, solely to the extent of such inconsistency, the provisions of the Confirmation Order shall govern and any such provision of the Confirmation Order shall be deemed a modification of this Plan.

G. Consultation, Notice, Information and Consent Rights.

Notwithstanding anything herein to the contrary, any and all consultation, information, notice, and consent rights of the parties to the Restructuring Support Agreement, the DIP Documents, as applicable, and as respectively set forth therein and in the DIP Orders, shall be incorporated herein by reference (including to the applicable definitions in Article I.A) and fully enforceable as if stated in full herein. In the case of conflict with respect to consultation, information, notice, and consent rights between the

Restructuring Support Agreement, on the one hand, and the Plan, on the other, the Restructuring Support Agreement shall control and govern.

ARTICLE II.

ADMINISTRATIVE, PRIORITY TAX, DIP CLAIMS, AND PROFESSIONAL FEE CLAIMS

2.1. ***Administrative Claims***.

Except to the extent that a Holder of an Allowed Administrative Claim agrees to different treatment, each Holder of an Allowed Administrative Claim (other than a Professional Fee Claim) shall receive, in full and final satisfaction of such Allowed Administrative Claim, (i) Cash in an amount equal to such Allowed Administrative Claim on the Effective Date or as soon as practicable thereafter or (ii) such other treatment consistent with the provisions of section 1129(a)(9) of the Bankruptcy Code and as agreed to by the Debtors; *provided*, that Allowed Administrative Claims representing liabilities incurred in the ordinary course of business by the Debtors, as debtors in possession (and excluding, for the avoidance of doubt, the DIP Backstop Premium), shall be paid by the Debtors or the Reorganized Debtors, as applicable, in the ordinary course of business, consistent with past practice and in accordance with the terms and subject to the conditions of any orders, course of dealing or agreements governing, instruments evidencing, or other documents relating to such transactions.

2.2. ***Priority Tax Claims***.

Except to the extent that a Holder of an Allowed Priority Tax Claim agrees to less favorable treatment, on the earlier of (a) the Effective Date, to the extent such Claim is an Allowed Priority Tax Claim on the Effective Date, (b) the first Business Day after the date that is thirty (30) calendar days after the date such Priority Tax Claim becomes an Allowed Priority Tax Claim, or (c) the date such Allowed Priority Tax Claim is due and payable in the ordinary course, each Holder of an Allowed Priority Tax Claim shall receive, in full and final satisfaction, settlement, release and discharge of, and in exchange for, such Allowed Priority Tax Claim, at the sole option of the Debtor or the Reorganized Debtors, as applicable, (i) Cash in an amount equal to such Allowed Priority Tax Claim or (ii) treatment consistent with the provisions of section 1129(a)(9) of the Bankruptcy Code; *provided*, that the Debtors and the Reorganized Debtors, as applicable, reserve the right to prepay all or a portion of any such amounts at any time under this option without penalty or premium.

2.3. ***Restructuring Expenses***.

The Restructuring Expenses incurred, or estimated to be incurred up to and including the Effective Date (or, with respect to necessary post-Effective Date activities, after the Effective Date), shall be paid in full in Cash on the Effective Date or as soon as reasonably practicable (to the extent not previously paid during the course of the Chapter 11 Cases, on the dates on which such amounts would be required to be paid under the DIP Orders or the Restructuring Support Agreement, as applicable) in accordance with, and subject to, the terms of the Restructuring Support Agreement, without any requirement to File any Proof of Claim, a fee application with the Bankruptcy Court, a request for payment of Administrative Claim, or any other pleading or document in the Chapter 11 Cases, without the need for itemized time detail, or without any requirement for Bankruptcy Court review or approval. All Restructuring Expenses to be paid on the Effective Date shall be estimated prior to and as of the Effective Date and such estimates shall be delivered to the Debtors at least five (5) calendar days before the anticipated Effective Date; *provided*, that such estimates shall not be considered an admission or limitation with respect to such Restructuring Expenses.

On the Effective Date, or as soon as practicable thereafter, final invoices for all Restructuring Expenses incurred prior to and as of the Effective Date shall be submitted to the Debtors.

If the Debtors or the Reorganized Debtors, as applicable, dispute any requested Second Lien Notes Trustee Fees and Expenses, the Debtors or the Reorganized Debtors, as applicable, shall (1) pay the undisputed portion of the Second Lien Notes Trustee Fees and Expenses and (2) notify the Second Lien Notes Trustee in writing of such dispute within two Business Days after presentment of the invoices by the Second Lien Notes Trustee. Upon such notification, the Second Lien Notes Trustee may assert its Second Lien Notes Trustee Charging Lien to pay the disputed portion of its Second Lien Notes Trustee Fees and Expenses or submit such dispute for resolution by the Bankruptcy Court; *provided*, *however*, that the Bankruptcy Court's review shall be limited to a determination under the reasonableness standard in accordance with the Second Lien Notes Indenture. Nothing herein shall in any way affect or diminish the right of the Second Lien Notes Trustee to exercise its Second Lien Notes Trustee Charging Lien against distributions on account of the Second Lien Claims with respect to any unpaid Second Lien Notes Trustee Fees and Expenses, as applicable.

Payment of the fees and expenses of the First Lien Agent and the Second Lien Notes Trustee as Restructuring Expenses and their inclusion as Released Parties is being provided to each in consideration of the agreement of each of the First Lien Agent and the Second Lien Notes Trustee to waive their respective charging lien rights against distributions under their respective Prepetition Funded Debt Documents.

2.4. ***Professional Fee Claims***.

All Professionals seeking approval by the Bankruptcy Court of Professional Fee Claims shall (i) File, on or before the date that is forty-five (45) days after the Effective Date (unless extended by the Reorganized Debtors), their respective applications for final allowances of compensation for services rendered and reimbursement of expenses incurred and (ii) be paid in full, in Cash, in such amounts as are Allowed by the Bankruptcy Court or authorized to be paid in accordance with the order(s) relating to or allowing any such Professional Fee Claims.

2.5. ***Professional Fee Escrow***.

(a) As soon as reasonably practicable after the Confirmation Date and no later than the Effective Date, the Debtors shall establish and fund the Professional Fee Escrow with Cash equal to the Professional Fee Claims Estimate. No Liens, Claims, or Interests shall encumber the Professional Fee Escrow or Cash held in the Professional Fee Escrow in any way. Subject to the DIP Orders, the Professional Fee Escrow (including funds held in the Professional Fee Escrow) (i) shall not be and shall not be deemed property of the Debtors, their Estates, or the Reorganized Debtors, and (ii) shall be held in trust for the Professionals; *provided*, that funds remaining in the Professional Fee Escrow after all Allowed Professional Fee Claims have been irrevocably paid in full in cash pursuant to one or more Final Orders of the Bankruptcy Court shall revert to the Reorganized Debtors. Allowed Professional Fee Claims shall be paid in Cash to such Professionals from funds held in the Professional Fee Escrow when such Claims are Allowed by an order of the Bankruptcy Court; *provided*, that the Debtors' obligations with respect to Professional Fee Claims shall not be limited nor deemed to be limited in any way to the balance of funds held in the Professional Fee Escrow.

(b) If the amount of funds in the Professional Fee Escrow is insufficient to fund payment in full of all Allowed Professional Fee Claims and any other Allowed amounts owed to Professionals, the deficiency shall be promptly, and, in any event, by no later than five (5) Business Days of the Debtors or the Reorganized Debtors, as applicable, being alerted to such deficiency, funded in Cash

to the Professional Fee Escrow from the Debtors' Estates or Reorganized Debtors, as applicable, without any further action or order of the Bankruptcy Court.

(c) Any objections to Professional Fee Claims shall be served and Filed no later than twenty-one (21) days after Filing of the final applications for compensation or reimbursement.

2.6. ***Professional Fee Claims Estimate***.

Each Professional shall estimate in good faith its unpaid Professional Fee Claim and other unpaid fees and expenses incurred in rendering services to the Debtors, before and as of the Effective Date and shall deliver such reasonable, good faith estimate to the Debtors no later than five (5) Business Days prior to the Effective Date (such estimate the "***Professional Fee Claims Estimate***"); *provided*, that such estimate shall not limit, nor shall it be construed as limiting, the amount of the fees and expenses that are the subject of the Professional's final request for payment of Filed Professional Fee Claims. If a Professional does not provide an estimate, the Debtors shall estimate in good faith the unpaid and unbilled fees and expenses of such Professional. The total aggregate amount so estimated to be outstanding as of the anticipated Effective Date shall be utilized by the Debtors to determine the amount to be funded to the Professional Fee Escrow; *provided*, that the Reorganized Debtors shall use Cash on hand to increase the amount of the Professional Fee Escrow to the extent fee applications are Filed after the Effective Date in excess of the amount held in the Professional Fee Escrow based on such estimates.

2.7. ***DIP Backstop Premium***.

On the Effective Date, the DIP Backstop Premium shall be paid in accordance with the terms of the DIP Backstop Commitment Letters and this Plan.

2.8. ***DIP Claims***.

Notwithstanding anything to the contrary herein and except to the extent that a Holder of an Allowed DIP Claim agrees to less favorable treatment, each Holder of an Allowed DIP Claim shall receive, in full and final satisfaction, settlement, release, and discharge of such Claim, its Pro Rata Share of Exit Term Loans, including, for the avoidance of doubt, DIP Professional Fees and Restructuring Fees and Expenses, which shall be paid in full in cash in accordance with the terms of the DIP Orders and the Plan, as applicable.

2.9. ***Post-Confirmation Date Fees and Expenses***.

(a) Except as otherwise specifically provided in this Plan, on and after the Confirmation Date, the Debtors or Reorganized Debtors, as applicable, may, in the ordinary course of business and without any further notice to or action, order, or approval of the Bankruptcy Court, pay in Cash all reasonable and documented legal, professional, or other fees and expenses related to implementation of this Plan incurred by the Debtors or the Reorganized Debtors, as applicable.

(b) Upon and following the Confirmation Date, any requirement that Professionals comply with sections 327 through 331, 363, and 1103 of the Bankruptcy Code in seeking retention for services rendered after such date shall terminate, and the Debtors or the Reorganized Debtors, as applicable, may employ any Professional in the ordinary course of business without any further notice to or action, order, or approval of the Bankruptcy Court.

ARTICLE III.

CLASSIFICATION OF CLAIMS AND INTERESTS.

3.1. ***Classification in General***.

A Claim or Interest is placed in a particular Class for all purposes, including voting, confirmation, and distribution under this Plan and under sections 1122 and 1123(a)(1) of the Bankruptcy Code; *provided*, that a Claim or Interest is placed in a particular Class for the purpose of receiving distributions pursuant to this Plan only to the extent that such Claim or Interest is an Allowed Claim or Allowed Interest in that Class and such Claim or Interest has not been satisfied, released, or otherwise settled prior to the Effective Date. All of the potential Classes for the Debtors are set forth herein. Certain Debtors may not have any Holders of Claims or Interests in a particular Class or Classes, and such Claims or Interests shall be treated as set forth in Article III, Section 3.5 herein.

In accordance with section 1123(a)(1) of the Bankruptcy Code, the Debtors have not classified Administrative Claims, Priority Tax Claims, and DIP Claims, as described in Article II herein.

Other than with respect to Debtor ModivCare, the Debtors shall be substantively consolidated solely for the purposes of voting, determining which Class or Classes have accepted the Plan, confirming the Plan, and the resulting treatment of all Claims and Interests and Plan distributions.

3.2. ***Formation of Debtor Groups for Convenience Only***.

This Plan groups the Debtors together solely for the purpose of describing treatment under this Plan, confirmation of this Plan, and making distributions in respect of Claims and Interests under this Plan. Such groupings shall not affect any Debtor's status as a separate legal Entity, change the organizational structure of the Debtors' business enterprise, constitute a change of control of any Debtor for any purpose, cause a merger or consolidation of any legal Entities, or cause the transfer of any Assets; and, except as otherwise provided by or permitted under this Plan, all Debtors shall continue to exist as separate legal Entities after the Effective Date.

3.3. ***Summary of Classification***.

The following table designates the Classes of Claims against and Interests in each of the Debtors and specifies which of those Classes are (a) Impaired or Unimpaired by this Plan, (b) entitled to vote to accept or reject this Plan in accordance with section 1126 of the Bankruptcy Code, and (c) presumed to accept or deemed to reject this Plan. In accordance with section 1123(a)(1) of the Bankruptcy Code, Administrative Claims, DIP Claims (including the DIP Backstop Premium), Priority Tax Claims, and

Restructuring Expenses have not been classified. The classification of Claims and Interests set forth herein shall apply separately to each Debtor.

Class	Designation	Treatment	Entitled to Vote
1	Other Secured Claims	Unimpaired	No (Presumed to Accept)
2	Other Priority Claims	Unimpaired	No (Presumed to Accept)
3	First Lien Claims	Impaired	Yes
4	General Unsecured Claims	Impaired	Yes
5	Subordinated Unsecured Notes Claims	Impaired	Yes
6	Intercompany Claims	Unimpaired	No (Presumed to Accept)
7	Subordinated Claims	Impaired	No (Deemed to Reject)
8	Intercompany Interests	Unimpaired	No (Presumed to Accept)
9	Existing Parent Equity Interests	Impaired	No (Deemed to Reject)

3.4. ***Special Provision Governing Unimpaired Claims***.

Except as otherwise provided in this Plan, nothing under this Plan shall affect, diminish, or impair the rights of the Debtors or the Reorganized Debtors, as applicable, in respect of any Unimpaired Claims, including all rights in respect of legal and equitable defenses to, or setoffs or recoupments against, any such Unimpaired Claims; and, except as otherwise specifically provided in this Plan, nothing herein shall be deemed to be a waiver or relinquishment of any Claim, Cause of Action, right of setoff, or other legal or equitable defense that the Debtors had immediately prior to the Petition Date, against or with respect to any Claim that is Unimpaired (including, for the avoidance of doubt, any Claim that is Reinstated) by this Plan. Except as otherwise specifically provided in this Plan, the Reorganized Debtors shall have, retain, reserve, and be entitled to assert all such Claims, Causes of Action, rights of setoff, and other legal or equitable defenses that the Debtors had immediately prior to the Petition Date fully as if the Chapter 11 Cases had not been commenced, and all of the Reorganized Debtors' legal and equitable rights with respect to any Reinstated Claim or Claim that is otherwise Unimpaired by this Plan may be asserted after the Confirmation Date and the Effective Date to the same extent as if the Chapter 11 Cases had not been commenced.

3.5. ***Elimination of Vacant Classes***.

Any Class of Claims or Interests that, as of the commencement of the Confirmation Hearing, does not have at least one Holder of a Claim or Interest that is Allowed, or temporarily Allowed under Bankruptcy Rule 3018, in an amount greater than zero for voting purposes shall be considered vacant,

deemed eliminated from this Plan for purposes of determining acceptance or rejection of this Plan pursuant to section 1129(a)(8) of the Bankruptcy Code with respect to that Class.

3.6. ***No Waiver***.

Nothing contained in this Plan shall be construed to waive a Debtor's or other Person's right to object on any basis to any Disputed Claim.

3.7. ***Voting Classes***.

Classes 3, 4, and 5 are Impaired under this Plan. The Holders of Claims in such Classes as of the Voting Record Date are entitled to vote to accept or reject this Plan.

3.8. ***Presumed Acceptance of this Plan***.

If a Class contains Claims or Interests eligible to vote and no Holders of Claims or Interests eligible to vote in such Class vote to accept or reject this Plan, this Plan shall be presumed accepted by such Class.

Classes 1, 2, 6, and 8 are Unimpaired under this Plan. Therefore, the Holders of Claims or Interests in such Classes are presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code and are not entitled to vote to accept or reject this Plan.

3.9. ***Deemed Rejection of this Plan***.

Classes 7 and 9 are Impaired and Holders of Subordinated Claims and Existing Parent Equity Interests in such Classes shall receive no distribution under this Plan on account of such Claims or Interests, as applicable. Therefore, the Holders of Subordinated Claims and Existing Parent Equity Interests are deemed to have rejected this Plan pursuant to section 1126(g) of the Bankruptcy Code and are not entitled to vote to accept or reject this Plan. Such Holders will, however, receive a Release Opt-Out Form to allow such Holders to affirmatively opt-out of the Third-Party Release.

3.10. ***Confirmation Pursuant to Sections 1129(a)(10) and 1129(b) of the Bankruptcy Code***.

Section 1129(a)(10) of the Bankruptcy Code shall be satisfied for purposes of Confirmation by acceptance of this Plan by any of the Voting Classes. The Debtors shall seek Confirmation of this Plan under section 1129(b) of the Bankruptcy Code with respect to any Impaired Class that does not accept this Plan. The Debtors reserve the right to modify this Plan or any Exhibit or the Plan Supplement in order to satisfy the requirements of section 1129(b) of the Bankruptcy Code, if necessary.

ARTICLE IV.

TREATMENT OF CLAIMS AND INTERESTS.

4.1. ***Other Secured Claims (Class 1)***.

(a) *Classification*: Class 1 consists of Other Secured Claims.

(b) *Treatment*: The legal, equitable, and contractual rights of Holders of Allowed Other Secured Claims are unaltered by this Plan. On or as soon as reasonably practicable after the Effective Date, except to the extent that a Holder of an Allowed Other Secured Claim agrees to less favorable treatment of its Allowed Other Secured Claim, in full and final satisfaction, settlement, release, and

discharge and in exchange for each Allowed Other Secured Claim, at the option of the Debtors (with the consent of the Required Consenting First Lien Lenders) or the Reorganized Debtors, (i) such Holder shall receive payment in full in Cash, payable on the later of the Effective Date and the date that is ten (10) Business Days after the date on which such Other Secured Claim becomes an Allowed Other Secured Claim, in each case, or as soon as reasonably practicable thereafter or (ii) such Holder shall receive such other treatment so as to render such holder's Allowed Other Secured Claim Unimpaired.

(c) *Impairment and Voting*: Class 1 is Unimpaired, and the Holders of Other Secured Claims are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Other Secured Claims are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to such Other Secured Claims. Holders of Other Secured Claims shall be provided a Release Opt-Out Form solely for the purpose of enabling such Holders of Other Secured Claims to affirmatively opt-out of the Third-Party Release.

4.2. ***Other Priority Claims (Class 2)***.

(a) *Classification*: Class 2 consists of Other Priority Claims.

(b) *Treatment*: The legal, equitable, and contractual rights of the Holders of Allowed Other Priority Claims are unaltered by this Plan. On or as soon as reasonably practicable after the Effective Date, except to the extent that a holder of an Allowed Other Priority Claim agrees to less favorable treatment, in full and final satisfaction, settlement, release, and discharge and in exchange for each Allowed Other Priority Claim, each holder of an Allowed Other Priority Claim shall, at the option of the Debtors (with the consent of the Required Consenting First Lien Lenders) or the Reorganized Debtors, (i) be paid in full in Cash or (ii) otherwise receive treatment consistent with the provisions of section 1129(a)(9) of the Bankruptcy Code, payable on the later of the Effective Date and the date that is ten (10) Business Days after the date on which such Other Priority Claim becomes an Allowed Other Priority Claim, in each case, or as soon as reasonably practicable thereafter.

(c) *Impairment and Voting*: Class 2 is Unimpaired, and the Holders of Other Priority Claims are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Other Priority Claims are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to Other Priority Claims. Holders of Other Priority Claims shall be provided a Release Opt-Out Form solely for the purpose of enabling such Holders of Other Priority Claims to affirmatively opt-out of the Third-Party Release.

4.3. ***First Lien Claims (Class 3)***.

(a) *Classification*: Class 3 consists of First Lien Claims.

(b) *Allowance*: The First Lien Claims shall be Allowed in the aggregate principal amount of $871,689,024.49 plus accrued and unpaid interest as of the Petition Date in the amount of $9,271,809.29, plus other fees, costs, and expenses under the First Lien Credit Documents.

(c) *Treatment*: On or as soon as reasonably practicable after the Effective Date, except to the extent that a Holder of an Allowed First Lien Claim agrees to less favorable treatment, in full and final satisfaction settlement, release, and discharge and in exchange for each Allowed First Lien Claim, on the Effective Date or on another date acceptable to the Required Consenting First Lien Lenders, each Holder of an Allowed First Lien Claim shall receive its Pro Rata Share (subject to application of the Equity Option) of the following:

(i) with respect to any First Lien RCF Claims on account of unfunded First Lien Revolving LC Exposure as of the Effective Date, participation in the Exit LC Facility in an amount equal to each such Holder's participation in any such unfunded First Lien Revolving LC Exposure as of the Effective Date;

(ii) with respect to any First Lien Claim other than unfunded First Lien Revolving LC Exposure:

A. the Exit Term Loans;

B. 98% of the New Common Interests, subject to dilution on account of the DIP Backstop Premium, the Equity Rights Offering (if applicable), the New Warrants, and the MIP; and

C. Cash from the proceeds of the Equity Rights Offering, if applicable.

In accordance with the First Lien Credit Agreement, the distributions set forth in subclause 4.3(c)(ii) shall be distributed *first* on account of First Lien Claims consisting of accrued and unpaid interest as of the Petition Date until such amounts received are equal to the full face amount of such accrued and unpaid interest as of the Petition Date and *second* on account of First Lien Claims consisting of principal and any other obligations under the First Lien Credit Agreement. The First Lien Deficiency Claim shall be waived and shall not receive any distribution under this Plan.

(d) *Impairment and Voting*: Class 3 is Impaired, and the Holders of First Lien Claims in Class 3 are entitled to vote to accept or reject this Plan.

4.4. ***General Unsecured Claims (Class 4)***.

(a) *Classification*: Class 4 consists of General Unsecured Claims.

(b) *Allowance*: All Allowed General Unsecured Claims (excluding, for the avoidance of doubt, First Lien Deficiency Claims which are hereby deemed waived as of the Effective Date) including all Second Lien Claims which shall be deemed Allowed in the aggregate principal amount of $316,223,250.00 plus accrued and unpaid interest as of the Petition Date in the amount of $12,209,731.04, plus other fees, costs, and expenses of the Second Lien Notes Trustee and the Notes Collateral Agent (as defined in the Second Lien Notes Indenture) under the Second Lien Notes Documents.

(c) *Treatment*: On or as soon as reasonably practicable after the Effective Date, except to the extent that a Holder of an Allowed General Unsecured Claim agrees to less favorable treatment, in full and final satisfaction settlement, release, and discharge and in exchange for each Allowed General Unsecured Claim, on the Effective Date or on another date acceptable to the Required Consenting First Lien Lenders, each Holder of an Allowed General Unsecured Claim shall receive a Pro Rata Share of the following:

(i) 2% of the New Common Interests, subject to dilution by the DIP Backstop Premium, the Equity Rights Offering (if applicable), the New Warrants, and the MIP;

(ii) the New Warrants; and

(iii) if such Holder is an Eligible Holder, on a pro rata basis with the Holders of Allowed General Unsecured Claims and Holders of Allowed Subordinated Unsecured Notes

Claims, the right to purchase up to $200,000,000, in aggregate, of New Common Interests pursuant to the Equity Rights Offering.

provided, that, each Holder of an Allowed General Unsecured Claim that is less than $1,000,000 may elect to receive, in lieu of the foregoing, its Pro Rata Share (determined pro rata for all Holders of General Unsecured Claims regardless of whether such Holders make such election) of the GUC Cashout Value.

(d) *Impairment and Voting.* Class 4 is Impaired, and the Holders of Allowed General Unsecured Claims are entitled to vote to accept or reject this Plan.

4.5. ***Subordinated Unsecured Notes Claims (Class 5)***.

(a) *Classification*: Class 5 consists of Subordinated Unsecured Notes Claims.

(b) *Treatment*: All Subordinated Unsecured Notes Claims shall be canceled, released, and extinguished as of the Effective Date, and Holders of Allowed Subordinated Unsecured Notes Claims shall not receive or retain any distribution, property, or other value on account of such Subordinated Unsecured Notes Claims; provided, that, Eligible Holders of Subordinated Unsecured Notes Claims shall receive, in full and final satisfaction, settlement, release, and discharge and in exchange for each Subordinated Unsecured Notes Claim, their Pro Rata Share of the right to purchase, on a pro rata basis with the other Holders of Allowed Subordinated Unsecured Notes Claims and the Holders of Allowed General Unsecured Claims, up to $200,000,000, in aggregate, of New Common Interests pursuant to the Equity Rights Offering.

(c) *Impairment and Voting*: Class 5 is Impaired, and the Holders of Subordinated Unsecured Notes Claims are entitled to vote to accept or reject this Plan.

4.6. ***Intercompany Claims (Class 6)***.

(a) *Classification*: Class 6 consists of Intercompany Claims.

(b) *Treatment*: On or as soon as reasonably practicable after the Effective Date, all Intercompany Claims shall be either: (i) Reinstated or (ii) set off, settled, distributed, contributed, merged, canceled, or released, in each case, in the discretion of the Debtors with the consent of the Required Consenting First Lien Lenders.

(c) *Impairment and Voting*: Class 6 is Unimpaired and the Holders of Intercompany Claims in Class 6 are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Intercompany Claims are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to such Intercompany Claims.

4.7. ***Subordinated Claims (Class 7)***.

(a) *Classification*: Class 7 consists of Subordinated Claims.

(b) *Treatment*: Holders of Subordinated Claims are not entitled to receive a recovery or distribution on account of such Subordinated Claim. On the Effective Date, Subordinated Claims shall be canceled, released, extinguished, and of no further force or effect.

(c) *Impairment and Voting*: Class 7 is Impaired and not receiving any distribution under this Plan, and Holders of Subordinated Claims are deemed to have rejected this Plan pursuant to

section 1126(g) of the Bankruptcy Code. Therefore, Holders of Subordinated Claims are not entitled to vote to accept or reject this Plan. Holders of Subordinated Claims shall be provided a Release Opt-Out Form solely for purposes of affirmatively opting out of the Third-Party Release.

4.8. ***Intercompany Interests (Class 8)***.

(a) *Classification*: Class 8 consists of Intercompany Interests.

(b) *Treatment*: On or as soon as reasonably practicable after the Effective Date, all Intercompany Interests shall be, at the option of the Debtors, either: (i) Reinstated for administrative convenience or (ii) set off, settled, distributed, contributed, merged, canceled, or released, in each case, in the discretion of the Debtors or Reorganized Debtors.

(c) *Impairment and Voting*: Class 8 is Unimpaired and the Holders of Intercompany Interests in Class 8 are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Intercompany Interests are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to such Intercompany Interests.

4.9. ***Existing Parent Equity Interests (Class 9).*** Classification: Class 9 consists of Existing Parent Equity Interests.

(b) *Treatment*: Holders of Existing Parent Equity Interests shall not receive or retain any distribution, property, or other value on account of such Existing Parent Equity Interests. On the Effective Date or as soon as reasonably practicable thereafter, all Existing Parent Equity Interests shall be canceled, released, extinguished, and of no further force and effect.

(c) *Impairment and Voting*: Class 9 is Impaired and not receiving any distribution under this Plan, and Holders of Existing Parent Equity Interests are deemed to have rejected this Plan pursuant to section 1126(g) of the Bankruptcy Code. Therefore, Holders of Existing Parent Equity Interests are not entitled to vote to accept or reject this Plan. Holders of Existing Parent Equity Interests shall be provided a Release Opt-Out Form solely for purposes of affirmatively opting out of the Third-Party Release.

ARTICLE V.

MEANS FOR IMPLEMENTATION.

5.1. ***Restructuring Transactions***.

Without limiting any rights and remedies of the Debtors or Reorganized Debtors under this Plan or applicable law, but in all cases subject to the terms and conditions of the Definitive Documents and any consents or approvals thereunder, the entry of the Confirmation Order shall constitute authorization for the Reorganized Debtors to take, or to cause to be taken, together with any other transaction that may be necessary or appropriate to effect any transaction described in the Restructuring Support Agreement, or described in, approved by, contemplated by, or necessary to effectuate this Plan, including: (a) the execution and delivery of any appropriate agreements or other documents of merger, amalgamation, consolidation, restructuring, conversion, disposition, transfer, formation, organization, dissolution, or liquidation containing terms that are consistent with the terms of this Plan, and that satisfy the requirements of applicable law and any other terms to which the applicable Persons may agree, including the documents comprising the Plan Supplement; (b) the execution and delivery of appropriate instruments of transfer, assignment, assumption, or delegation of any Asset, property, right, liability, debt, or obligation on terms consistent with the terms of this Plan and having other terms for which the applicable Persons agree; (c) the

filing of appropriate certificates or articles of incorporation, reincorporation, merger, amalgamation, consolidation, conversion, or dissolution pursuant to applicable state law or the filing of any elections; (d) such other transactions that are required to effectuate the Restructuring Transactions, including any mergers, consolidations, restructurings, conversions, elections, dispositions, transfers, formations, organizations, dissolutions, or liquidations; (e) the execution, delivery, and Filing, if applicable, of the Definitive Documents; (f) the issuance of Plan Securities, all of which shall be authorized and approved in all respects, in each case, without further action being required under applicable law, regulation, order or rule; and (g) all other actions that the applicable Persons determine to be necessary or appropriate, including making filings or recordings that may be required by applicable law (collectively, the "***Restructuring Transactions***").

5.2. ***Compromise and Settlement of Claims, Interests, and Controversies***.

Pursuant to sections 363 and 1123 of the Bankruptcy Code and Bankruptcy Rule 9019, and in consideration for the classification, distribution, releases, and other benefits provided under this Plan, upon the Effective Date, the provisions of this Plan shall constitute an integrated, good faith compromise and settlement of all Claims, Interests, and controversies relating to the contractual, legal, equitable, and subordination rights that a Claim or an Interest Holder may have with respect to any Allowed Claim or Allowed Interest or any distribution to be made on account of such Allowed Claim or Allowed Interest. This Plan shall be deemed a motion to approve the good-faith compromises and settlements of all Claims, Interests, Causes of Action, and controversies pursuant to Bankruptcy Rule 9019. Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval of the compromise or settlement of all such Allowed Claims, Allowed Interests, and controversies under Bankruptcy Rule 9019, as well as a finding by the Bankruptcy Court that such compromises, settlements, and transactions are in the best interests of the Debtors, their Estates, and Holders of Allowed Claims and Allowed Interests, and each such compromise, settlement, and transaction, is fair, equitable, and within the range of reasonableness. Subject to the provisions of this Plan governing distributions, all distributions made to Holders of Allowed Claims and Allowed Interests in any Class are intended to be and shall be final. As consideration for, among other things, the Releases provided pursuant to this Plan, the Consenting Creditors have agreed pursuant to the Restructuring Support Agreement, for the benefit of the Debtors and the Debtors' Estates, to make contributions to enable the implementation of this Plan, such contributions being fundamentally necessary to the implementation of this Plan, and without consideration, including the Releases, the Consenting Creditors would not have agreed to make the contributions reflected herein. The compromises and settlements described herein shall be non-severable from each other and from all other terms of this Plan.

5.3. ***Administrative Consolidation for Voting and Distribution Purposes Only***.

Other than with respect to Debtor ModivCare, this Plan is premised upon the substantive consolidation of the Debtors solely for the purposes of voting, determining which Class or Classes have accepted this Plan, confirming the Plan, and the resulting treatment of all Claims and Interests and Plan distributions. Each Debtor shall continue to maintain its separate corporate existence for all purposes other than the treatment of Claims and Interests under this Plan. On the Effective Date, and except as otherwise expressly provided in this Plan, solely for voting, confirmation, and distribution purposes with respect to each Class of Claims or Interests, other than with respect to Debtor ModivCare: (a) all Claims or Interests in each respective Class shall be deemed merged or consolidated and treated as Claims or Interests against the Debtors on a consolidated basis; (b) each Claim or Interest in each respective Class will be deemed a single Claim against, or Interest in, the consolidated Debtors; (c) any Claim in a given Class based on a guaranty by any Debtor of the obligations of any other Debtor shall be deemed eliminated and extinguished, so that any Claim against any Debtor and any guarantee thereof by any other Debtor, and any joint or several liability of any of the Debtors, shall be deemed to be one obligation of the consolidated Debtors; and (d) each Holder of any Allowed Claim or Interest in a given Class shall be entitled to a single recovery on

account of such Claim or Interest, in accordance with the treatment provided under this Plan for such Class, regardless of whether such Holder filed Proofs of Claim against multiple Debtors or has Claims against multiple Debtors based on the same or similar debt.

Such substantive consolidation is solely for voting, confirmation and distribution purposes with respect to each Class and shall not constitute a transfer of Assets or liabilities between the Debtors for any other purpose.

Moreover, this Plan's treatment shall not affect any subordination provisions set forth in any agreement relating to any Claim or Interest or the ability of the post-Effective Date Debtors or to seek to have any Claim subordinated in accordance with section 510 of the Bankruptcy Code or other applicable law. Pursuant to section 510 of the Bankruptcy Code, the Debtors expressly reserve the right to reclassify any Allowed Claim or Interest in accordance with any contractual, legal, or equitable subordination relating thereto. Except as provided in this Plan, all subordination rights that a Holder of a Claim may have with respect to any distribution to be made pursuant to this Plan shall be discharged and terminated, and all actions related to the enforcement of such subordination rights shall be permanently enjoined.

5.4. ***Continued Corporate Existence; Effectuating Documents; Corporate Action; Restructuring Transactions***.

(a) Except as otherwise provided in this Plan or the Plan Supplement, the Debtors shall continue to exist after the Effective Date as Reorganized Debtors in accordance with the applicable laws of the respective jurisdictions in which they are incorporated or organized and pursuant to the respective Corporate Governance Documents (or other analogous formation, constituent, or Corporate Governance Documents) in effect before the Effective Date or the New Corporate Governance Documents or other applicable Corporate Governance Documents, except to the extent such certificate of incorporation, certificate of formation, bylaws or operating agreement (or other analogous formation, constituent, or Corporate Governance Documents) are amended by this Plan or otherwise, and to the extent any such document is amended, such document is deemed to be amended pursuant to this Plan and requires no further action or approval (other than any requisite filings required under applicable state or federal law).

(b) Notwithstanding anything herein to the contrary, on or about the Effective Date or as soon as reasonably practicable thereafter, the Debtors or the Reorganized Debtors, as applicable, shall take all actions set forth in and contemplated by this Plan, and enter into any transaction, and may take all actions as may be necessary or appropriate to effectuate the transactions described in, approved by, contemplated by, or necessary or appropriate to effectuate this Plan, including the Restructuring Transactions.

(c) Upon the Effective Date, all actions contemplated by this Plan shall be deemed authorized and approved in all respects, including (i) the assumption of Executory Contracts and Unexpired Leases as provided herein; (ii) the selection, or criteria for selection, of managers, directors, or officers for the Reorganized Debtors; (iii) the issuance of the New Common Interests and the New Warrants, and entry into the New Common Interests Documents and the New Warrants Documents; (iv) entry into the Exit Facilities and Exit Facilities Documents, (v) the issuance and/or distribution of the Plan Securities; (vi) implementation of, and performance under, the Management Incentive Plan; (vii) the consummation of the Equity Rights Offering; (viii) entry into the New Corporate Governance Documents; and (ix) all other actions contemplated by this Plan (whether to occur before, on, or after the Effective Date), in each case in accordance with and subject to the terms hereof.

(d) The Confirmation Order shall and shall be deemed to, pursuant to sections 363, 1123, and 1142 of the Bankruptcy Code, authorize and direct parties, as applicable, among other things, to

perform all actions as may be necessary or appropriate to effect any transaction described in, approved by, contemplated by, or necessary to effectuate this Plan, including the Restructuring Transactions.

(e) Each officer, director, or manager of the Debtors is (and each officer, director, or manager of the Reorganized Debtors shall be) authorized and empowered to issue, execute, deliver, File, or record such contracts, Securities, instruments, releases, indentures, and other agreements or documents and take such actions as may be necessary or appropriate to effectuate, implement, and further evidence the terms and conditions of this Plan and the Plan Securities in the name of and on behalf of the Reorganized Debtors, all of which shall be authorized and approved in all respects, in each case, without the need for any approvals, authorization, consents, or any further action required under applicable law, regulation, order, or rule (including any action by the stockholders or directors or managers of the Debtors or the Reorganized Debtors) except for those expressly required pursuant to this Plan.

(f) All matters provided for in this Plan involving the corporate or limited liability company structure of the Debtors or the Reorganized Debtors, and any corporate or limited liability company action required by the Debtors or the Reorganized Debtors in connection with this Plan or the Restructuring Transactions shall be deemed to have occurred and shall be in effect, without any requirement of further action by the directors, managers, or officers of the Debtors or the Reorganized Debtors or by any other stakeholder, and with like effect as though such action had been taken unanimously by the stockholders, directors, managers, or officers, as applicable, of the Debtors or Reorganized Debtors.

5.5. ***New Corporate Governance Documents***.

Subject to Article V, Section 5.4, the Reorganized Debtors shall enter into agreements and amend their Corporate Governance Documents to the extent necessary to implement the terms and provisions of this Plan. Without limiting the generality of the foregoing, as of the Effective Date, each of the Reorganized Debtors shall be governed by the New Corporate Governance Documents applicable to it. On the Effective Date, the Corporate Governance Documents of each of the Reorganized Debtors will be deemed to be modified to prohibit the issuance of non-voting equity Securities, solely to the extent required under section 1123(a)(6) of the Bankruptcy Code. On or immediately before the Effective Date, each Reorganized Debtors shall file its applicable New Corporate Governance Documents, if any, with the applicable Secretary of State and/or other applicable authorities in its jurisdiction of incorporation or formation in accordance with applicable laws of its jurisdiction of incorporation or formation, to the extent required for such New Corporate Governance Documents to become effective.

5.6. ***Intercompany Interests; Corporate Reorganization***.

To the extent Reinstated under this Plan, on the Effective Date, the Intercompany Interests (a) shall be Reinstated for the ultimate benefit of the Holders of Claims that receive Plan Securities under this Plan, and their Holders shall receive no recovery or distribution, and (b) without the need for any further corporate action or approval of any board of directors, board of managers, managers, management, or stockholders of any Debtor or Reorganized Debtor, as applicable, the certificates and all other documents representing the Reinstated Intercompany Interests shall be deemed to be in full force and effect.

5.7. ***Exit Facilities Documents***.

(a) On the Effective Date, the Reorganized Debtors shall be authorized to execute, deliver, and enter into the Exit Facilities Documents without further (i) notice to or order or other approval of the Bankruptcy Court, (ii) act or omission under applicable law, regulation, order, or rule, (iii) vote, consent, authorization, or approval of any Person, or (iv) action by the Holders of Claims or Interests. The Exit Facilities Documents shall constitute legal, valid, binding and authorized joint and several obligations

of the applicable Reorganized Debtors, enforceable in accordance with their respective terms and such obligations shall not be enjoined or subject to discharge, impairment, release, avoidance, recharacterization, or subordination under applicable law, this Plan, or the Confirmation Order. The financial accommodations to be extended pursuant to the Exit Facilities Documents (and other definitive documentation related thereto) are reasonable and are being extended, and shall be deemed to have been extended, in good faith and for legitimate business purposes.

(b) Confirmation of this Plan shall be deemed approval of the Exit Facilities, and the Exit Facilities Documents, all transactions contemplated thereby, and all actions to be taken, undertakings to be made, and obligations to be incurred by the Reorganized Debtors in connection therewith, and authorization of the Reorganized Debtors to enter into, execute, and deliver the Exit Facilities Documents.

(c) On the Effective Date, all Liens and security interests granted pursuant to the applicable Exit Facilities Documents shall be (i) valid, binding, automatically perfected, and enforceable Liens and security interests in the personal and real property described in and subject to such document, with the priorities established in respect thereof under applicable non-bankruptcy law and (ii) not subject to avoidance, recharacterization, or subordination under any applicable law, this Plan, or the Confirmation Order.

(d) The Reorganized Debtors and the Persons granted Liens and security interests under the applicable Exit Facilities Documents are authorized to make all filings and recordings and to obtain all governmental approvals and consents necessary to establish and perfect such Liens and security interests under the provisions of the applicable state, provincial, federal, or other law (whether domestic or foreign) that would be applicable in the absence of this Plan and the Confirmation Order (it being understood that perfection shall occur automatically by virtue of the entry of the Confirmation Order without the need for any filings or recordings) and will thereafter cooperate to make all other filings and recordings that otherwise would be necessary under applicable law to give notice of such Liens and security interests to third parties.

5.8. ***Equity Rights Offering***.

(a) On the Effective Date, the Debtors or the Reorganized Debtors, as applicable, shall cause the Equity Rights Offering to be consummated, pursuant to the Equity Rights Offering Documents and this Plan and subject to the Equity Rights Offering Procedures. The Equity Rights Offering shall have been conducted prior to the Effective Date, and the New Common Interests shall be issued pro rata to the participants in the Equity Rights Offering, pursuant to the Equity Rights Offering Documents and this Plan and subject to the Equity Rights Offering Procedures.

(b) Entry of the Solicitation Procedures Order shall constitute Bankruptcy Court approval of the Equity Rights Offering, the Equity Rights Offering Documents, and all transactions contemplated thereby, and all actions to be taken, undertakings to be made, and obligations to be incurred by the Reorganized Debtors in connection therewith, including the issuance of New Common Interests pursuant thereto and the payment of all fees, indemnities, expenses, and other payments provided for in connection therewith, and authorization of the Reorganized Debtors to enter into and execute any other documents necessary to effectuate the transactions in this Article V, Section 5.8.

(c) The consummation of the Equity Rights Offering is conditioned on the consummation of the other transactions contemplated by this Plan and satisfaction with the applicable conditions specified in the Equity Rights Offering Documents. The New Common Interests sold in the Equity Rights Offering may not be sold, transferred, or assigned, except in the circumstances set forth in the Equity Rights Offering Documents and subject to the transfer provisions, if any, and other applicable

provisions set forth in the Corporate Governance Documents of the applicable issuers. The proceeds of the Equity Rights Offering shall fund Cash payments to Holders of Allowed First Lien Claims.

5.9. ***Exemption from Securities Laws***.

(a) No registration statement shall be filed under the Securities Act, or pursuant to any state securities laws, with respect to the offer, issuance and distribution of the Plan Securities under this Plan, the Equity Rights Offering Documents, the Confirmation Order, or the New Warrants Documents.

(b) The offer, sale, issuance, and distribution of the Plan Securities in exchange for Claims pursuant to Article II, Article III, Article IV and other provisions of this Plan, the Restructuring Transactions, the Confirmation Order, and the New Warrants Documents shall be exempt from, among other things, the registration requirements of Section 5 of the Securities Act and any other applicable United States, state, or local law requiring registration for the offer or sale of a Security pursuant to section 1145(a) of the Bankruptcy Code to the fullest extent permissible.

(c) To the extent any portion of the Plan Securities is not eligible for the exemption of registration provided by section 1145 of the Bankruptcy Code (including any New Common Interests to be issued pursuant to the Equity Rights Offering), the offering, sale, issuance, and distribution of such Plan Securities shall be made in reliance upon Section 4(a)(2) of the Securities Act and/or Regulation D promulgated thereunder and on equivalent state law registration exemptions or, solely to the extent such exemptions are not available, other available exemptions from registration under the Securities Act. Any Plan Securities that are not issued pursuant to section 1145(a) of the Bankruptcy Code will be considered "restricted" Plan Securities, will bear customary legends, and may not be resold except pursuant to an effective registration statement or under an available exemption from the registration requirements of the Securities Act, such as, under certain conditions, the resale provision of Rule 144A, Regulation S, and/or Rule 144 of the Securities Act, subject to, in each case, the transfer provisions, if any, and other applicable provisions set forth in the Corporate Governance Documents of the applicable issuers. Any recipients of the Plan Securities that are Affiliates of Reorganized Parent will receive "control" Plan Securities that will be subject to the "control securities" restrictions of Rule 144 of the Securities Act.

(d) The Reorganized Debtors and Reorganized Parent need not provide any further evidence other than this Plan and the Confirmation Order with respect to the treatment of the Plan Securities under applicable securities laws. The availability of the exemption under section 1145 of the Bankruptcy Code or any other applicable securities laws shall not be a condition to the occurrence of the Effective Date.

5.10. ***New Warrants Agreement***.

On the Effective Date, the Reorganized Debtors and Holders of Allowed General Unsecured Claims shall enter into the New Warrants Agreement and all New Warrants shall be issued and exercisable into New Common Interests, subject to the terms and conditions of the New Warrants Agreement, and shall be subject to dilution by the MIP.

5.11. ***Cancellation of Existing Securities and Agreements***.

Except for the purpose of evidencing a right to a distribution under this Plan and except as otherwise set forth in this Plan, including with respect to Executory Contracts or Unexpired Leases that shall be assumed by the Reorganized Debtors, or any contract, instrument, or other agreement or document created in connection with this Plan, on the Effective Date, all agreements, instruments, notes, certificates, mortgages, security documents, Prepetition Funded Debt Documents, and any other documents evidencing any Claim or Interest (other than Intercompany Claims and Intercompany Interests that are not modified by

this Plan) and any rights of any Holder in respect thereof shall be deemed canceled, discharged, and of no further force or effect, without any further act or action of any person under any applicable agreement, instrument, document, law, regulation, order, or rule, and the obligations of the Debtors thereunder shall be deemed automatically fully satisfied, released, and discharged, and each of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent, and their respective agents, successors and assigns shall each be automatically and fully released and discharged of and from all duties and obligations thereunder. Notwithstanding such cancellation and discharge on the Effective Date and the release of the Second Lien Notes Trustee and the First Lien Agent from their respective duties thereunder, the First Lien Credit Agreement, the Second Lien Notes Indenture, and the Subordinated Unsecured Notes Indenture shall continue in effect solely (a) to the extent necessary to allow the Holders of First Lien Claims, Second Lien Claims, and Subordinated Unsecured Notes Claims to receive distributions under this Plan in accordance therewith; (b) to the extent necessary to allow the Debtors, the Reorganized Debtors, and/or the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent each to make post-Effective Date distributions in accordance with this Plan at the expense of the Reorganized Debtors, subject to their respective rights as Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent under the First Lien Credit Agreement, the Second Lien Notes Indenture, and the Subordinated Unsecured Notes Indenture, as applicable, or take such other action expressly authorized by this Plan on account of Allowed First Lien Claims, Second Lien Claims, and Subordinated Unsecured Notes Claims; (c) to allow the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent to appear in the Chapter 11 Cases or in any proceeding in the Bankruptcy Court or any other court, including to enforce the respective obligations owed to each of them under this Plan and to enforce any respective obligations owed to each of them under this Plan in accordance with the respective Prepetition Funded Debt Documents; (d) to allow the Second Lien Notes Trustee to exercise its Second Lien Notes Trustee Charging Lien against distributions to Holders of Second Lien Claims, as applicable; (e) to preserve all rights, remedies, indemnities, powers, and protections, including rights of enforcement, of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent against any person or entity (including, without limitation, with respect to any indemnification or contribution under the respective Prepetition Funded Debt Documents) or any exculpations of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent, pursuant to and subject to the terms of the respective Prepetition Funded Debt Documents to the extent such rights, remedies, indemnities, powers, and protections are enforceable; and (f) to permit the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent to perform any functions that are necessary to effectuate the foregoing, *provided*, that nothing in the foregoing shall affect the discharge of Claims pursuant to the Bankruptcy Code, the Confirmation Order, or this Plan or result in any liability or expense to the Reorganized Debtors. Nothing contained herein shall be deemed to cancel, terminate, release, or discharge the obligation of the Debtors or any of their counterparties under any Executory Contract or Unexpired Lease to the extent such Executory Contract or Unexpired Lease has been assumed by the Debtors pursuant to a Final Order of the Bankruptcy Court or hereunder. For the avoidance of doubt, the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent shall have no ongoing duties to the Holders of the First Lien Claims, the Second Lien Claims, and the Subordinated Unsecured Notes Claims under any of the canceled and discharged First Lien Credit Agreement, Second Lien Notes Indenture, Subordinated Unsecured Notes Indenture, and Prepetition Funded Debt Documents following the Effective Date other than as expressly set forth in this Plan or Confirmation Order.

5.12. ***Cancellation of Existing Parent Equity Interests and other Interests***.

(a) Except as otherwise specifically provided herein, including pursuant to Article V, Section 5.4(a) of this Plan, all notes, instruments, certificates or other agreement or document evidencing debt of the Debtors, Existing Parent Equity Interests, and other Interests will be canceled and obligations of the Debtors thereunder will be discharged and of no further force or effect, except, where applicable, for

the purpose of allowing the applicable agents and trustees to receive distributions from the Debtors under this Plan and to make any further distributions to the applicable Holders on account of their Claims.

(b) Upon the full payment or other satisfaction of its Allowed Other Secured Claim, or promptly thereafter, any Lien securing any Other Secured Claim shall be deemed released and the Holder of such Allowed Other Secured Claim shall deliver to the Debtors or the Reorganized Debtors, as applicable, any Collateral or other property of a Debtor held by such Holder, together with any termination statements, instruments of satisfaction, or releases of all security interests with respect to its Allowed Other Secured Claim that may be reasonably required to terminate any related financing statements, mortgages, mechanics' or other statutory Liens, or lis pendens, or similar interests or documents.

(c) After the Effective Date and following the (i) distributions to Holders on account of Allowed DIP Claims, Allowed First Lien Claims, and Allowed Second Lien Claims and (ii) payment of the Restructuring Expenses, any Lien securing such Claims shall be deemed released and the Debtors or the Reorganized Debtors may, in their sole discretion, take any action necessary to terminate, cancel, extinguish, and/or evidence the release of any and all mortgages, deeds of trust, Liens, pledges, and other security interests with respect to the DIP Claims, First Lien Claims, and Second Lien Claims, including the preparation and filing, in form, substance, and content of any and all documents necessary to terminate, satisfy, or release any mortgages, deeds of trust, Liens, pledges, and other security interests held by the DIP Agent, the First Lien Agent, the Second Lien Notes Trustee, and Holders of DIP Claims, and First Lien Claims, Second Lien Claims, including UCC-3 termination statements.

5.13. ***Officers and Boards of Directors***.

(a) On the Effective Date, the New Board of the Reorganized Debtors shall be appointed by a pre-emergence committee consisting of certain Holders comprising the Required Consenting First Lien Lenders, in consultation with the Debtors, and disclosed in the Plan Supplement prior to emergence in accordance with section 1129(a)(5) of the Bankruptcy Code. The identity of the New Board members will be disclosed in the Plan Supplement at or prior to the Confirmation Hearing. Except to the extent that an existing director of ModivCare is designated (by the aforementioned pre-emergence committee) to serve on the New Board, the existing directors of ModivCare in their capacities as such, shall be deemed to have resigned or shall otherwise cease to be a director of ModivCare on the Effective Date. Each independent director of the Debtors, in such capacity, shall not have any of his/her respective privileged and confidential documents, communications, or information transferred (or deemed transferred) to the Reorganized Debtors, Reorganized Parent, or any other Entity without such director's prior written consent unless such information constitutes property of the Debtors.

(b) The existing directors of each of ModivCare's subsidiaries shall remain in their current capacities as directors of the applicable Reorganized Debtor until replaced or removed in accordance with the organizational documents of the applicable Reorganized Debtors.

(c) The existing officers of the Debtors as of the Effective Date shall remain in their current capacities as officers of the Reorganized Debtors, subject to their right to resign and the ordinary rights and powers of the New Board to remove or replace them in accordance with the New Corporate Governance Documents and any applicable agreements (including, but not limited to, employment agreements and offer letters) that are assumed pursuant to this Plan.

5.14. ***Management Incentive Plan***.

After the Effective Date, the New Board shall adopt and implement the Management Incentive Plan.

5.15. ***First Lien Claim Equity Option***

Prior to the Effective Date, each Holder of an Allowed First Lien Claim shall have the opportunity to irrevocably elect to receive (subject to the limitations set forth in the Election Procedures) (a) additional New Common Interests in lieu of receiving some or all of their pro rata share Exit Term Loans (the "Equity Option") or (b) additional Exit Term Loans in lieu of receiving some or all of their portion of the New Common Interests. New Common Interests distributed pursuant to the Equity Option shall not reduce the aggregate amount of Exit Term Loans available for distribution. The (a) New Common Interests distributed on account of the Equity Option shall reduce, on a ratable basis and at a ratio to be set forth in the Election Procedures, the amount of New Common Interests issued to each Holder of the Allowed First Lien Claims that elects to receive additional Exit Term Loans (to the extent available) in lieu of its pro rata portion of the New Common Interests and (b) the Exit Term Loans distributed on account of the equity Option shall reduce, on a ratable basis and at a ratio to be set forth in the Election Procedures, the amount of Exit Term Loans issued to each Holder of the Allowed First Lien Claims that elects to receive additional New Common Interests in lieu of its pro rata portion of the Exit Term Loans. Holders shall have the opportunity to make such election pursuant to the Election Procedures.

5.16. ***Issuance of New Common Interests and Deregistration***. On the Effective Date, Reorganized Parent shall issue and deliver or reserve for issuance, as applicable, all of the New Common Interests issuable in accordance with the terms of this Plan and the other Definitive Documents. The issuance and delivery or reservation for issuance, as applicable, of such New Common Interests is authorized without the need for further corporate or other action or any consent or approval of any national securities exchange upon which the New Common Interests may be listed on or immediately following the Effective Date. All of the New Common Interests issuable under this Plan and the other Definitive Documents shall, when issued in accordance with this Plan and/or any other applicable Definitive Documents, be duly authorized, validly issued, fully paid, and non-assessable. Each Holder of New Common Interests shall be deemed, without further notice or action, to have agreed to be bound by the New Corporate Governance Documents, as the same may be amended from time to time following the Effective Date in accordance with their terms. The New Corporate Governance Documents shall be binding on all Entities receiving New Common Interests (and their respective successors and permitted assigns), whether received pursuant to this Plan or otherwise and regardless of whether such Entity executes or delivers a signature page to any New Corporate Governance Document. The issuance and delivery or reservation for issuance, as applicable, of the New Common Interests in accordance with this Plan and the other Definitive Documents are authorized without the need for any further limited liability company or corporate action and without any further action by any Holder of a Claim or Interest.

Reorganized Parent shall not be obligated to effect or maintain any listing of the New Common Interests for trading on any national securities exchange (within the meaning of the Exchange Act) and it has no current intention of maintaining or obtaining such listing. The New Common Interests are expected to be delivered via book-entry transfer by the Distribution Agent in accordance with this Plan and the other Definitive Documents, rather than through the facilities of DTC; however, in the event the New Common Interests are DTC eligible on the Effective Date, delivery thereof may be made via DTC. Upon the Effective Date, after giving effect to the Restructuring Transactions, the New Common Interests shall be that number of shares or membership interests as may be designated in the New Corporate Governance Documents. On and after the Effective Date, transfers of New Common Interests shall be made in accordance with

applicable United States law, United States securities laws (as applicable), and the New Corporate Governance Documents.

As promptly as reasonably practicable following the Effective Date, Reorganized Parent shall take all necessary steps in accordance with and to the extent permitted by the Exchange Act and the Securities Act to terminate the registration of all Securities under the Exchange Act and Securities Act, including to de-register its Existing Parent Equity Interests, and to terminate its reporting obligations under sections 12, 13, and 15(d) of the Exchange Act, including by (a) filing, or causing any applicable national securities exchange to file, a Form 25 with the SEC under the Exchange Act, and (b) filing a Form 15 with the SEC under the Exchange Act.

5.17. ***Effectuating Documents; Further Transactions***.

Before, on, and after the Effective Date, the Debtors, the Reorganized Debtors, and the directors, managers, officers, authorized persons, and members of the boards of directors or managers and directors or managers of the foregoing, are authorized to and may issue, execute, deliver, file, or record such contracts, securities, notes, instruments, certificates, releases, and other agreements or documents and take such actions as may be necessary or appropriate to effectuate, implement, and further evidence the terms and provisions of this Plan, the New Corporate Governance Documents, the Exit Facilities Documents, and any Securities issued pursuant to this Plan in the name of and on behalf of the Reorganized Debtors, without the need for any approvals, authorizations, actions, or consents except for those expressly required pursuant to this Plan.

5.18. ***Authority of Debtors***.

Effective on the Confirmation Date, the Debtors and the Reorganized Debtors, as applicable, shall be empowered and authorized to take or cause to be taken, before the Effective Date, all actions necessary or appropriate to achieve the Effective Date and enable the Reorganized Debtors to implement effectively the provisions of this Plan, the Confirmation Order, the Definitive Documents, and the Restructuring Transactions.

5.19. ***Continuing Effectiveness of Final Orders***.

Payment authorization granted to the Debtors under any prior Final Order entered by the Bankruptcy Court shall continue in effect after the Effective Date. Accordingly, the Debtors or the Reorganized Debtors may pay or otherwise satisfy any Claim to the extent permitted by, and subject to, the applicable Final Order without regard to the treatment that would otherwise be applicable to such Claim under this Plan.

5.20. ***Nonconsensual Confirmation***.

To the extent any Voting Class has not voted to accept this Plan, the Debtors intend to undertake to have the Bankruptcy Court confirm this Plan under section 1129(b) of the Bankruptcy Code as to any Classes that reject or are deemed to reject this Plan.

5.21. ***Closing of the Chapter 11 Cases***.

After an Estate has been fully administered, the Reorganized Debtors shall be authorized, but not directed, to submit one or more motion(s) to the Bankruptcy Court for entry of one or more order(s) that

close and issue final decrees for any of the Chapter 11 Cases, for any Debtor, in each case in accordance with the Bankruptcy Code and the Bankruptcy Rules.

5.22. ***Notice of Effective Date***.

On or as soon as practicable after the Effective Date, the Debtors shall File a notice of the occurrence of the Effective Date with the Bankruptcy Court.

ARTICLE VI.

DISTRIBUTIONS.

6.1. ***Distributions Generally***.

The Distribution Agent shall make all distributions under this Plan to the appropriate Holders of Allowed Claims in accordance with the terms of this Plan, provided that initial Plan distributions shall be made to or at the direction of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent, as applicable, for further distribution in accordance with the Prepetition Funded Debt Documents, respectively.

If and to the extent that there are Disputed Claims, distributions on account of any such Disputed Claims shall be made pursuant to the provisions set forth in Article VII. Except as otherwise provided herein, Holders of Claims shall not be entitled to postpetition interest, dividends, or accruals on the distributions provided for herein, regardless of whether such distributions are delivered on or at any time after the Effective Date.

6.2. ***Special Rules for Distributions to Holders of Disputed Claims***.

Except as otherwise agreed by the relevant parties: (a) no partial payments and no partial distributions shall be made with respect to a Disputed Claim until all such disputes in connection with such Disputed Claim have been resolved by settlement or Final Order; and (b) any Entity that holds both an Allowed Claim and a Disputed Claim shall not receive any distribution on the Allowed Claim unless and until all objections to the Disputed Claim have been resolved by settlement or Final Order or such Claims or Interests have been Allowed or expunged.

6.3. ***Distribution Record Date***.

As of the close of business on the Distribution Record Date, the various transfer registers for each of the Classes of Claims or Interests as maintained by the Debtors or their respective agents, shall be deemed closed, and there shall be no further changes in the record Holders of any of the Claims or Interests. The Debtors or the Reorganized Debtors shall have no obligation to recognize any transfer of the Claims or Interests occurring on or after the Distribution Record Date. In addition, with respect to payment of any Cure Claims or disputes over any Cure Claims, neither the Debtors nor the Distribution Agent shall have any obligation to recognize or deal with any party other than the non-Debtor party to the applicable Executory Contract or Unexpired Lease as of the Distribution Record Date, even if such non-Debtor party has sold, assigned, or otherwise transferred its Cure Claim. Notwithstanding the foregoing, the Distribution Record Date shall not apply to distributions in respect of the Second Lien Notes or any securities deposited with DTC, the Holders of which shall receive distributions, if any, in accordance with the customary

exchange procedures of DTC or this Plan. For the avoidance of doubt, in connection with a distribution through the facilities of DTC (if any), DTC shall be considered a single Holder for purposes of distributions.

6.4. ***Date of Distributions***.

(a) Except as otherwise provided in this Plan (including payments made in the ordinary course of the Debtors' business) or as paid pursuant to a prior Bankruptcy Court order, on the Effective Date or, if a Claim or Interest is not Allowed on the Effective Date, on the date that such Claim or Interest becomes Allowed, or, in each case, as soon as reasonably practicable thereafter, or as otherwise determined in accordance with this Plan and the Confirmation Order, including the treatment provisions of Article IV of this Plan, each Holder of an Allowed Claim shall receive the full amount of the distributions that such Holder of an Allowed Claim is entitled to under this Plan; *provided*, that the Reorganized Debtors may implement periodic distribution dates to the extent they determine them to be appropriate (but subject in all respects to the Definitive Documents); *provided further*, that the Reorganized Debtors may make distributions of Plan Securities following the Effective Date, including to Holders of Disputed Claims that become Allowed Claims; *provided further*, that any Holder participating in the Equity Rights Offering may inform the Distribution Agent pursuant to the Equity Rights Offering Procedures that the distributions in respect of such Holder's Allowed Claims shall be made to one or more of its Affiliates, designees or Related Funds. If and to the extent that there are Disputed Claims, distributions on account of any such Disputed Claims shall be made pursuant to the provisions set forth in Article VII; *provided*, that any Plan Security that is issuable to Holders of Allowed Claims but is withheld from distribution on account of a Holder of a Disputed Claim shall not be issued until such time such Disputed Claim is resolved and the Plan Securities are to be distributed. Except as specifically provided in this Plan, Holders of Allowed Claims shall not be entitled to interest, dividends, or accruals on the distributions provided for in this Plan, regardless of whether such distributions are delivered on or at any time after the Effective Date.

(b) For all purposes associated with distributions under the Plan, all guarantees by any Debtor of the obligations of any other Debtor, as well as any joint and several liability of any Debtor with respect to any other Debtor, shall be deemed eliminated so that any obligation that could otherwise be asserted against more than one Debtor shall result in a single distribution under the Plan; provided, that Claims held by a single entity against different Debtors that are not based on guarantees or joint and several liability shall be entitled to the applicable distribution for each such Claim against each applicable Debtor. Any such Claims shall be released pursuant to Article X of the Plan and shall be subject to all potential objections, defenses, and counterclaims, and to estimation pursuant to section 502(c) of the Bankruptcy Code. For the avoidance of doubt, this shall not affect the obligation of each and every Debtor to pay fees payable pursuant to section 1930(a) of the Judicial Code until such time as a particular Chapter 11 Case is closed, dismissed, or converted, whichever occurs first.

6.5. ***Delivery of Distributions to Holders of the First Lien Loans***.

All distributions with respect to the First Lien Claims shall be made to or at the direction of the First Lien Agent. As a condition precedent to the distributions provided for in this subsection, the Holders of Allowed First Lien Claims shall be deemed to have surrendered their First Lien Loans and all such surrendered First Lien Loans and the related book entry positions and other documents shall be deemed to be canceled in accordance with Article V, Section 5.11 of the Plan as of the Effective Date in exchange for such distributions.

6.6. ***Delivery of Distributions to Holders of the Second Lien Notes***.

All distributions with respect to the Second Lien Notes shall be made to or at the direction of the Second Lien Notes Trustee, and the Second Lien Notes Trustee shall hold or direct such distributions for

the benefit of the Holders of Second Lien Claims in accordance with the Second Lien Notes Indenture. At the expense of the Debtors or the Reorganized Debtors, the Second Lien Notes Trustee shall arrange to deliver such distributions to, or on behalf of, the respective Holders of such Allowed Second Lien Claims (subject to the Second Lien Notes Trustee Charging Lien). The Second Lien Notes Trustee shall not incur any liability whatsoever on account of any distributions under the Plan, except for its own gross negligence or willful misconduct as determined by a final, non-appealable order of a court of competent jurisdiction. As a condition precedent to the distributions provided for in this subsection, the Holders of Allowed Second Lien Claims shall be deemed to have surrendered their Second Lien Notes and other documentation underlying their Allowed Second Lien Claims, and all such surrendered Second Lien Notes and the related book entry positions and other documentation shall be deemed to be canceled in accordance with Article V, Section 5.11 of the Plan as of the Effective Date in exchange for such distributions.

Notwithstanding any policies, practices, or procedures of DTC or any other applicable clearing system, DTC and all other applicable clearing systems shall cooperate with and take all actions reasonably requested by the Second Lien Notes Trustee to facilitate distributions to Holders of Allowed Second Lien Claims without requiring that such distributions be characterized as repayments of principal or interest. The Second Lien Notes Trustee shall not be required to provide indemnification or other security to DTC in connection with any distributions to Holders of Allowed Second Lien Claims through the facilities of DTC. In the event that, notwithstanding the Debtors' good faith efforts, any of the Plan consideration to be distributed to the Holders of Second Lien Claims are not approved to be eligible for distribution through DTC as of the Effective Date of the Plan, then the Debtors and the Second Lien Notes Trustee shall confer regarding a methodology of distribution consistent with the terms of the Second Lien Notes Indenture.

6.7. ***Distribution Agent***.

All distributions under this Plan to Claims other than with respect to the First Lien Loans and the Second Lien Notes shall be made by the applicable Distribution Agent which may be a Debtor, Reorganized Debtor, or such other Entity designated as Distribution Agent pursuant to the Plan Supplement, on or after the Effective Date or as otherwise provided herein. A Distribution Agent shall not be required to give any bond or surety or other Security for the performance of its duties, and all reasonable fees and expenses incurred by such Distribution Agents directly related to distributions hereunder shall be reimbursed by the Reorganized Debtors.

6.8. ***Rights and Powers of Distribution Agent***.

(a) From and after the Effective Date, the Distribution Agent, solely in its capacity as Distribution Agent, shall be exculpated by all Entities, including Holders of Claims against and Interests in the Debtors and other parties in interest, from any and all Claims, Causes of Action, and other assertions of liability arising out of the discharge of the powers and duties conferred upon such Distribution Agent by this Plan or any order of the Bankruptcy Court entered pursuant to or in furtherance of this Plan, or applicable law, except for actions or omissions to act arising out of the gross negligence or willful misconduct, fraud, malpractice, criminal conduct, or *ultra vires* acts of such Distribution Agent. No Holder of a Claim or Interest or other party in interest shall have or pursue any Claim or Cause of Action vested in a Distribution Agent by order of the Bankruptcy Court, pursuant to this Plan, or as deemed by such Distribution Agent to be necessary and proper to implement the provisions hereof.

(b) The Distribution Agent shall be empowered to: (i) take, and otherwise effectuate, all actions and execute all agreements, instruments, and other documents necessary to perform its duties under this Plan; (ii) make all applicable distributions or payments provided for under this Plan; (iii) employ professionals to represent it with respect to its responsibilities; and (iv) exercise such other powers (A) as may be vested in the Distribution Agent by order of the Bankruptcy Court (including any Final Order issued

after the Effective Date) or pursuant to this Plan or (B) as deemed by the Distribution Agent to be necessary and proper to implement the provisions of this Plan.

6.9. ***Expenses of Distribution Agent***.

Except as otherwise ordered by the Bankruptcy Court and subject to the written agreement of the Reorganized Debtors, the reasonable and documented fees and expenses incurred by the Distribution Agent acting in such capacity (including reasonable and documented attorneys' fees and expenses) on or after the Effective Date shall be paid in Cash by the Reorganized Debtors in the ordinary course of business.

6.10. ***No Postpetition Interest***.

Except as otherwise specifically provided for in this Plan, the Confirmation Order, any other Definitive Document, another Final Order of the Bankruptcy Court, or required by applicable bankruptcy law (including, without limitation, as required pursuant to section 506(b) or section 511 of the Bankruptcy Code), postpetition interest shall not accrue or be paid on any Claims, and no Holder of a Claim shall be entitled to interest accruing on such Claim on or after the Petition Date.

6.11. ***Delivery of Distributions***.

Subject to Bankruptcy Rule 9010, all distributions to any Holder of an Allowed Claim shall be made by a Distribution Agent, who shall transmit such distribution to the applicable Holders of Allowed Claims (or to the DIP Agent, Second Lien Notes Trustee, and the First Lien Agent, as applicable, as provided herein in the case of DIP Claims, the First Lien Claims, and the Second Lien Claims, as applicable); *provided*, that any Holder participating in the Equity Rights Offering as of the Distribution Record Date may send a written notice to the Distribution Agent that the distributions in respect of such Holder's Allowed Claims shall be made to one or more of its Affiliates, designees or Related Funds; *provided further*, that such Holder and relevant Affiliate, designee, or Related Fund comply with all applicable withholding and reporting requirements set forth in Article VI, Section 6.22 of this Plan. If a distribution to any Holder is returned as undeliverable, no further distributions shall be made to such Holder unless and until such Distribution Agent is notified in writing of such Holder's then-current address, at which time all currently-due, missed distributions shall be made to such Holder as soon as reasonably practicable thereafter without interest. Nothing herein shall require the Distribution Agent to attempt to locate Holders of undeliverable distributions and, if located, assist such Holders in complying with Article VI, Section 6.22 of this Plan.

6.12. ***Distributions as of Effective Date***.

Distributions to Holders of Disputed Claims that are not Allowed Claims as of the Effective Date, but which later become Allowed Claims shall be deemed to have been made on the Effective Date.

6.13. ***Unclaimed Property***.

One year from the later of (a) the Effective Date and (b) the date that is ten (10) Business Days after the date of a distribution on an Allowed Claim, all distributions payable on account of such Claim that are undeliverable or otherwise unclaimed shall be deemed unclaimed property under section 347(b) of the Bankruptcy Code and shall automatically, without need for need for any further action by or approval of any Person, including, without limitation, the Bankruptcy Court, revert to the Reorganized Debtors or their successors or assigns, and all Claims of any other person (including the Holder of a Claim in the same Class) to such distribution shall be discharged and forever barred. The Reorganized Debtors and the

Distribution Agent shall have no obligation to attempt to locate any Holder of an Allowed Claim other than by reviewing the Debtors' books and records and the Bankruptcy Court's Filings.

6.14. ***Time Bar to Cash Payments***.

Checks issued by the Distribution Agent in respect of Allowed Claims shall be null and void if not negotiated within ninety (90) days after the date of issuance thereof. Thereafter, the amount represented by such voided check shall irrevocably revert to the Reorganized Debtors, and any Claim in respect of such voided check shall be discharged and forever barred, notwithstanding any federal or state escheat laws to the contrary. Requests for reissuance of any check shall be made to the applicable Distribution Agent by the Holder of the Allowed Claim to whom such check was originally issued, prior to the expiration of the ninety (90) day period.

6.15. ***Manner of Payment under Plan***.

Except as otherwise specifically provided in this Plan, at the option of the Debtors or the Reorganized Debtors, as applicable, any Cash payment to be made hereunder may be made by a check or wire transfer or as otherwise required or provided in applicable agreements or customary practices of the Debtors.

6.16. ***Satisfaction of Claims***.

Except as otherwise specifically provided in this Plan, any distributions and deliveries to be made on account of Allowed Claims under this Plan shall be in complete and final satisfaction, release, settlement, and discharge of and exchange for such Allowed Claims.

6.17. ***Fractional Interests***.

No fractional shares of New Common Interests shall be distributed. If any distributions of New Common Interests pursuant to this Plan would result in the issuance of a fractional share of New Common Interests, then the number of shares of New Common Interests to be issued in respect of such distribution will be calculated to one decimal place and rounded up or down to the closest whole share (with a half share or greater rounded up and less than a half share rounded down). The total number of shares of New Common Interests to be distributed in connection with this Plan shall be adjusted as necessary to account for the rounding provided for in this Article VI, Section 6.15. No consideration shall be provided in lieu of fractional shares that are rounded down. Neither the Reorganized Debtors nor the Distribution Agent shall have any obligation to make a distribution that is less than one (1) share of New Common Interests. Fractional shares of New Common Interests that are not distributed in accordance with this section shall be returned to, and the ownership thereof shall vest in, the Reorganized Debtors.

6.18. ***Minimum Cash Distributions***.

The Distribution Agent shall not be required to make any distribution of Cash less than one hundred dollars ($100) to any Holder of an Allowed Claim; *provided*, that if any distribution is not made pursuant to this Article VI, Section 6.18, such distribution shall be added to any subsequent distribution to be made on behalf of the Holder's Allowed Claim.

6.19. ***Setoffs***.

(a) The Debtors and the Reorganized Debtors, or such Entity's designee as instructed by such Debtor or Reorganized Debtor, as applicable, may, but shall not be required to, set off or recoup

against any Claim, and any distribution to be made pursuant to this Plan on account of such Claim, any and all Claims, rights, and Causes of Action of any nature whatsoever that the Debtors or the Reorganized Debtors or their successors may have against the Holder of such Claim pursuant to the Bankruptcy Code or applicable non-bankruptcy law; *provided*, that neither the failure to do so nor the allowance of any Claim hereunder shall constitute a waiver or release by a Debtor or a Reorganized Debtor or its successor of any claims, rights, or Causes of Action that a Debtor or Reorganized Debtor or its successor or assign may possess against the Holder of such Claim.

(b) In no event shall any Holder of Claims be entitled to set off any such Claim against any claim, right, or Cause of Action of the Debtor or Reorganized Debtor, unless (i) the Debtors or the Reorganized Debtors, as applicable, have consented or (ii) such Holder has Filed a motion with the Bankruptcy Court requesting the authority to perform such setoff on or before the Confirmation Date, and notwithstanding any indication in any Proof of Claim or otherwise that such Holder asserts, has, or intends to preserve any right of setoff pursuant to section 553 of the Bankruptcy Code or otherwise. Notwithstanding the foregoing, this paragraph does not create any new rights to setoff or recoupment that did not exist under any applicable law or agreement in existence prior to the Effective Date.

6.20. ***Allocation of Distributions Between Principal and Interest***.

Except as otherwise provided in Section 4.3(c) of this Plan and subject to Article VI, Section 6.10 herein or as otherwise required by law (as reasonably determined by the Reorganized Debtors), distributions with respect to an Allowed Claim shall be allocated first to the principal portion of such Allowed Claim (as determined for United States federal income tax purposes) and, thereafter, to the remaining portion of such Allowed Claim, if any.

6.21. ***No Distribution in Excess of Amount of Allowed Claim***.

Notwithstanding anything in this Plan to the contrary, no Holder of an Allowed Claim shall receive, on account of such Allowed Claim, distributions in excess of the Allowed amount of such Claim.

6.22. ***Compliance with Tax Requirements***.

(a) In connection with this Plan and all distributions hereunder, the Reorganized Debtors or other applicable Distribution Agent shall comply with all applicable withholding and reporting requirements imposed by any Governmental Unit, and all distributions hereunder and all related agreements shall be subject to any such withholding and reporting requirements. The Reorganized Debtors or other applicable Distribution Agent shall have the right, but not the obligation, to take any and all actions that may be necessary or appropriate to comply with such applicable withholding and reporting requirements, including (i) withholding distributions and amounts therefrom pending receipt of information necessary to facilitate such distributions, including properly executed withholding certification forms, and (ii) in the case of a non-Cash distribution that is subject to withholding, withholding an appropriate portion of such property and either liquidating such withheld property to generate sufficient funds to pay applicable withholding taxes (or reimburse the distributing party for any advance payment of the withholding tax) or pay the withholding tax using its own funds and retain such withheld property. Notwithstanding any provision in this Plan to the contrary, all Persons holding Claims or Interests shall be required to provide any information necessary to effect information reporting and the withholding of any taxes (or establish eligibility for an exclusion therefrom), and each Holder of an Allowed Claim or an Allowed Interest will have the sole and exclusive responsibility for the satisfaction and payment of any tax obligations imposed by any Governmental Unit, including income, withholding, and other tax obligations, on account of such

distribution. Any amounts withheld or reallocated pursuant to this Article VI, Section 6.22 shall be treated as if distributed to the Holder of the Allowed Claim or Allowed Interest.

(b) Any Person or Entity entitled to receive any property as an issuance, distribution or otherwise under this Plan shall, upon request, deliver to the applicable Reorganized Debtor or other applicable Distribution Agent, or such other Person designated by the Reorganized Debtor or the Distribution Agent, an IRS Form W-9 or, if the payee is a foreign Person or Entity, the applicable version of IRS Form W-8, or any other forms or documents reasonably requested by a Reorganized Debtor or Distribution Agent to reduce or eliminate any withholding required by any applicable Governmental Unit.

ARTICLE VII.

PROCEDURES FOR RESOLVING DISPUTED CLAIMS

7.1. ***Allowance and Disallowance of Claims***.

(a) After the Effective Date, and except as otherwise provided in this Plan, the Reorganized Debtors shall have and shall retain any and all available rights and defenses that the Debtors had with respect to any Claim immediately before the Effective Date, including the right to assert any objection to Claims based on the limitations imposed by section 502 of the Bankruptcy Code. The Debtors and the Reorganized Debtors may, but are not required to, contest the amount and validity of any Disputed Claim or contingent or unliquidated Claim in the ordinary course of business in the manner and venue in which such Claim would have been determined, resolved or adjudicated if the Chapter 11 Cases had not been commenced.

(b) All Claims and Interests of any Entity from which property is sought by the Debtors under sections 542, 543, 550, or 553 of the Bankruptcy Code or that the Debtors or the Reorganized Debtors allege is a transferee of a transfer that is avoidable under sections 522(f), 522(h), 544, 545, 547, 548, 549, or 724(a) of the Bankruptcy Code shall be disallowed if: (i) the Entity, on the one hand, and the Debtors or the Reorganized Debtors, as applicable, on the other hand, agree or the Bankruptcy Court has determined by Final Order that such Entity or transferee is liable to turn over any property or monies under any of the aforementioned sections of the Bankruptcy Code; and (ii) such Entity or transferee has failed to turn over such property by the date set forth in such agreement or Final Order.

7.2. ***Claims Administration Responsibilities***.

Except as otherwise specifically provided in this Plan, after the Effective Date, the Reorganized Debtors shall have the authority: (i) to File, withdraw, or litigate to judgment, objections to Claims or Interests; (ii) to settle or compromise any Disputed Claim or Interest without any further notice to or action, order, or approval by the Bankruptcy Court; and (iii) to administer and adjust the Claims Register to reflect any such settlements or compromises without any further notice to or action, order, or approval by the Bankruptcy Court. For the avoidance of doubt, except as otherwise provided herein, from and after the Effective Date, each Reorganized Debtor shall have and retain any and all rights and defenses such Debtor had immediately before the Effective Date with respect to any Disputed Claim or Interest, including the Causes of Action retained pursuant to this Plan.

7.3. ***Adjustment to Claims or Interests Without Objection***.

Any duplicate Claim or Interest or any Claim or Interest that has been paid, satisfied, amended, or superseded may be adjusted or expunged on the claims register by the Reorganized Debtors without the Reorganized Debtors having to File an application, motion, complaint, objection, or any other

legal proceeding seeking to object to such Claim or Interest and without any further notice to or action, order, or approval of the Bankruptcy Court.

7.4. ***No Distributions Pending Allowance***.

If any portion of a Claim is Disputed, no payment or distribution provided hereunder may be made on account of such Claim unless and until such Claim becomes an Allowed Claim; *provided* that if only a portion of a Claim is Disputed, such Claim may be deemed Allowed in the amount not Disputed and payment or distribution shall be made on account of such undisputed amount.

7.5. ***Distributions After Allowance***.

To the extent that a Disputed Claim ultimately becomes an Allowed Claim, distributions (if any) shall be made to the Holder of such Allowed Claim in accordance with the provisions of this Plan. As soon as reasonably practicable after the date that the order or judgment of the Bankruptcy Court allowing any Disputed Claim becomes a Final Order, the Reorganized Debtors shall provide to the Holder of such Claim the distribution (if any) to which such Holder is entitled under this Plan as of the Effective Date, without any postpetition interest to be paid on account of such Claim.

7.6. ***Claim Resolution Procedures Cumulative***.

All of the Claims, objection, estimation, and resolution procedures in this Plan are intended to be cumulative and not exclusive of one another. Claims may be estimated and subsequently settled, compromised, withdrawn, or resolved in accordance with this Plan without further notice or Bankruptcy Court approval.

ARTICLE VIII.

TREATMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES.

8.1. ***Assumption or Rejection of Executory Contracts and Unexpired Leases***.

(a) On the Effective Date, all Executory Contracts and Unexpired Leases of the Debtors, including, but not limited to, employee contracts and offer letters (other than any individual employee contract or offer letter for which the parties separately agree to different treatment), which have not expired by their own terms on or prior to the Confirmation Date, shall be deemed assumed by the Debtors in accordance with, and subject to, the provisions and requirements of sections 365 and 1123 of the Bankruptcy Code, except for those Executory Contracts and Unexpired Leases that, in each case:

(i) have been assumed, assumed and assigned, or rejected by the Debtors by prior order of the Bankruptcy Court;

(ii) are the subject of a motion to reject Filed by the Debtors pending on the Effective Date;

(iii) are identified as rejected Executory Contracts and Unexpired Leases by the Debtors on the Schedule of Rejected Executory Contracts and Unexpired Leases to be Filed in the Plan Supplement, which may be amended by the Debtors up to and through the Effective Date to add or remove Executory Contracts and Unexpired Leases by Filing with the Bankruptcy Court a subsequent Plan Supplement and serving it on the affected non-Debtor contract parties;

(iv) are rejected or terminated pursuant to the terms of this Plan; or

(v) are the subject of a pending Cure Dispute.

(b) Without amending or altering any prior order of the Bankruptcy Court approving the assumption or rejection of any Executory Contract or Unexpired Lease, the Confirmation Order shall constitute an order of the Bankruptcy Court approving such assumptions, assumptions and assignments, and the rejection of Executory Contracts and Unexpired Leases set forth in the Schedule of Rejected Executory Contracts and Unexpired Leases provided for in this Plan pursuant to sections 365 and 1123 of the Bankruptcy Code as of the Effective Date.

(c) To the extent any provision in any Executory Contract or Unexpired Lease assumed or assumed and assigned (as applicable) pursuant to this Plan or any prior order of the Bankruptcy Court (including, without limitation, any "change in control" provision, "change of control" provision, or provision with words of similar import) prohibits, restricts or conditions, or purports to prohibit, restrict or condition, or is modified, breached or terminated, or deemed modified, breached or terminated by, (i) the commencement of the Chapter 11 Cases or the insolvency or financial condition of any Debtor at any time before the closing of its respective Chapter 11 Case, (ii) any Debtor's or any Reorganized Debtor's assumption or assumption and assignment (as applicable) of such Executory Contract or Unexpired Lease or (iii) the Confirmation or consummation of this Plan, then such provision shall be deemed modified such that the transactions contemplated by this Plan shall not entitle the non-Debtor party thereto to modify or terminate such Executory Contract or Unexpired Lease or to exercise any other default-related rights or remedies with respect thereto, and any required consent under any such contract or lease shall be deemed satisfied by the Confirmation of this Plan.

(d) Each Executory Contract and Unexpired Lease assumed and/or assigned pursuant to this Plan shall revest in and be fully enforceable by the applicable Reorganized Debtor or the applicable assignee in accordance with its terms and conditions, except as modified by the provisions of this Plan, any order of the Bankruptcy Court approving its assumption and/or assignment, or applicable law.

(e) The Debtors reserve the right, on or before the Effective Date, to amend the Schedule of Rejected Executory Contracts and Unexpired Leases and/or to add or remove any Executory Contract and Unexpired Lease; *provided*, the Debtors or Reorganized Debtors, as applicable, may (with the prior written consent of the Required Consenting First Lien Lenders) amend the Schedule of Rejected Executory Contracts or Unexpired Leases to add or delete any Executory Contracts or Unexpired Leases after such date to the extent agreed to by the relevant counterparties or approved by an order of the Bankruptcy Court.

(f) The inclusion or exclusion of a contract or lease on any schedule or exhibit shall not constitute an admission by any Debtor that such contract or lease is an Executory Contract or Unexpired Lease or that any Debtor has any liability thereunder.

8.2. ***Payments Related to Assumption of Executory Contracts and Unexpired Leases***. Any monetary defaults under each Executory Contract and Unexpired Lease to be assumed or assumed and assigned pursuant to this Plan shall be satisfied, pursuant to section 365(b)(1) of the Bankruptcy Code, by payment of the amount of the Cure Claim in Cash on the Effective Date or on such other terms as the parties to such Executory Contracts or Unexpired Leases may otherwise agree. In the event of a dispute regarding: (a) the amount of any Cure Claim; (b) the ability of the Reorganized Debtors to provide "adequate assurance of future performance" (within the meaning of section 365 of the Bankruptcy Code), if applicable, under the Executory Contract or the Unexpired Lease to be assumed; or (c) any other matter pertaining to assumption, the Cure Claims shall be paid following the entry of a Final Order resolving the

dispute and approving the assumption of such Executory Contracts or Unexpired Leases; *provided*, that the Debtors or the Reorganized Debtors, as applicable, may settle any dispute regarding the amount of any Cure Claim without any further notice to or action, order or approval of the Bankruptcy Court.

8.3. ***Claims on Account of the Rejection of Executory Contracts or Unexpired Leases***.

(a) All Proofs of Claim with respect to Claims arising from the rejection of Executory Contracts or Unexpired Leases, pursuant to this Plan or the Confirmation Order, if any, must be Filed with the Bankruptcy Court within twenty-one (21) days after service of an order of the Bankruptcy Court (including the Confirmation Order) approving such rejection. Any Claim arising from the rejection of Executory Contracts or Unexpired Leases that becomes an Allowed Claim is classified and shall be treated as a General Unsecured Claim.

(b) Any Person or Entity that is required to File a Proof of Claim arising from the rejection of an Executory Contract or an Unexpired Lease that fails to timely do so shall be forever barred, estopped and enjoined from asserting such Claim, and such Claim shall not be enforceable, against the Debtors, the Reorganized Debtors or the Estates, and the Debtors, the Reorganized Debtors and their Estates and their respective Assets and property shall be forever discharged from any and all indebtedness and liability with respect to such Claim unless otherwise ordered by the Bankruptcy Court or as otherwise provided herein. All such Claims shall, as of the Effective Date, be subject to the permanent injunction set forth in Article X, Section 10.5 hereof.

8.4. ***Survival of the Debtors' Indemnification Obligations***.

Except as otherwise provided in this Plan or the Confirmation Order, and subject to the Schedule of Retained Causes of Action, to the fullest extent permitted by applicable law, the Indemnification Obligations shall not be discharged, impaired, or otherwise affected by this Plan; *provided*, that the Debtors or the applicable Reorganized Debtors, as applicable, shall not indemnify any such officers, directors, agents, or employees of the Debtors for any Claims or Causes of Action arising out of or relating to any act or omission for which indemnification is barred under applicable law or that is excluded under the terms of the foregoing organizational documents or applicable agreements governing the Debtors' Indemnification Obligations. Except as otherwise provided in this Plan, all such Indemnification Obligations shall be deemed and treated as Executory Contracts that are assumed by the Debtors under this Plan. Notwithstanding anything to the contrary set forth in this Section 8.4 of this Plan or elsewhere, the Debtors and the Reorganized Debtors, as applicable, shall not be obligated to indemnify and hold harmless any Entity for any claim, cause of action, liability, judgment, settlement, cost or expense of the Non-Released Parties (as defined in the Plan Supplement).

8.5. ***Employee Plans***.

(a) All Employee Plans that exist as of the Petition Date shall be assumed on the Effective Date as Executory Contracts pursuant to sections 365 and 1123 of the Bankruptcy Code. For the avoidance of doubt, the assumption of any Employee Plans shall not trigger any applicable change of control, immediate vesting, termination, or similar provisions therein, including any right to severance pay in connection with a change in control. For the avoidance of doubt, unless expressly agreed to in writing between the Debtors and the Required Consenting First Lien Lenders (except as provided in the Restructuring Support Agreement) if an Employee Plan provides in part for an award or potential award of Interests or consideration based on the value of Interests that have not vested into Existing Parent Equity Interests as of the Petition Date, such Employee Plan shall be assumed in all respects other than the

provisions of such agreement relating to Interest awards, which interest awards shall be canceled and discharged.

(b) As of the Effective Date, the Debtors and the Reorganized Debtors shall continue to honor their obligations under all applicable workers' compensation programs and in accordance with all applicable workers' compensation Laws in states in which the Reorganized Debtors operate. Any Claims arising under workers' compensation programs shall be deemed withdrawn once satisfied without any further notice to or action, order, or approval of the Bankruptcy Court; *provided*, that nothing in this Plan shall limit, diminish, or otherwise alter the Debtors' or Reorganized Debtors' defenses, Causes of Action, or other rights under applicable law, including non-bankruptcy Law, with respect to any such workers' compensation programs; *provided further*, that nothing herein shall be deemed to impose any obligations on the Debtors in addition to what is provided for under applicable state Law.

8.6. ***Insurance Policies***.

(a) All insurance policies to which any Debtor is a party as of the Effective Date, including any D&O Policy, shall be deemed to be and treated as Executory Contracts and shall be assumed by the applicable Debtors or the Reorganized Debtors and shall continue in full force and effect thereafter in accordance with their respective terms and shall survive unimpaired under this Plan, and all such insurance policies shall vest in the Reorganized Debtors. Coverage for defense and indemnity under the D&O Policies shall remain available to all individuals within the definition of "Insured" in any D&O Policy.

(b) In addition, after the Effective Date, all officers, directors, agents, or employees who served in such capacity at any time before the Effective Date shall be entitled to the full benefits of any D&O Policy (including any "tail" policy) for the full term of such policy regardless of whether such officers, directors, agents, and/or employees remain in such positions after the Effective Date, in each case, to the extent set forth in such policies and on terms no less favorable than the Debtors' existing policies.

(c) In addition, after the Effective Date, the Reorganized Debtors shall not terminate or otherwise reduce the coverage under any D&O Policy (including any "tail policy") in effect as of the Petition Date, and any current and former directors, officers, members, managers, agents or employees of any of the Debtors who served in such capacity at any time prior to the Effective Date shall be entitled to the full benefits of any such D&O Policy for the full term of such policy regardless of whether such members, managers, directors, and/or officers remain in such positions after the Effective Date to the extent set forth in such policies.

(d) In the event that the Debtors determine that an Allowed Claim is covered in full or in part under one of the Debtors' insurance policies, no distributions under this Plan shall be made on account of such Allowed Claim unless and until, and solely to the extent that, (i) the Holder of such Allowed Claim has exhausted all remedies with respect to such insurance policy, and (ii) an insurer authorized to issue a coverage position under such insurance policy, or the agent of such insurer, issues a formal determination, which the Debtors in their sole discretion do not contest, that coverage under such insurance policy is excluded or otherwise unavailable for losses arising from such Allowed Claim. Any proceeds available pursuant to one of the Debtors' insurance policies shall reduce the Allowed amount of a Claim on a dollar-for-dollar basis. To the extent that one or more of the Debtors' insurers agrees to satisfy a Claim in full or in part (if and to the extent adjudicated by a court of competent jurisdiction), then immediately upon such insurers' agreement, the applicable portion of such Claim may be expunged without a Claim objection having to be Filed and without any further notice to or action, order, or approval of the Bankruptcy Court. If an applicable insurance policy has a SIR, the Holder of an Insured Claim shall have an Allowed General Unsecured Claim or a Subordinated Claim, as applicable, solely up to the amount of the SIR that may be established upon the liquidation of the Insured Claim. Such SIR shall be considered satisfied

pursuant to this Plan through allowance of the General Unsecured Claim or Subordinated Claim, as applicable, solely in the amount of the applicable SIR, if any; *provided*, that nothing herein obligates the Debtors or the Reorganized Debtors to otherwise satisfy any SIR under any insurance policy. Any recovery on account of the Insured Claim in excess of the SIR established upon the liquidation of the Claim shall be recovered solely from the Debtors' insurance coverage, if any, and only to the extent of available insurance coverage and any proceeds thereof. Nothing in this Plan shall be construed to limit, extinguish, or diminish the insurance coverage that may exist or shall be construed as a finding that liquidated any Claim payable pursuant to an insurance policy.

8.7. ***Assignment***.

To the extent provided under the Bankruptcy Code or other applicable law, any Executory Contract or Unexpired Lease assumed and assigned, or otherwise transferred, hereunder shall remain in full force and effect for the benefit of the transferee or assignee in accordance with its terms, notwithstanding any provision in such Executory Contract or Unexpired Lease (including those of the type set forth in section 365(b)(2) of the Bankruptcy Code) that prohibits, restricts, or conditions such transfer or assignment. To the extent provided under the Bankruptcy Code or other applicable law, any provision that prohibits, restricts, or conditions the assignment or transfer of any such Executory Contract or Unexpired Lease or that terminates or modifies such Executory Contract or Unexpired Lease or allows the counterparty to such Executory Contract or Unexpired Lease to terminate, modify, recapture, impose any penalty, condition renewal or extension, or modify any term or condition upon any such transfer and assignment, constitutes an unenforceable anti-assignment provision and is void and of no force or effect.

8.8. ***Modifications, Amendments, Supplements, Restatements, or Other Agreements***.

Unless otherwise provided herein or by separate order of the Bankruptcy Court, each Executory Contract and Unexpired Lease that is assumed shall include any and all modifications, amendments, supplements, restatements, or other agreements made directly or indirectly by any agreement, instrument, or other document that in any manner affects such Executory Contract or Unexpired Lease.

8.9. ***Reservation of Rights***.

(a) Neither the exclusion nor inclusion of any contract or lease by the Debtors on any exhibit, schedule, or other annex to this Plan or in the Plan Supplement, nor anything contained in this Plan, will constitute an admission by the Debtors that any such contract or lease is or is not in fact an Executory Contract or Unexpired Lease or that the Debtors or the Reorganized Debtors or their respective Affiliates has any liability thereunder.

(b) Except as otherwise provided in this Plan, nothing in this Plan will waive, excuse, limit, diminish, or otherwise alter any of the defenses, claims, Causes of Action, or other rights of the Debtors and the Reorganized Debtors under any executory or non-Executory Contract or any Unexpired Lease or expired lease.

(c) Nothing in this Plan will increase, augment, or add to any of the duties, obligations, responsibilities, or liabilities of the Debtors or the Reorganized Debtors under any executory or non-Executory Contract or any Unexpired Lease or expired lease.

(d) If there is a dispute regarding a Cure Claim or whether a contract or lease is or was executory or unexpired at the time of assumption or rejection under this Plan, the Debtors or Reorganized Debtors, as applicable, shall have sixty (60) days following entry of a Final Order resolving such dispute to alter their treatment of such contract or lease by Filing a notice indicating such altered treatment.

ARTICLE IX.

CONDITIONS PRECEDENT TO CONSUMMATION OF THIS PLAN.

9.1. ***Conditions Precedent to the Effective Date***.

(a) The effectiveness of this Plan will be subject to the satisfaction or waiver in writing of customary conditions to effectiveness, as well as such other conditions as may be agreed by the Debtors and the Required Consenting Creditors, including the conditions precedent to effectiveness set forth in Article IX (as applicable, collectively, the "*Conditions Precedent*").

(b) The following are Conditions Precedent to the Effective Date of this Plan; *provided*, that each condition precedent may be waived by the Debtors with the consent of the Required Consenting Creditors, in each case, with such consent rights being exercised in accordance with the Restructuring Support Agreement:

(i) The Restructuring Support Agreement shall not have been terminated as to the Required Consenting First Lien Lenders or Required Consenting Second Lien Noteholders, and shall be in full force and effect;

(ii) The Bankruptcy Court shall have entered the Final DIP Order, which order shall not have been reversed, stayed, amended, modified, dismissed, vacated, or reconsidered;

(iii) The Bankruptcy Court shall have entered the Confirmation Order, and such Confirmation Order shall not have been reversed, stayed, amended, modified, dismissed, vacated, or reconsidered;

(iv) The Exit Facilities Documents shall have been entered into by the Reorganized Debtors, and all conditions precedent to the effectiveness of the Exit Facilities Documents, other than the occurrence of the Effective Date, shall have been satisfied or waived in accordance with the terms thereof, such that the Exit Facilities Documents will be in full force and effect on the occurrence of the Effective Date;

(v) All Restructuring Expenses shall have been paid in full in Cash in accordance with the terms of this Plan and the Restructuring Support Agreement;

(vi) The Definitive Documents (a) shall be consistent with the Restructuring Term Sheet and the Restructuring Support Agreement and otherwise approved by the applicable parties thereto consistent with their respective consent and approval rights as set forth in the Restructuring Support Agreement, (b) shall have been executed or deemed executed and delivered by each party thereto, and any conditions precedent related thereto shall have been satisfied or waived by the applicable party thereto, and (c) to the extent applicable, shall be adopted by the applicable Entity on terms consistent with the Restructuring Support Agreement and the Restructuring Term Sheet;

(vii) All governmental and third-party approvals and consents necessary, if any, in connection with the transactions contemplated by the Restructuring Term Sheet and the Restructuring Support Agreement shall have been obtained, not subject to unfulfilled conditions, and be in full force and effect, and all applicable waiting periods shall have expired without action being taken or threatened by any competent authority that would restrain, prevent or otherwise impose materially adverse conditions on such transactions;

(viii) The Debtors shall have implemented the Restructuring Transactions and all transactions contemplated by this Plan; and

(ix) The Professional Fee Escrow shall have been established and funded in full in Cash.

9.2. ***Timing of Conditions Precedent***.

Notwithstanding when a Condition Precedent to the Effective Date occurs, for the purposes of this Plan, such Condition Precedent shall be deemed to have occurred simultaneously upon the completion of the Conditions Precedent to the Effective Date; *provided*, that to the extent a Condition Precedent (the "***Prerequisite Condition***") may be required to occur prior to another Condition Precedent (a "***Subsequent Condition***") then, for purposes of this Plan, the Prerequisite Condition shall be deemed to have occurred immediately prior to the applicable Subsequent Condition regardless of when such Prerequisite Condition or Subsequent Condition shall have occurred.

9.3. ***Waiver of Conditions Precedent***.

(a) Each of the Conditions Precedent of this Plan may be waived in writing by the Debtors and the Required Consenting First Lien Lenders (except as otherwise provided in the Restructuring Support Agreement); *provided*, that the waiver of the Condition Precedent in Article IX, Section 9.1(b)(ix) shall require the consent of the affected Professionals; *provided*, *further*, that the waiver of the Condition Precedent in Article IX, Section 9.1(b)(v) shall require the consent of the affected First Lien Agent or Second Lien Notes Trustee, as applicable and each with respect to payment of their respective Restructuring Expenses.

(b) The stay of the Confirmation Order pursuant to Bankruptcy Rule 3020(e) shall be deemed waived by and upon the entry of the Confirmation Order, and the Confirmation Order shall take effect immediately upon its entry.

9.4. ***Effect of Non-Occurrence of the Effective Date***.

If the Effective Date does not occur, this Plan shall be null and void in all respects and nothing contained in this Plan or the Disclosure Statement shall (a) constitute a waiver or release of any Claims by or against or any Interests in the Debtors, (b) prejudice in any manner the rights of any Entity, or (c) constitute an admission, acknowledgement, offer, or undertaking by the Debtors, any of the Consenting Creditors, or any other Entity.

ARTICLE X.

EFFECT OF CONFIRMATION AND CONSUMMATION OF PLAN.

10.1. ***Vesting of Assets in the Reorganized Debtors***.

Except as otherwise provided herein, or in any agreement, instrument, or other documents incorporated into this Plan, on the Effective Date, pursuant to section 1141(b) and (c) other applicable provisions of the Bankruptcy Code, all property in each Debtor's Estate, all Causes of Action, and any property acquired by any of the Debtors under this Plan shall vest in each respective Reorganized Debtor, free and clear of all Liens, Claims, charges, or other encumbrances unless expressly provided otherwise by this Plan or Confirmation Order and subject to the terms of the Definitive Documents. For the avoidance of doubt, all rights, benefits, and protections provided to any of the Debtors or their Estates pursuant to this

Plan, the Plan Supplement, or the Confirmation Order including the release, exculpation, and injunction provisions provided in Article X of this Plan, shall vest in each respective Reorganized Debtor unless expressly provided otherwise by this Plan or the Confirmation Order. On and after the Effective Date, except as otherwise provided herein, each Reorganized Debtor may operate its business and may use, acquire, or dispose of property and pursue, compromise or settle any Claims, Interests, or Causes of Action without supervision or approval by the Bankruptcy Court and free of any restrictions of the Bankruptcy Code or Bankruptcy Rules. Without limiting the foregoing, the Reorganized Debtors may pay the charges that they incur on or after the Effective Date for professional fees, disbursements, expenses, or related support services without application to the Bankruptcy Court.

10.2. ***Binding Effect***.

As of the Effective Date, this Plan shall bind all Holders of Claims against and Interests in the Debtors and their respective successors and assigns, notwithstanding whether any such Holders were (a) Impaired or Unimpaired under this Plan, (b) presumed to accept or deemed to reject this Plan, (c) failed to vote to accept or reject this Plan, or (d) voted to reject this Plan.

10.3. ***Discharge of Claims and Termination of Interests***.

Pursuant to section 1141(d) of the Bankruptcy Code, and except as otherwise specifically provided in the Definitive Documents, this Plan or in a contract, instrument, or other agreement or document executed pursuant to this Plan, the distributions, rights, and treatment that are provided in this Plan shall be in complete satisfaction, discharge, and release, effective as of the Effective Date, of Claims, Interests, and Causes of Action of any nature whatsoever, including any interest accrued on Claims or Interests from and after the Petition Date, whether known or unknown, against, liabilities of, Liens on, obligations of, rights against, and interests in, the Debtors or any of their Assets or properties, regardless of whether any property shall have been distributed or retained pursuant to this Plan on account of such Claims and Interests, including demands, liabilities, and Causes of Action that arose before the Effective Date, any contingent or non-contingent liability on account of representations or warranties issued on or before the Effective Date, and all debts of the kind specified in sections 502(g), 502(h), or 502(i) of the Bankruptcy Code, in each case whether or not (i) a Proof of Claim based upon such debt or right is Filed or deemed Filed pursuant to section 501 of the Bankruptcy Code; (ii) a Claim or Interest based upon such debt, right, or Interest is Allowed pursuant to section 502 of the Bankruptcy Code; or (iii) the Holder of such a Claim or Interest has voted to accept this Plan. Any default or "event of default" by the Debtors with respect to any Claim or Interest that existed immediately before or on account of the filing of the Chapter 11 Cases shall be deemed cured (and no longer continuing) as of the Effective Date with respect to a Claim that is Unimpaired by this Plan. The Confirmation Order shall be a judicial determination of the discharge of all Claims and Interests subject to the Effective Date occurring.

10.4. ***Term of Injunctions or Stays***.

Unless otherwise provided herein or in a Final Order of the Bankruptcy Court, all injunctions or stays arising under or entered during the Chapter 11 Cases under section 105 or 362 of the Bankruptcy Code, or otherwise, and in existence on the Confirmation Date, shall remain in full force and effect until the later of the Effective Date and the date indicated in the order providing for such injunction or stay.

10.5. ***Permanent Injunction***.

Except as otherwise expressly provided in the Restructuring Support Agreement, this Plan or the Confirmation Order, from and after the Effective Date, all Persons are, to the fullest extent permitted under Section 524 and other applicable provisions of the Bankruptcy Code, permanently enjoined from (a)

commencing or continuing, in any manner or in any place, any suit, action or other proceeding of any kind; (b) enforcing, attaching, collecting, or recovering in any manner or means any judgment, award, decree, or order; (c) creating, perfecting, or enforcing any Lien or encumbrance; (d) asserting a right of setoff or subrogation of any kind; or (e) commencing or continuing in any manner any action or other proceeding of any kind, in each case on account of or with respect to any Claim, demand, liability, obligation, debt, right, Cause of Action, Interest, or remedy released or to be released, exculpated or to be exculpated, settled or to be settled, or discharged or to be discharged pursuant to this Plan or the Confirmation Order against any Person so released, discharged, or exculpated (or the property or estate of any Person or Entity so released, discharged, or exculpated). All injunctions or stays provided for in the Chapter 11 Cases under Sections 105 or 362 of the Bankruptcy Code, or otherwise, and in existence on the Confirmation Date, shall remain in full force and effect until the Effective Date.

No Person may commence or pursue a Claim or Cause of Action, as applicable, of any kind against the Debtors, the Reorganized Debtors, the Exculpated Parties, or the Released Parties, as applicable, that relates to or is reasonably likely to relate to any act or omission in connection with, relating to, or arising out of a Claim or Cause of Action, as applicable, subject to Article IX hereof, without the Bankruptcy Court (a) first determining, after notice and a hearing, that such Claim or Cause of Action, as applicable, represents a colorable Claim of any kind, and (b) specifically authorizing such Person to bring such Claim or Cause of Action, as applicable, against any such Debtor, Reorganized Debtor, Exculpated Party, or Released Party, as applicable; provided, that the foregoing shall only apply to Claims or Causes of Action brought against a Released Party if such Person bringing such Claim or Cause of Action is a Releasing Party. At the hearing for the Bankruptcy Court to determine whether such Claim or Cause of Action represents a colorable Claim of any kind, the Bankruptcy Court may, or shall if any Debtor, Reorganized Debtor, Exculpated Party, Released Party, or other party in interest requests by motion (oral motion being sufficient), direct that such Person seeking to commence or pursue such Claim or Cause of Action File a proposed complaint with the Bankruptcy Court embodying such Claim or Cause of Action, such complaint satisfying the applicable Rules of Federal Procedure, including Rule 8 and Rule 9 (as applicable), which the Bankruptcy Court shall assess before making a determination. For the avoidance of doubt, any party that obtains such determination and authorization and subsequently wishes to amend the authorized complaint or petition to add any Claims or Causes of Action not explicitly included in the authorized complaint or petition must obtain authorization from the Bankruptcy Court before filing any such amendment in the court where such complaint or petition is pending. The Bankruptcy Court reserves jurisdiction to adjudicate any such claims to the maximum extent provided by the law.

10.6. ***Releases***.

(a) Releases by the Debtors.

To the fullest extent permitted by applicable law and approved by the Bankruptcy Court, and except as otherwise expressly set forth in this Plan or the Confirmation Order, pursuant to section 1123(b) of the Bankruptcy Code, as of the Effective Date, in exchange for good and valuable consideration, the adequacy of which is hereby confirmed, each of Debtors, Reorganized Debtors, Reorganized Parent, and the Estates, in each case on behalf of itself and its respective successors, assigns, and Representatives, and any and all other Persons who may purport to assert any Claim or Cause of Action, directly or derivatively, by, through, for, or because of the foregoing Persons, has and is deemed to have, forever and unconditionally released, and absolved each Released Party from any and all Claims, obligations, rights, suits, damages, and Causes of Action, remedies, and liabilities whatsoever whether known or unknown, foreseen or unforeseen, existing or hereinafter arising, in law, equity, or otherwise, including any derivative claims asserted or assertable on behalf of the Debtors, the Estates, Reorganized Parent, or the Reorganized Debtors, that such Entity would have been legally entitled to assert in its own right (whether individually or collectively) or on behalf of the Holder of any Claim against, or Interest in, a Debtor or other Entity, based on or relating

to, or in any manner arising from, in whole or in part, the Debtors, including (i) the governance, management, transactions, ownership, or operation of the Debtors or the Non-Debtor Affiliates, (ii) the purchase, acquisition, sale, merger or rescission of any business line, Assets, or Security of the Debtors or the Non-Debtor Affiliates, (iii) the subject matter of, or the transactions, events, circumstances, acts or omissions giving rise to, any Claim or Interest that is treated in the Restructuring Transactions, including the negotiation, formulation, or preparation of the Restructuring Transactions, (iv) the business or contractual arrangements between any Debtor or Non-Debtor Affiliate and any other Entity (including Consenting Creditors), (v) the Prepetition Funded Debt Documents, (vi) the Debtors' and Non-Debtor Affiliates' in- or out-of-court restructuring efforts, (vii) intercompany transactions, (viii) the formulation, preparation, dissemination, negotiation, solicitation, entry into, Filing, or consummation of this Plan, the Plan Supplement the Disclosure Statement, the Restructuring Support Agreement and related prepetition transactions, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, the New Corporate Governance Documents, the Chapter 11 Cases, or any Restructuring Transaction, (ix) any contract, instrument, release, or other agreement or document created or entered into in connection with this Plan, the Plan Supplement, the Disclosure Statement, the Restructuring Support Agreement, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, the New Corporate Governance Documents, the Chapter 11 Cases, the pursuit of Confirmation and consummation of the Plan, the administration and implementation of the Plan or Confirmation Order, including the issuance or distribution of securities pursuant to the Plan, (x) the distribution, including any disbursements made by a Distribution Agent, of property under this Plan, or any other related agreement, or (xi) any other act or omission, transaction, agreement, event, or other occurrence related to any of the foregoing and taking place on or before the Effective Date; *provided*, that the Debtors do not release Claims or Causes of Action (1) that are of a commercial nature and arise in the ordinary course of business, such as accounts receivable and accounts payable on account of goods being sold and services being performed; (2) arising under an Executory Contract or Unexpired Lease that is assumed by the Debtors; or (3) arising out of, or related to, any act or omission of a Released Party that is determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction to have constituted actual fraud, gross negligence, or willful misconduct (it being agreed that any Released Parties' consideration, approval, or receipt of any distribution did not arise from or relate to actual fraud (but not, for the avoidance of doubt, fraudulent transfers, gross negligence, or willful misconduct). Notwithstanding anything to the contrary in the foregoing, the Releases set forth above do not release (1) any obligations of any Person under this Plan, the Confirmation Order, any other Definitive Document, any Restructuring Transaction, any document, instrument, or agreement (including those set forth in the Plan Supplement) executed to implement this Plan or any agreement, Claim, or obligation arising or assumed under this Plan or (2) any Causes of Action specifically retained by the Debtors pursuant to the Schedule of Retained Causes of Action.

Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval, pursuant to Bankruptcy Rule 9019, of the Debtor Release, which includes by reference each of the related provisions and definitions contained in this Plan, and further, shall constitute the Bankruptcy Court's finding that the Debtor Release is: (1) in exchange for the good and valuable consideration provided by each of the Released Parties, including the Released Parties' substantial contributions to facilitating the Restructuring Transactions and implementing this Plan; (2) a good-faith settlement and compromise of the Claims released by the Debtors; (3) in the best interests of the Debtors and all Holders of Claims and Interests; (4) fair, equitable, and reasonable; (5) given and made after due notice and opportunity for hearing; and (6) a bar to any of the Debtors, the Reorganized Debtors, the Reorganized Parent or the Debtors' Estates asserting any Claim or Cause of Action released pursuant to the Debtor Release.

(b) Releases by Holders of Claims and Interests.

To the fullest extent permitted by applicable law and approved by the Bankruptcy Court, and except as otherwise expressly set forth in this Plan or the Confirmation Order, as of the Effective Date, in exchange

for good and valuable consideration, the adequacy of which is hereby confirmed, each Releasing Party, in each case on behalf of itself and its respective successors, assigns, and Representatives, and any and all other Persons who may purport to assert any Claim or Cause of Action, directly or derivatively, by, through, for, or because of the foregoing Persons, has and is deemed to have, forever and unconditionally, released, and absolved each Released Party from any and all Claims, obligations, rights, suits, damages, and Causes of Action, remedies, and liabilities whatsoever, whether known or unknown, foreseen or unforeseen, existing or hereinafter arising, in law, equity, or otherwise, including any derivative claims asserted or assertable on behalf of the Debtors, the Estates, the Reorganized Parent, or the Reorganized Debtors that such Person would have been legally entitled to assert in its own right (whether individually or collectively) or on behalf of the Holder of any Claim against, or Interest in, a Debtor or other Person, based on or relating to, or in any manner arising from, in whole or in part, the Debtors, including (i) the governance, management, transactions, ownership, or operation of the Debtors or the Non-Debtor Affiliates, (ii) the purchase, acquisition, sale, merger, or rescission of any business line, Assets, or Security of the Debtors or the Non-Debtor Affiliates, (iii) the subject matter of, or the transactions, events, circumstances, acts or omissions giving rise to, any Claim or Interest that is treated in the Restructuring Transactions, including the negotiation, formulation, or preparation of the Restructuring Transactions, (iv) the business or contractual arrangements between any Debtor or Non-Debtor Affiliate and any other Person (including Consenting Creditors), (v) the Prepetition Funded Debt Documents, (vi) the Debtors' and Non-Debtor Affiliates' in- or out-of-court restructuring efforts, (vii) intercompany transactions, (viii) the formulation, preparation, dissemination, negotiation, solicitation, entry into, Filing, or consummation of this Plan, the Plan Supplement the Disclosure Statement, the Restructuring Support Agreement and related prepetition transactions, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, the New Corporate Governance Documents, the Chapter 11 Cases, or any Restructuring Transaction, (ix) any contract, instrument, release, or other agreement or document created or entered into in connection with this Plan, the Plan Supplement, the Disclosure Statement, the Restructuring Support Agreement, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, or the New Corporate Governance Documents, the Chapter 11 Cases, the pursuit of Confirmation and consummation of the Plan, the administration and implementation of the Plan or Confirmation Order, including the issuance or distribution of securities pursuant to the Plan, (x) the distribution, including any disbursements made by a Distribution Agent, of property under this Plan, or any other related agreement, or (xi) any other act or omission, transaction, agreement, event, or other occurrence related to any of the foregoing and taking place on or before the Effective Date; *provided*, that the Releasing Parties do not release Claims or Causes of Action (1) arising out of, or related to, any act or omission of a Released Party that is determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction to have constituted actual fraud (but not, for the avoidance of doubt, fraudulent transfers), gross negligence, or willful misconduct (it being agreed that any Released Parties' consideration, approval, or receipt of any distribution did not arise from or relate to actual fraud, gross negligence, or willful misconduct) or (2) against a Released Party arising from any obligations owed to the Releasing Party that are wholly unrelated to the Debtors, the Reorganized Parent, or the Reorganized Debtors. Notwithstanding anything to the contrary in the foregoing, the Releases set forth above do not release (1) any obligations of any Person under this Plan, the Confirmation Order, any other Definitive Document, any Restructuring Transaction, any document, instrument, or agreement (including those set forth in the Plan Supplement) executed to implement this Plan or any agreement, Claim, or obligation arising or assumed under this Plan or (2) any Causes of Action specifically retained by the Debtors pursuant to the Schedule of Retained Causes of Action.

Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval, pursuant to Bankruptcy Rule 9019, of the Third-Party Release, which includes by reference each of the related provisions and definitions contained in this Plan, and, further, shall constitute the Bankruptcy Court's finding that the Third-Party Release is: (1) consensual; (2) given and made after due notice and opportunity

for hearing; and (3) a bar to any of the Releasing Parties asserting any Claim or Cause of Action released pursuant to the Third-Party Release.

10.7. ***Exculpation***.

Effective as of the Effective Date, to the fullest extent permitted by law, the Exculpated Parties shall neither have nor incur any liability to any Person for any Claims or Causes of Action for any act taken or omitted to be taken between the Petition Date and the Effective Date in connection with, or related to, formulating, negotiating, preparing, disseminating, implementing, administering, confirming or effecting the Confirmation or consummation (as applicable) of this Plan, the Restructuring Support Agreement and related prepetition transactions, and the Disclosure Statement including any disbursements made by a Distribution Agent in connection with this Plan, the Disclosure Statement, the Definitive Documents, the Corporate Governance Documents, the Prepetition Funded Debt Documents, or any Restructuring Transaction, contract, instrument, release, or other agreement or document created or entered into in connection with this Plan, or any other postpetition act taken or omitted to be taken in connection with or in contemplation of the restructuring of the Debtors, the approval of the Disclosure Statement or Confirmation or consummation of this Plan; *provided*, that the foregoing provisions of this exculpation shall not operate to waive or release: (a) any Claims or Causes of Action arising from willful misconduct, gross negligence, or actual fraud (but not, for the avoidance of doubt, fraudulent transfers) of such applicable Exculpated Party as determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction; and/or (b) the rights of any Person to enforce this Plan. and the contracts, instruments, releases, indentures, and other agreements and documents delivered under or in connection with this Plan, or assumed pursuant to this Plan or Final Order of the Bankruptcy Court; *provided further*, that each Exculpated Party shall be entitled to rely upon the advice of counsel concerning its respective duties pursuant to, or in connection with, the above referenced documents, actions, or inactions.

The Exculpated Parties have, and upon consummation of this Plan shall be deemed to have, participated in good faith and in compliance with the applicable laws with regard to the solicitation of votes and distribution of consideration pursuant to this Plan and, therefore, are not, and on account of such distributions shall not be, liable at any time for the violation of any applicable law, rule, or regulation governing the solicitation of acceptances or rejections of this Plan or such distributions made pursuant to this Plan.

The foregoing exculpation shall be effective as of the Effective Date without further notice to or order of the Bankruptcy Court, act, or action under applicable law, regulation, order, or rule or the vote, consent, authorization, or approval of any Person. For the avoidance of doubt and notwithstanding anything else herein, the foregoing exculpation shall be limited to Persons that served as Estate fiduciaries during the Chapter 11 Cases.

10.8. ***Retention of Causes of Action/Reservation of Rights***.

In accordance with section 1123(b) of the Bankruptcy Code, but subject in all respects to this Article X, the Reorganized Debtors shall have, retain, reserve and be entitled to assert, and may enforce all rights to commence and pursue, as appropriate, any and all claims or Causes of Action, whether arising before or after the Petition Date, including any actions specifically enumerated in the Schedule of Retained Causes of Action, and such rights to commence, prosecute, or settle such Causes of Action shall be preserved notwithstanding the occurrence of the Effective Date. The Reorganized Debtors shall have, retain, reserve, and be entitled to assert all rights of setoff or recoupment, and other legal or equitable defenses as fully as if the Chapter 11 Cases had not been commenced, and all of the Debtors' legal and equitable rights in respect of any Unimpaired Claim may be asserted after the Confirmation Date and Effective Date to the same extent as if the Chapter 11 Cases had not been commenced. The Debtors or the

Reorganized Debtors, as applicable, expressly reserve all rights to prosecute any and all Causes of Action against any Entity not released pursuant to this Plan or the Plan Supplement.

10.9. ***Ipso Facto and Similar Provisions Ineffective***.

Except to the extent otherwise allowed hereunder, any term of any prepetition policy, prepetition contract, or other prepetition obligation applicable to a Debtor shall be void and of no further force or effect with respect to any Debtor or Reorganized Debtor, as applicable, to the extent that such policy, contract, or other obligation is conditioned on, creates an obligation of the Debtor as a result of, or gives rise to a right of any Person based on any of the following: (a) the insolvency or financial condition of a Debtor; (b) the commencement of the Chapter 11 Cases; (c) the Confirmation or consummation of this Plan, including any change of control that shall occur as a result of such consummation; or (d) the restructuring.

10.10. ***Solicitation of Plan***.

As of and subject to the occurrence of the Confirmation Date: (a) the Debtors, the Exculpated Parties, and the Released Parties, as applicable, shall be deemed to have solicited acceptances of this Plan and to have acted in good faith and in compliance with the applicable provisions of the Bankruptcy Code, including sections 1125(a), (e), and (g) of the Bankruptcy Code, and any applicable non-bankruptcy law, rule, or regulation governing the adequacy of disclosure in connection with such solicitation; and (b) (i) the Debtors, (ii) the Consenting Creditors, and (iii) each of the Debtors and Consenting Creditors' respective directors, officers, employees, Affiliates, agents, financial advisors, investment bankers, professionals, accountants, and attorneys shall be deemed to have participated in good faith and in compliance with the applicable provisions of the Bankruptcy Code in the offer and issuance of any Securities under this Plan, and therefore, all of the foregoing parties, are not, and on account of such offer, issuance, and solicitation will not be, liable at any time for any violation of any applicable law, rule, or regulation governing the solicitation of acceptances or rejections of this Plan or the offer and issuance of any Securities under this Plan.

10.11. ***Corporate and Limited Liability Company Action***.

Upon the Effective Date, all actions contemplated by this Plan shall be deemed authorized and approved in all respects, including (a) the assumption of the Employee Plans assumed pursuant to Article VIII, Section 8.5(a), subject to Article VIII, Sections 8.5(a)-(b), (b) the selection of the managers, directors, and officers for the Reorganized Debtors, (c) the distribution of the Plan Securities, (d) the approval of the Restructuring Support Agreement and the Definitive Documents, and (e) all other actions contemplated by this Plan (whether to occur before, on, or after the Effective Date), in each case in accordance with and subject to the terms hereof. All matters provided for in this Plan involving the corporate or limited liability company structure of the Debtors or the Reorganized Debtors, and any corporate or limited liability company action required by the Debtors or the Reorganized Debtors in connection with this Plan shall be deemed to have occurred and shall be in effect, without any requirement of further action by the Holders of Collateral, directors, managers, or officers of the Debtors or the Reorganized Debtors. On or (as applicable) before the Effective Date, the appropriate officers of the Debtors or the Reorganized Debtors, as applicable, shall be authorized and empowered to issue, execute, and deliver the agreements, documents, Securities, and instruments contemplated by this Plan (or necessary or desirable to effect the transactions contemplated by this Plan) in the name of and on behalf of the Reorganized Debtors, including (w) the New Corporate Governance Documents and (x) any and all other agreements, documents, Securities, and instruments

relating to the foregoing. The authorizations and approvals contemplated by this Article X, Section 10.11 shall be effective notwithstanding any requirements under non-bankruptcy law.

10.12. ***SEC Reservation of Rights***.

Notwithstanding any language to the contrary contained in the Disclosure Statement, this Plan, and/or the Confirmation Order, no provision of the Disclosure Statement, this Plan or the Confirmation Order shall (i) preclude the United States Securities and Exchange Commission ("SEC") from enforcing its police or regulatory powers; or (ii) enjoin, limit, impair, or delay the SEC from commencing or continuing any claims, causes of action, proceedings or investigations against any non-debtor person or entity in any forum.

10.13. ***No Governmental Releases***.

Except as expressly provided for in this Plan, nothing in this Plan, the Confirmation Order, or other related Plan documents shall affect a release or limit any Claim arising solely under the enforcement of the police powers or regulatory activities of the United States Government or any of its agencies, or any state and local authority, whatsoever.

ARTICLE XI.

RETENTION OF JURISDICTION.

11.1. ***Retention of Jurisdiction***.

On and after the Effective Date, the Bankruptcy Court shall retain exclusive jurisdiction over all matters arising in, arising under, and related to the Chapter 11 Cases for, among other things, the following purposes:

(a) to hear and determine motions and/or applications for the assumption, assumption and assignment, or rejection of Executory Contracts and Unexpired Leases, including resolution of all disputes regarding Cure Claims, and the allowance, classification, priority, compromise, estimation, or payment of Claims resulting therefrom;

(b) to determine any motion, adversary proceeding, proceeding, application, contested matter, and other litigated matter pending on or commenced after the Confirmation Date;

(c) to hear and resolve any disputes arising from or related to (i) any orders of the Bankruptcy Court granting relief under Bankruptcy Rule 2004 or (ii) any protective orders entered by the Bankruptcy Court in connection with the foregoing;

(d) to ensure that distributions to Holders of Allowed Claims are accomplished as provided for in this Plan and Confirmation Order and to adjudicate any and all disputes arising from or relating to the manner of, or entitlement to, distributions under this Plan;

(e) to consider the allowance, classification, priority, compromise, estimation, or payment of any Claim or any counterclaim related thereto;

(f) to enter, implement or enforce such orders as may be appropriate in the event the Confirmation Order is for any reason stayed, reversed, revoked, modified, or vacated;

(g) to issue injunctions, enter and implement other orders, and take such other actions as may be necessary or appropriate to restrain interference by any Entity with the consummation, implementation, or enforcement of this Plan, the Confirmation Order, or any other order of the Bankruptcy Court;

(h) to hear and determine any application to modify this Plan in accordance with section 1127 of the Bankruptcy Code, to remedy any defect or omission or reconcile any inconsistency in this Plan, or any order of the Bankruptcy Court, including the Confirmation Order, in such a manner as may be necessary to carry out the purposes and effects thereof;

(i) to hear and determine all Professional Fee Claims;

(j) to hear and determine disputes arising in connection with or related to the interpretation, implementation, or enforcement of this Plan, the Plan Supplement, or the Confirmation Order or any agreement, instrument, or other document created by or in connection with, governing, or relating to any of the foregoing;

(k) to take any action and issue such orders as may be necessary to construe, interpret, enforce, implement, execute, and consummate this Plan;

(l) to determine such other matters and for such other purposes as may be provided in the Confirmation Order;

(m) to hear and determine matters concerning state, local, and federal taxes in accordance with sections 346, 505, and 1146 of the Bankruptcy Code (including any requests for expedited determinations under section 505(b) of the Bankruptcy Code);

(n) to hear and determine matters concerning Securities laws exemptions under section 1145 of the Bankruptcy Code;

(o) to hear, adjudicate, decide, or resolve any and all matters related to Article X of this Plan, including the releases, discharge, exculpations, and injunctions issued thereunder;

(p) to resolve disputes concerning Disputed Claims or the administration thereof;

(q) to resolve any disputes concerning whether a Person had sufficient notice of the Chapter 11 Cases, the Disclosure Statement, any solicitation conducted in connection with the Chapter 11 Cases, any claims bar date established in the Chapter 11 Cases, or any deadline for responding or objecting to a Cure Claim, in each case, for the purpose of determining whether a Claim or Interest is discharged hereunder or for any other purposes;

(r) to hear and determine any other matters related hereto and not inconsistent with the Bankruptcy Code and title 28 of the United States Code;

(s) to enter a final decree closing the Chapter 11 Cases;

(t) to recover all Assets of the Debtors and property of the Debtors' Estates, wherever located; and

(u) to hear and determine any rights, claims, or Causes of Action held by or accruing to the Debtors pursuant to the Bankruptcy Code or pursuant to any federal statute or legal theory.

11.2. ***Courts of Competent Jurisdiction***.

If the Bankruptcy Court abstains from exercising, or declines to exercise, jurisdiction or is otherwise without jurisdiction over any matter arising out of this Plan, such abstention, refusal, or failure of jurisdiction shall have no effect upon and shall not control, prohibit, or limit the exercise of jurisdiction by any other court having competent jurisdiction with respect to such matter.

ARTICLE XII.

MISCELLANEOUS PROVISIONS.

12.1. ***Payment of Statutory Fees***.

On the Effective Date and thereafter as may be required, the Reorganized Debtors shall pay all fees incurred pursuant to sections 1911 through 1930 of chapter 123 of title 28 of the United States Code, together with interest, if any, pursuant to § 3717 of title 31 of the United States Code for each Debtor's case, or until such time as a final decree is entered closing a particular Debtor's case, a Final Order converting such Debtor's case to a case under chapter 7 of the Bankruptcy Code is entered, or a Final Order dismissing such Debtor's case is entered.

12.2. ***Statutory Committee***.

On the Effective Date, the current and former members of the Committee, and their respective officers, employees, counsel, advisors and agents, will be released from all further authority, duties, responsibilities and obligations related to and arising from and in connection with the Chapter 11 Cases and the Committee will dissolve; provided, however, that following the Effective Date, the Committee will continue in existence and have standing and a right to be heard for the following limited purpose of pursuing Claims and final fee applications Filed pursuant to sections 330 and 331 of the Bankruptcy Code. Following the completion of the Committee's remaining duties set forth above, the Committee will be dissolved, and the retention or employment of the Committee's respective attorneys, accountants and other agents will terminate without further notice to, or action by, any Entity.

12.3. ***Substantial Consummation of this Plan***.

On the Effective Date, this Plan shall be deemed to be substantially consummated under sections 1101 and 1127(b) of the Bankruptcy Code.

12.4. ***Request for Expedited Determination of Taxes***.

The Debtors shall have the right to request an expedited determination under section 505(b) of the Bankruptcy Code with respect to tax returns Filed, or to be Filed, for any and all taxable periods ending after the Petition Date through the Effective Date, and in the case of any Debtor that is to be dissolved, through the completion of its dissolution.

12.5. ***Exemption from Certain Transfer Taxes***.

Pursuant to and to the fullest extent permitted by section 1146 of the Bankruptcy Code, (a) the issuance, transfer or exchange of any Securities, instruments or documents, (b) the creation, filing or recording of any Lien, mortgage, deed of trust, or other security interest, (c) the making, assignment, filing or recording of any lease or sublease or the making or delivery of any deed, bill of sale, assignment or other instrument of transfer under, pursuant to, in furtherance of, or in connection with this Plan, including any

deeds, bills of sale, or assignments executed in connection with any of the transactions contemplated under this Plan or the reinvesting, transfer, or sale of any real or personal property of the Debtors pursuant to, in implementation of or as contemplated in this Plan (whether to one or more of the Reorganized Debtors or otherwise), and (d) the issuance, renewal, modification, or securing of indebtedness by such means, and the making, delivery or recording of any deed or other instrument of transfer under, in furtherance of, or in connection with, this Plan, including the Confirmation Order, shall constitute a "transfer under a plan" within the purview of section 1146 of the Bankruptcy Code and shall not be subject to or taxed under any law imposing any stamp or similar tax, including any document recording tax, conveyance fee, mortgage tax, real estate transfer tax, mortgage recording tax, Uniform Commercial Code filing or recording fee, regulatory filing or recording fee, sales tax, use tax, or other similar governmental assessment. Consistent with the foregoing, each recorder of deeds or similar official, officer or agent for any county, city, or Governmental Unit in which any instrument hereunder is to be recorded shall, pursuant to the Confirmation Order, be ordered and directed to accept such instrument without requiring the payment of any filing fees, documentary stamp tax, deed stamps, transfer tax, intangible tax, or other stamp or similar taxes.

12.6. ***Amendments***.

(a) *Plan Modifications*. Subject to the consent rights set forth in the Restructuring Support Agreement, this Plan may be amended, modified, or supplemented by the Debtors in the manner provided for by section 1127 of the Bankruptcy Code or as otherwise permitted by applicable law without additional disclosure pursuant to section 1125 of the Bankruptcy Code. In addition, after the Confirmation Date, so long as such action does not materially and adversely affect the treatment of Holders of Allowed Claims or Interests pursuant to this Plan, subject to the consent rights set forth in the Restructuring Support Agreement, the Debtors may remedy any defect or omission or reconcile any inconsistencies in this Plan or the Confirmation Order with respect to such matters as may be necessary to carry out the purposes of effects of this Plan, and any Holder of a Claim or Interest that has accepted this Plan shall be deemed to have accepted this Plan as amended, modified, or supplemented.

(b) *Other Amendments*. Subject to the consent rights set forth in the Restructuring Support Agreement, before the Effective Date, the Debtors may make technical adjustments and modifications to this Plan and the documents contained in the Plan Supplement without further order or approval of the Bankruptcy Court.

12.7. ***Effectuating Documents and Further Transactions***.

Each of the officers of the Reorganized Debtors is authorized, in accordance with his or her authority under the resolutions of the applicable board of directors or managers, to execute, deliver, File, or record such contracts, instruments, releases, indentures, and other agreements or documents and take such actions as may be necessary or appropriate to effectuate and further evidence the terms and conditions of this Plan.

12.8. ***Revocation or Withdrawal of this Plan***.

The Debtors reserve the right to revoke or withdraw this Plan prior to the Effective Date as to any or all of the Debtors with the consent of the Required Consenting First Lien Lenders (except as provided in the Restructuring Support Agreement); *provided*, that the Debtors may revoke or withdraw this Plan without such consent in the exercise of the Debtors' fiduciary duty or as otherwise permitted under the Restructuring Support Agreement. If, with respect to a Debtor, this Plan has been revoked or withdrawn prior to the Effective Date, or if Confirmation or the occurrence of the Effective Date as to such Debtor does not occur on the Effective Date, then, with respect to such Debtor: (a) this Plan shall be null and void in all respects; (b) any settlement or compromise embodied in this Plan (including the fixing or limiting to an amount any

Claim or Interest or Class of Claims or Interests), assumption of Executory Contracts or Unexpired Leases affected by this Plan, and any document or agreement executed pursuant to this Plan shall be deemed null and void; and (c) nothing contained in this Plan shall (i) constitute a waiver or release of any Claim by or against, or any Interest in, such Debtor or any other Entity; (ii) prejudice in any manner the rights of such Debtor or any other Entity; or (iii) constitute an admission of any sort by any Debtor, any of the Consenting Creditors, or any other Entity.

12.9. ***Severability of Plan Provisions***.

If, before the entry of the Confirmation Order, any term or provision of this Plan is held by the Bankruptcy Court to be invalid, void, or unenforceable, the Bankruptcy Court, at the request of the Debtors and with the consent of the Required Consenting First Lien Lenders (except as provided in the Restructuring Support Agreement), shall have the power to alter and interpret such term or provision to make it valid or enforceable to the maximum extent practicable, consistent with the original purpose of the term or provision held to be invalid, void, or unenforceable, and such term or provision shall then be applicable as altered or interpreted; *provided* that any such alteration or interpretation shall be consistent with the Restructuring Support Agreement and the remainder of the terms and provisions of this Plan will remain in full force and effect and will in no way be affected, impaired, or invalidated by such holding, alteration, or interpretation. The Confirmation Order shall constitute a judicial determination and shall provide that each term and provision of this Plan, as it may have been altered or interpreted in accordance with the foregoing, is (a) valid and enforceable pursuant to its terms, (b) integral to this Plan and may not be deleted or modified without the consent of the Debtors or the Reorganized Debtors (as the case may be), and (c) non-severable and mutually dependent.

12.10. ***Governing Law***.

Except to the extent that the Bankruptcy Code or other federal law is applicable, or to the extent an exhibit hereto or a Definitive Document provides otherwise, the rights, duties, and obligations arising under this Plan shall be governed by, and construed and enforced in accordance with, the laws of the State of New York, without giving effect to the principles of conflict of laws thereof.

12.11. ***Time***.

In computing any period of time prescribed or allowed by this Plan, unless otherwise set forth herein or determined by the Bankruptcy Court, the provisions of Bankruptcy Rule 9006 shall apply.

12.12. ***Dates of Actions to Implement this Plan***.

In the event that any payment or act under this Plan is required to be made or performed on a date that is on a Business Day, then the making of such payment or the performance of such act may be completed on or as soon as reasonably practicable after the next succeeding Business Day, but shall be deemed to have been completed as of the required date.

12.13. ***Immediate Binding Effect***.

Notwithstanding any Bankruptcy Rule providing for a stay of the Confirmation Order or Plan, including Bankruptcy Rules 3020(e), 6004(h), 7062, or otherwise, upon the occurrence of the Effective Date, the terms of this Plan and Plan Supplement shall be immediately effective and enforceable and deemed binding upon and inure to the benefit of the Debtors, the Holders of Claims and Interests, the Released Parties, and each of their respective successors and assigns, including the Reorganized Debtors, all Entities that are parties to or are subject to the settlements, compromises, releases, and injunctions

described in this Plan, and any and all non-Debtor parties to Executory Contracts and Unexpired Leases with the Debtors. All Claims shall be as fixed, adjusted, or compromised, as applicable, pursuant to this Plan regardless of whether any Holder of a Claim, Interest, or debt has voted on this Plan.

12.14. ***Deemed Acts***.

Subject to and conditioned on the occurrence of the Effective Date, whenever an act or event is expressed under this Plan to have been deemed done or to have occurred, it shall be deemed to have been done or to have occurred without any further act by any party, by virtue of this Plan and the Confirmation Order.

12.15. ***Successor and Assigns***.

The rights, benefits, and obligations of any Entity named or referred to in this Plan shall be binding on, and shall inure to the benefit of any heir, executor, administrator, successor, or permitted assign, if any, of each Entity.

12.16. ***Entire Agreement***.

On the Effective Date, this Plan, the Plan Supplement, and the Confirmation Order shall supersede all previous and contemporaneous negotiations, promises, covenants, agreements, understandings, and representations on such subjects, all of which have become merged and integrated into this Plan.

12.17. ***Exhibits to Plan***.

All exhibits, schedules, supplements, and appendices to this Plan (including the Plan Supplement) are incorporated into and are a part of this Plan as if set forth in full herein.

12.18. ***Notices***.

All notices, requests, and demands to or upon the Debtors to be effective shall be in writing (including by electronic transmission) and, unless otherwise expressly provided herein, shall be deemed to have been duly given or made when actually delivered or addressed as follows:

(a) if to the Debtors or the Reorganized Debtors:

ModivCare Inc.
6900 E Layton Ave, Suite 1100 & 1200
Denver, CO 80237
Faisal Khan (Faisal.Khan@modivcare.com)

with a copy (which will not constitute notice) to:

Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020
Ray C. Schrock (ray.schrock@lw.com)
Keith Simon (keith.simon@lw.com)
George Klidonas (george.klidonas@lw.com)
Jon Weichselbaum (jon.weichselbaum@lw.com)

Hunton Andrews Kurth LLP
600 Travis Street, Suite 4200
Houston, TX 77002
Timothy A. ("Tad") Davidson II (taddavidson@hunton.com)
Catherine A. Rankin (crankin@hunton.com)
Brandon Bell (bbell@hunton.com)

(b) if to the Consenting Creditors, to:

Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Kris Hansen (krishansen@paulhastings.com)

and

Paul Hastings LLP
71 S Wacker Drive, Floor 45
Chicago, IL 60606
Matt Warren (mattwarren@paulhastings.com)
Lindsey Henrikson (lindsey.henrikson@paulhastings.com)

After the Effective Date, the Debtors and the Reorganized Debtors, as applicable, are authorized to limit the list of Persons receiving documents pursuant to Bankruptcy Rule 2002, to those persons who have filed after Confirmation a renewed request to receive documents pursuant to Bankruptcy Rule 2002.

[*Remainder of page intentionally left blank.*]

Dated: December 5, 2025

Respectfully submitted,

By: */s/ Chad J. Shandler*
Name: Chad J. Shandler
Title: Chief Transformation Officer

On behalf of ModivCare Inc. and its Debtor Affiliates

Exhibit B

Form of Effective Date Notice

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
Debtors.[1]	:	(Jointly Administered)

NOTICE OF (I) ENTRY OF ORDER CONFIRMING SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES, (II) OCCURRENCE OF SUCH PLAN'S EFFECTIVE DATE, AND (III) RELATED DEADLINES WITH RESPECT TO ADMINISTRATIVE EXPENSE AND REJECTION DAMAGE CLAIMS

THE LEGAL PROCEEDINGS AND TRANSACTIONS DESCRIBED IN THIS NOTICE (THIS "*NOTICE*") MAY AFFECT YOUR RIGHTS. PLEASE READ THE BELOW CAREFULLY AND TAKE NOTICE THAT:

On December 5, 2025, ModivCare Inc. and its debtor affiliates (collectively, the "***Debtors***" or the "***Reorganized Debtors***", as applicable) filed the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (together with the Plan Supplement, in each case as amended, modified, or supplemented from time to time, the "***Plan***").[2]

The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") held a hearing to consider confirmation of the Plan which commenced on December 8, 2025, and concluded on [●]. On [●], the Court entered the *Order (I) Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of 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. [●]] (the "***Confirmation Order***"). Pursuant to its terms, the Plan was substantially consummated and became effective on [●] (the "***Plan Effective Date***").

---

[1] A complete list of each of the Debtors in the 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.'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.

[2] Capitalized terms used in this Notice but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

Deadlines for Filing Administrative Claims and Contract Rejection Claims

On **[●]**, at [●] p.m. (Prevailing Central Time) (the "***Administrative Claims Bar Date***") was established by the Court as the deadline by which holders of Administrative Claims must file proofs of administrative claim against the Reorganized Debtors. The proof of administrative claim form (the "***Proof of Administrative Claim Form***") is available free of charge on the website of the Reorganized Debtors' claims and noticing agent Kurtzman Carson Consultants, LLC (d/b/a Verita Global) (the "***Claims and Noticing Agent***"): https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare (the "***Restructuring Website***").

Holders of the following Administrative Claims are **not** required to file a Proof of Administrative Claim on or before the Administrative Claims Bar Date solely with respect to such Administrative Claim: (i) an Administrative Claim against the Reorganized Debtors for which a signed proof of administrative claim has already been properly filed with the Clerk of the Court or the Claims and Noticing Agent in a form substantially similar to the Proof of Administrative Claim Form; (ii) an Administrative Claim that has been previously allowed, and/or paid in full by the Debtors, in accordance with the Bankruptcy Code or an order of the Court, (iii) an Administrative Claim that constitutes a Professional Fee Claim, and (iv) any claim of any "governmental unit," as that term is defined under the Bankruptcy Code, under section 503(b)(1)(D) of the Bankruptcy Code (collectively, the "***Excluded Administrative Claims***").

On [●], at [●] p.m. (Prevailing Central Time) (the "***Contract Rejection Claims Bar Date***" and together with the Administrative Claims Bar Date, the "***Applicable Bar Date***") was established by the Court as the deadline by which Holders of Claims arising from rejection of Executory Contracts or Unexpired Leases must file proofs of claim against the Debtors (the "***Contract Rejection Claims***"). The proof of claim form is available free of charge on the Restructuring Website. A separate rejection notice will be sent to all known non-Debtor contract counterparties to such rejected contracts and leases with a proof of claim form (the "***Proof of Contract Rejection Claim Form***" and together with the Proof of Administrative Claim Form, the "***Applicable Forms***"). Contract Rejection Claims will be treated as Class 4 General Unsecured Claims.

All Holders of Administrative Claims (other than Excluded Administrative Claims) and Contract Rejection Claims must submit (by overnight mail, courier service, hand delivery, regular mail or in person) an original, written Proof of Administrative Claim Form or Proof of Contract Rejection Claim Form, as applicable, so as to be **actually received** by the Claims and Noticing Agent, by no later than [●] p.m. (Prevailing Central Time) on or before [●], via electronic submission on the following webpage of the Restructuring Website: https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare, or, alternatively, at the following address:

ModivCare Inc.
c/o Verita Ballot Processing Center
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

The Applicable Forms will be deemed timely filed only if **actually received** by the Claims and Noticing Agent on or before the Applicable Bar Date. The Applicable Forms may **not** be delivered by facsimile, telecopy, or e-mail transmission. Any facsimile, telecopy, or electronic mail submissions will **not** be accepted and will **not** be deemed filed until the Applicable Form is submitted to the Claims and Noticing Agent by overnight mail, courier service, hand delivery, regular mail, in person or electronically through the Claims and Noticing Agent's website.

Parties wishing to receive acknowledgment that their Applicable Forms were received by the Claims and Noticing Agent must submit (i) a copy of the Applicable Form and (ii) a self-addressed, stamped envelope (in addition to the original Applicable Form sent to the Claims and Noticing Agent).

To be valid, your Applicable Form **MUST** be (i) signed by the applicable Holder of the Administrative Claim or Contract Rejection Claim, as applicable; (ii) written in the English language; (iii) denominated in lawful currency of the United States; and (iv) submitted with copies of any supporting documentation or an explanation of why any such documentation is not available.

Any Holder of an Administrative Claim or Contract Rejection Claim, as applicable, who is required, but fails, to file the Applicable Form with the Claims and Noticing Agent on or before the Applicable Bar Date shall be forever barred, estopped and enjoined from asserting such claim against the Debtors or the Reorganized Debtors, and the Debtors' and the Reorganized Debtors' property shall be forever discharged from any and all indebtedness or liability with respect to such claim.

The Plan and the Confirmation Order may be viewed for free on the Restructuring Website, or for a fee on the Court's website at http://www.txs.uscourts.gov/page/bankruptcy-court.

Dated: [●]
Houston, Texas

Respectfully submitted,

/s/

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
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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)
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george.klidonas@lw.com
jon.weichselbaum@lw.com

Attorneys for the Reorganized Debtors

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

In re:	Chapter 11
MODIVCARE, INC., *et al.,*[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: January 2, 2026 @ 4:00 p.m. (CT)

THIRD MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	11/1/2025	11/30/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$1,042,772.60 (80% of $1,303,465.75)	
Total expenses requested in this Fee Statement:	$5,121.11	
Total fees and expenses requested in this Fee Statement:	$1,047,893.71	
Blended hourly rate for professionals:	$1,111.70	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	80.9	$ 118,114.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	26.6	37,639.00
Marc Brown	Partner & Managing Director	$1,415	63.9	90,418.50
Greg Magrisi	Partner & Managing Director	$1,250	84.5	105,625.00
Christopher Rubel	Partner	$1,225	88.7	108,657.50
Johnny Lee	Partner	$1,225	31.1	38,097.50
Elizabeth S Kardos	Partner	$950	8.5	8,075.00
Ashutosh Panda	Director	$1,150	161.7	185,955.00
Joel Amico	Director	$1,150	123.1	141,565.00
Iain Nelson	Director	$1,120	0.3	336.00
Matthew D Gates	Director	$1,120	18.1	20,272.00
Ryan Komendowski	Director	$1,080	114.3	123,444.00
Matthew Root	Director	$1,000	63.2	63,200.00
Matthew Wicker	Director	$1,000	1.5	1,500.00
Kaitlyn Sundt McClarren	Director	$715	0.7	500.50
John Tutty	Senior Vice President	$950	31.2	29,640.00
Thomas G Prince	Senior Vice President	$950	30.3	28,785.00
Christopher Cuomo	Senior Vice President	$910	8.8	8,008.00
Susan Clark	Senior Vice President	$910	84.5	76,895.00
Chase Hood	Senior Vice President	$850	70.0	59,500.00
Claire Allshouse	Vice President	$810	14.6	11,826.00
Lucas Lovatto	Vice President	$835	44.5	37,157.50
Lisa Marie Bonito	Vice President	$580	21.0	12,180.00
Total Hours and Fees for Professionals			**1,172.5**	**$ 1,307,690.50**
Less: 50% Travel Fees				(4,224.75)
Total Fees for Professionals				**$ 1,303,465.75**
Less: 20% Holdback				(260,693.15)
Total Fees for Professionals Less Holdback				**$ 1,042,772.60**
		Average Billing Rate		**$ 1,111.70**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	26.3	$ 30,620.00
1.2	Meetings & Communication with UCC and Creditors	72.8	89,607.00
1.3	Prepare Committee Presentations	29.0	32,334.50
1.5	Mediation and Settlement Communications	1.1	1,147.00
1.7	Liquidity and Cash Management	17.3	17,097.00
1.9	Business and Strategic Plan	346.2	368,358.50
1.11	Financial and Other Diligence	89.6	96,935.00
1.12	Other Motions and Related Objections	13.0	15,043.00
1.13	Litigation Support & Investigations	259.5	314,830.50
1.14	Claims Analysis	33.5	33,005.50
1.15	Valuation and Solvency Analysis	222.6	251,382.50
1.17	RSA, Disclosure Statement & Plan of Reorganization	23.5	25,888.00
1.19	Retention Application & Relationship Disclosures	1.3	1,244.50
1.20	Fee Applications & Fee Statements	23.0	14,888.00
1.22	Intercompany & Waterfall Analysis	6.8	6,860.00
1.31	Travel Time	7.0	4,224.75
	Total Hours and Fees By Matter Category Before Holdback	**1,172.5**	**$ 1,303,465.75**

Average Billing Rate $ 1,111.70

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Expense Category	Amount
Airfare	$ 778.54
Ground Transportation	828.57
Lodging	3,000.00
Meals	514.00
Total Expenses	**$ 5,121.11**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this third monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from November 1, 2025 through November 30, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $1,303,465.75 and reimbursement of out-of-pocket expenses in the amount of $5,121.11 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $1,042,772.60 (80% of $1,303,465.75) and 100% of out-of-pocket expenses in the amount of $5,121.11 for a total amount of $1,047,893.71; and (iii) such other and further relief as this Court deems proper.

Dated: December 18, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	KBM	Review case updates and next steps	0.4
11/04/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	DM	Review agenda for internal meeting re: ModivCare work plan and strategy	0.2
11/04/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	JA	Draft agenda items and workstream updates tracker for discussion with team	1.0
11/04/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/06/2025	CH	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/11/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/11/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	DM	Review agenda for internal discussion re: ModivCare work plan and strategy	0.2
11/11/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	JA	Draft key workstreams for upcoming diligence areas re depositions and outstanding diligence requests	0.6
11/11/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/18/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	DM	Review agenda for internal discussion re: ModivCare work plan and strategy	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	JA	Draft key workstream tracker and identify of update to priority deliverables	0.5
11/18/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.5
11/18/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/28/2025	JA	Update to workplan for key milestones and prepare summary	1.0
Total Professional Hours			**26.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.7	$	3,942.00
Kathryn B McGlynn	$1,415	2.4		3,396.00
Greg Magrisi	$1,250	2.1		2,625.00
Christopher Rubel	$1,225	1.3		1,592.50
Johnny Lee	$1,225	2.1		2,572.50
Ashutosh Panda	$1,150	2.1		2,415.00
Joel Amico	$1,150	5.2		5,980.00
Matthew D Gates	$1,120	0.8		896.00
Ryan Komendowski	$1,080	2.1		2,268.00
Thomas G Prince	$950	2.1		1,995.00
Christopher Cuomo	$910	0.8		728.00
Chase Hood	$850	2.6		2,210.00
Total Professional Hours and Fees		**26.3**	**$**	**30,620.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/04/2025	AP	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	CC	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	CR	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	DM	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	DM	Review emails with attachment from D. Litz, C. Shore (W&C), J. Amico re: ModivCare insurance policy renewals.	0.4
11/04/2025	GM	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	JA	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	JL	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.8
11/04/2025	MB	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	RK	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/05/2025	DM	Attend discussion with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, G. Magrisi (AlixPartners) re: expert report	0.5
11/05/2025	DM	Attend discussion with D. Rowe (Jupiter), C. Shore, S. Greissman, A. Zatz (W&C) re: ModivCare strategy	0.5
11/05/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare LC's analysis	0.3
11/05/2025	DM	Emails with A. Zatz, E. Smith (W&C), J. Amico and J. Lee re: ModivCare claims analysis	0.3
11/05/2025	GM	Attend discussion with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, G. Magrisi (AlixPartners) re: expert report	0.5
11/06/2025	AP	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	AP	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	CH	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	CH	Review update from counsel re: deposition summaries	0.4
11/06/2025	DM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	DM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	DM	Review email from A. Chase re: summary and analysis of Gutierrez deposition	0.2
11/06/2025	GM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	GM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	JA	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	JA	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	JL	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	KBM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	KBM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	MDG	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	MDG	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	RK	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	MDG	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/07/2025	CR	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	DM	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	DM	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	DM	Emails with C. Shore and E. Smith (W&C) re: Magrisi report	0.3
11/07/2025	DM	Review email with attachment from A. Hong (W&C) re: summary and analysis of Kern deposition	0.2
11/07/2025	GM	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	GM	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	JA	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	JL	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	KBM	Review case updates from Committee Counsel	0.6
11/07/2025	MB	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5

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Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	RK	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/08/2025	DM	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	DM	Emails with attachments with E. Smith (W&C), J. Amico and A. Panda re: ModivCare projections	0.6
11/08/2025	DM	Emails with attachments with E. Smith (W&C), R. Komendowski, G. Magrisi re: ModivCare projection's discrepancies	0.5
11/10/2025	DM	Review Magrisi report re: revenue opportunities	0.3
11/10/2025	DM	Discussion with J. Zakia (W&C) re: Magrisi report	0.2
11/11/2025	AP	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	DM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare uptier complaint	0.2
11/11/2025	DM	Review email with attachment from L. Miranda (W&C) re: D. Silvers report	0.6
11/11/2025	GM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	JA	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	JL	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	KBM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	RK	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/12/2025	DM	Emails with attachment with J. Zakia (W&C), D. MacGreevey, G. Magrisi, E. Kardos and R. Komendowski re: ModivCare expert report reliance materials	0.7

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/12/2025	DM	Emails with S. Greissman (W&C) re: analysis of market for LME's from 2020 to 2025	0.4
11/12/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/12/2025	KBM	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/12/2025	KBM	Review case updates from Committee Counsel and next steps	0.6
11/13/2025	AP	Participate in a call with G. Magrisi, A. Panda (AlixPartners) and Jason Zakia (W&C) re: business plan expert rebuttal report deposition	2.0
11/13/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	DM	Attend discussion with A. Zatz, A. Chase, L. Miranda (W&C) re: ModivCare uptier analysis	0.6
11/13/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	DM	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/13/2025	DM	Prepare talking points and issues list re: work plan and strategy for calls with ModivCare UCC and W&C	0.7
11/13/2025	GM	Participate in a call with G. Magrisi, A. Panda (AlixPartners) and Jason Zakia (W&C) re: business plan expert rebuttal report deposition	2.0
11/13/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	JA	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/18/2025	AP	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	CR	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	DM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	GM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	JA	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	KBM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	RK	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/19/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare testimony preparation	0.2
11/19/2025	KBM	Review case updates from Committee Counsel	0.4
11/20/2025	CH	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	CH	Call with V. Sachdev (W&C), J. Amico and C. Hood (AlixPartners) re: claims analysis	0.3
11/20/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	DM	Discussion with ModivCare UCC members re: case strategy	0.3
11/20/2025	DM	Emails with counsel to individual ModivCare UCC member re: concerns about post petition payment practices	0.2
11/20/2025	DM	Prepare for meetings with W&C and ModivCare UCC re: weekly updates and case strategies	0.5
11/20/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/21/2025	CH	Draft email to V. Sachdev (W&C) re: claims analysis by entity	1.1
11/21/2025	CH	Email correspondence with A. Zatz (W&C) re: operating cash receipts to date	0.3
11/21/2025	DM	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/21/2025	DM	Review email from L. Miranda re: summary of status conference	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/21/2025	JA	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/21/2025	JL	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/23/2025	CH	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/23/2025	JA	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/23/2025	RK	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/24/2025	CH	Call with J. Amico, C. Hood (AlixPartners), A. Zatz and others (W&C) re: unsecured claims analysis	0.4
11/24/2025	CH	Email correspondence with V. Sachdev (W&C) re: unsecured claims estimate	0.8
11/25/2025	AP	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	AP	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	AP	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	CH	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	CH	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	CH	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	DM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	DM	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	DM	Discussion with J. Zakia (W&C) re: debrief Magrisi deposition	0.2
11/25/2025	GM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	GM	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/25/2025	JA	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	JA	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	JA	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	KBM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	KBM	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	RK	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	RK	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	RK	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
Total Professional Hours			**72.8**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	17.7	$	25,842.00
Kathryn B McGlynn	$1,415	7.2		10,188.00
Marc Brown	$1,415	1.4		1,981.00
Greg Magrisi	$1,250	7.8		9,750.00
Christopher Rubel	$1,225	1.9		2,327.50
Johnny Lee	$1,225	3.5		4,287.50
Ashutosh Panda	$1,150	7.1		8,165.00
Joel Amico	$1,150	9.1		10,465.00
Matthew D Gates	$1,120	2.0		2,240.00
Ryan Komendowski	$1,080	6.4		6,912.00
Christopher Cuomo	$910	0.9		819.00
Chase Hood	$850	7.8		6,630.00
Total Professional Hours and Fees		**72.8**	**$**	**89,607.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	CH	Draft materials for upcoming Committee meeting re: liquidity and operations reporting	1.4
11/04/2025	MDG	Review presentation to Committee on claims	1.3
11/05/2025	CH	Draft updates to presentation for UCC covering claims analysis to incorporate comments from D. MacGreevey (AlixPartners)	1.6
11/05/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/05/2025	DM	Review revised draft presentation to ModivCare UCC re: preliminary claims analysis	0.4
11/05/2025	DM	Review, revise and comments on draft presentation to ModivCare UCC re: preliminary claims analysis	1.5
11/05/2025	JA	Draft materials for Committee meeting re case developments, liquidity other topics	1.5
11/05/2025	KBM	Review weekly Committee update presentation	0.6
11/05/2025	MDG	Review analysis of claims	2.0
11/06/2025	JA	Prepare materials for committee meeting	0.5
11/06/2025	MDG	Prepare for oral presentation of claims analysis	1.0
11/10/2025	CH	Draft materials for upcoming Committee meeting re: liquidity and operations reporting	1.3
11/11/2025	CH	Draft materials for upcoming Committee call re: revised DIP budget and liquidity	1.4
11/11/2025	CH	Draft updates to DIP budget and liquidity presentation to incorporate comments from J. Amico (AlixPartners)	1.3
11/12/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/12/2025	JA	Draft update materials for UCC Committee meeting	1.8
11/13/2025	JA	Draft edits to committee presentation materials	0.5
11/13/2025	KBM	Review weekly Committee update presentation	0.7
11/17/2025	CH	Draft materials for weekly Committee meeting covering liquidity and operations update	1.4
11/18/2025	JA	Prepare update materials for UCC meeting	1.3
11/19/2025	DM	Review, revise and comments on draft presentation to ModivCare UCC re: weekly updates	0.5
11/19/2025	DM	Provide additional comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/19/2025	JA	Draft Committee materials for upcoming call	0.9
11/20/2025	KBM	Review weekly Committee update presentation	0.6
11/24/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.4
11/24/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.8
11/24/2025	JA	Draft Committee presentation materials	1.0
11/25/2025	JA	Draft revisions to Committee materials	0.5
Total Professional Hours			**29.0**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.0	$	7,300.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Joel Amico	$1,150	8.0		9,200.00
Matthew D Gates	$1,120	4.3		4,816.00
Chase Hood	$850	9.8		8,330.00
Total Professional Hours and Fees		**29.0**	**$**	**32,334.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	TGP	Analyze potential settlement terms	0.9
11/07/2025	DM	Review emails from S. Greissman re: ModivCare settlement proposal	0.2
Total Professional Hours			**1.1**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.2	$	292.00
Thomas G Prince	$950	0.9		855.00
Total Professional Hours and Fees		**1.1**	**$**	**1,147.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	KBM	Review weekly liquidity updates	0.4
11/03/2025	CH	Review variance and liquidity reporting package for week ended 10/26	0.8
11/03/2025	JA	Analyze cash reporting vs. Plan from Company and prepare diligence questions	0.5
11/08/2025	DM	Emails with attachments to J. Amico re: changes to ModivCare DIP budget	0.6
11/10/2025	CH	Analyze revised DIP budget and related assumptions	1.5
11/10/2025	CH	Draft bridge analysis and related commentary re: overlapping period between first and second revised DIP budgets	1.4
11/10/2025	CH	Draft comparative analysis re: forecasted and actual liquidity	0.7
11/10/2025	CH	Review variance and liquidity reporting package for week ended 11/2	0.6
11/11/2025	CH	Analyze liquidity bridge analysis between filed and revised DIP budget prepared by Debtors	0.9
11/11/2025	CH	Analyze revised emergence cash sources and uses	0.6
11/11/2025	CH	Draft analysis re: bridge between beginning and ending cash in second revised DIP budget	1.6
11/11/2025	CH	Draft diligence questions for FTI re: revised DIP budget and related assumptions	0.5
11/11/2025	JA	Review revised DIP forecast and prepare questions	1.0
11/17/2025	CH	Review variance reporting and liquidity package for week ended 11/9	0.9
11/17/2025	JA	Review Debtors liquidity and post petition vendors payments status	0.7
11/20/2025	JA	Review latest liquidity forecast and emergence cash details	1.1
11/24/2025	CH	Review variance and liquidity reporting package for week ended 11/16	0.8
11/25/2025	JA	Analyze emergence liquidity under various scenarios	1.2
11/26/2025	JA	Analyze liquidity outlook	1.5
Total Professional Hours			**17.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.6	$	876.00
Kathryn B McGlynn	$1,415	0.4		566.00
Joel Amico	$1,150	6.0		6,900.00
Chase Hood	$850	10.3		8,755.00
Total Professional Hours and Fees		**17.3**	**$**	**17,097.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
11/03/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.1
11/03/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
11/03/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.9
11/03/2025	GM	Conduct Business Plan and CapEx analysis and materials review	1.0
11/03/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	JA	Review business plan assessment report and provide comments	1.1
11/03/2025	JL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	JL	Revise report on business plan	2.0
11/03/2025	KBM	Review draft business plan report	1.4
11/03/2025	LL	Conduct further research about historical trends and future projections for PCS Medicaid reimbursement rates to assess financial impact and inform operational planning.	2.0
11/03/2025	LL	Finalize analysis of provider mix-shift to rideshare and its contribution to service expense cost savings.	2.8
11/03/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	SC	Revise materials for expert report, re: Business Plan workstream	2.7
11/03/2025	TGP	Analyze the Debtors' revenue projections	1.2
11/04/2025	AP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	AP	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.1
11/04/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.2
11/04/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.5
11/04/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.9
11/04/2025	CC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	CC	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	CC	Review business plan draft in advance of call with W&C	0.9
11/04/2025	GM	Review Business Plan and CapEx analysis and materials review	1.0
11/04/2025	IN	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3

AlixPartners

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Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/04/2025	JL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	JL	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	JL	Revise report on business plan	1.8
11/04/2025	LL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	LL	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.2
11/04/2025	LL	Prepare executive summary highlighting findings, sensitivities, and risk considerations for legal review.	2.5
11/04/2025	LL	Review top customer contracts re: contact center required service levels.	2.3
11/04/2025	LL	Update remaining models and report pages re: revised labor burden rate received from Debtors.	1.5
11/04/2025	SC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	SC	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	SC	Research benchmarks for expert report, re: Business Plan workstream	1.2
11/04/2025	SC	Revise materials for expert report, re: Business Plan workstream	2.4
11/04/2025	TGP	Analyze the Debtors' cost projections	1.1
11/04/2025	TGP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/05/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
11/05/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.6
11/05/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.3
11/05/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.6
11/05/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	DM	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Magrisi Expert Report	0.3
11/05/2025	DM	Review and comments on draft Magrisi report	1.2
11/05/2025	ESK	Review and revise Magrisi Expert Report	2.3
11/05/2025	ESK	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Magrisi Expert Report	0.3
11/05/2025	GM	Review Business Plan and CapEx analysis and materials review	1.1
11/05/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	JA	Review and provide comments on business plan assessment	0.6
11/05/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2

AlixPartners

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Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	JL	Revise report on business plan	1.4
11/05/2025	LL	Finalize business plan evaluation report for service expense and PCS sections, ensuring alignment between narrative, exhibits, and model outputs.	2.0
11/05/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	LL	Update PCS branch organization design section with revised role mapping and consolidation savings estimates.	1.5
11/05/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	SC	Research benchmarks for expert report, re: Business Plan	2.6
11/05/2025	SC	Review materials for expert report around benchmarking, re: Business Plan	1.6
11/05/2025	SC	Revise materials for expert report, re: Business Plan	2.7
11/05/2025	TGP	Analyze the Debtors' financial projections under various cost scenarios	1.9
11/06/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.9
11/06/2025	AP	Finalize EBITDA upside scenarios re: AlixPartners business plan expert report	2.0
11/06/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
11/06/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.2
11/06/2025	ESK	Revise Expert Report	1.6
11/06/2025	ESK	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Expert Report	0.4
11/06/2025	GM	Review Business Plan and CapEx analysis	1.2
11/06/2025	GM	Review materials for Business Plan and CapEx analysis	1.8
11/06/2025	JL	Revise report on business plan	1.2
11/06/2025	LL	Review report formatting, citations, and supporting schedules for consistency and professional presentation.	2.0
11/06/2025	SC	Create back-up materials to supplement expert report, re: Business Plan	2.8
11/06/2025	SC	Research industry benchmarks for back-office functions for expert report, re: Business Plan	1.8
11/06/2025	SC	Review benchmarks and materials for expert report, re: Business Plan	0.9
11/06/2025	SC	Revise materials around benchmarking for expert report, re: Business Plan	2.6
11/06/2025	TGP	Analyze the Debtors' financial projections under various cost scenarios	1.8
11/07/2025	CC	Create questions in advance of deposition with ModivCare management	0.9
11/07/2025	ESK	Revise Expert Report	0.2
11/07/2025	GM	Review Business Plan and CapEx analysis	3.0
11/07/2025	GM	Review materials for Business Plan and CapEx analysis	1.5
11/07/2025	GM	Meeting with G. Magrisi, L Lovatto (AlixPartners) re: review Business Plan	0.1
11/07/2025	GM	Call with G. Magrisi, S Clark (AlixPartners) re: review Business Plan assessment	0.2
11/07/2025	JA	Review latest draft of business plan assessment and provide follow up diligence requests	0.9
11/07/2025	JL	Revise report on business plan	1.5
11/07/2025	KBM	Review updates re: business plan expert report	0.4
11/07/2025	LL	Meeting with G. Magrisi, L Lovatto (AlixPartners) re: review Business Plan	0.1

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	LL	Update value tracker to reflect refined run-rate savings, cost to achieve and implementation timeline.	1.0
11/07/2025	RK	Review business plan rebuttal report for valuation analysis inputs.	2.4
11/07/2025	RK	Update valuation analysis for LC assumptions.	1.2
11/07/2025	SC	Call with G. Magrisi, S Clark (AlixPartners) re: review Business Plan assessment	0.2
11/07/2025	SC	Research additional benchmarks, industry trends, and data points to support expert report, re: Business Plan	2.9
11/07/2025	SC	Revise materials for expert report, re: Business Plan	2.6
11/07/2025	TGP	Analyze the Debtors' financial projections under various revenue and cost scenarios	1.6
11/08/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.9
11/08/2025	AP	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.8
11/08/2025	CC	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	CC	Prepare analysis of actual versus guidance for revenue and adjusted EBITDA	2.8
11/08/2025	CC	Respond to email from E. Smith of W&C re: report edits	0.2
11/08/2025	GM	Review Business Plan and CapEx analysis	1.0
11/08/2025	GM	Review materials for Business Plan and CapEx analysis	1.6
11/08/2025	GM	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	KBM	Review updates re: business plan expert report	0.6
11/09/2025	GM	Review Business Plan and CapEx analysis and materials review	1.7
11/10/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.1
11/10/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
11/10/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.8
11/10/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	DM	Emails with J. Amico re: ModivCare Georgia contract	0.2
11/10/2025	ESK	Email to/from D. MacGreevey (AlixPartners) re: finalization and execution of the Expert Report	0.3
11/10/2025	ESK	Review final Expert Report	0.5
11/10/2025	GM	Discussion with D. MacGreevey, G. Magrisi (AlixPartners) re: Magrisi report	0.2
11/10/2025	GM	Review Business Plan and CapEx analysis and materials review	7.0
11/10/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	JL	Finalize review/edits of business plan report in preparation for submission	1.6
11/10/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.6

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	KBM	Review final business plan expert report	1.1
11/10/2025	LL	Analyze corporate, NEMT and PCS real estate leases to assess opportunities of footprint optimization.	2.8
11/10/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	LL	Review terms and conditions of NEMT customer contracts.	2.5
11/10/2025	SC	Prepare back-up support for the G. Magrisi (AlixPartners) expert report re: the Debtors' business plan	2.8
11/10/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	SC	Prepare supporting bullets for findings in expert report, re: Business Plan	2.9
11/10/2025	SC	Update expert report with additional insights and supporting information, re: Business Plan	1.2
11/11/2025	AP	Prepare for deposition of Greg Magrisi re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.5
11/11/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
11/11/2025	LL	Update report to include external sources consulted during research process.	1.5
11/11/2025	SC	Prepare summary of supporting documents in expert report re: Debtors' Business Plan	0.8
11/11/2025	SC	Review deposition transcript for B. Gutierrez	2.7
11/11/2025	SC	Review deposition transcript for S.Kern	2.6
11/12/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	AP	Prepare for deposition of Greg Magrisi (AlixPartners) re: operating cost opinions re: AlixPartners business plan rebuttal report	2.9
11/12/2025	AP	Prepare for deposition of Greg Magrisi (AlixPartners) re: revenue opinions re: AlixPartners business plan rebuttal report	2.9
11/12/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
11/12/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	ESK	Emails re: expert report	0.2
11/12/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.0
11/12/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	LL	Review open business plan questions	0.3
11/12/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	SC	Review deposition transcript for K. Shepard	2.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/13/2025	AP	Prepare for deposition of Greg Magrisi on operating cost opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	2.8
11/13/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	2.6
11/13/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.1
11/13/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.5
11/13/2025	LL	Analyze earnings calls transcripts from 2022 to Q1 2025.	2.0
11/13/2025	SC	Prepare supporting points in expert report, re: Business Plan	1.9
11/13/2025	SC	Review deposition transcripts, B. Guitierrez, S. Kern	1.8
11/13/2025	SC	Research historical Debtor financial reporting to support expert report	1.8
11/13/2025	SC	Review support materials for expert report, re: Business Plan	2.0
11/13/2025	TGP	Review Magrisi report	0.8
11/14/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	AP	Prepare for deposition of Greg Magrisi on operating cost opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.1
11/14/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.3
11/14/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/14/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	LL	Researched and analyzed historical NEMT Medicaid reimbursement rate for NEMT across states.	3.0
11/17/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.6
11/17/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.5
11/17/2025	SC	Prepare for deposition, re: Business Plan diligence	2.4
11/18/2025	AP	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	AP	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	AP	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	AP	Prepare for deposition of Greg Magrisi on capex opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.5
11/18/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
11/18/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/18/2025	GM	Participate in a call with G. Magrisi and S. Clark (AlixPartners), re: Business Plan diligence	1.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	GM	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	GM	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	GM	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Prepared supplementary document re: methodology per request from Debtors' counsel.	1.5
11/18/2025	RK	Prepare confirmation rejection objection analyses.	2.8
11/18/2025	SC	Participate in a call with G. Magrisi and S. Clark (AlixPartners), re: Business Plan diligence	1.4
11/18/2025	SC	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	SC	Prepare for deposition, re: Business Plan diligence	2.4
11/19/2025	AP	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	AP	Prepare for deposition of Greg Magrisi on cost savings opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.9
11/19/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/19/2025	GM	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	JL	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	LL	Prepare supporting analysis and related files re: approach and methodology per request from Debtors' counsel.	1.2
11/19/2025	SC	Prepare for deposition, re: Business Plan diligence	1.6
11/20/2025	AP	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	AP	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	AP	Prepare for deposition of Greg Magrisi on cost savings opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.5
11/20/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/20/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	GM	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/20/2025	GM	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	LL	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	LL	Review documents and materials for deposition preparation	0.7
11/20/2025	LL	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	RK	Prepare confirmation objection analysis.	1.7
11/20/2025	RK	Review confirmation objection outline.	3.0
11/20/2025	RK	Review plan supplement for confirmation objection impacts.	1.9
11/20/2025	SC	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	SC	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	SC	Prepare for deposition re: Business Plan diligence	2.6
11/21/2025	AP	Participate in a call with G. Magrisi and A. Panda (AlixPartners) and E. Smith (W&C) re: deposition preparation.	0.5
11/21/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	3.5
11/21/2025	GM	Attend Marc Brown deposition re: valuation expert report	4.0
11/21/2025	GM	Participate in a call with G. Magrisi and A. Panda (AlixPartners) and E. Smith (W&C) re: deposition preparation.	0.5
11/21/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	LL	Review past deposition transcripts and researched follow up topics for deposition preparation.	2.5
11/21/2025	RK	Observation of valuation expert deposition.	4.5
11/21/2025	RK	Review confirmation objection draft.	2.6
11/21/2025	SC	Listen to deposition of M. Brown	2.3
11/21/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	SC	Prepare for deposition, re: Business Plan diligence	1.9
11/22/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.2
11/23/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	4.5
11/23/2025	RK	Review confirmation objection draft.	1.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/24/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
11/24/2025	ESK	Emails with internal team re: expert report issues	0.5
11/24/2025	RK	Observation of Magrisi deposition.	2.8
11/25/2025	AP	Update key assertions and opinions in the confirmation objection draft re: Debtor's business plan forecast and projections	2.9
11/25/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.9
11/25/2025	RK	Review expert rebuttal reports for confirmation objection.	1.9
Total Professional Hours			**346.2**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Kathryn B McGlynn	$1,415	3.5		4,952.50
Greg Magrisi	$1,250	59.7		74,625.00
Johnny Lee	$1,225	13.5		16,537.50
Elizabeth S Kardos	$950	6.3		5,985.00
Ashutosh Panda	$1,150	98.3		113,045.00
Joel Amico	$1,150	2.6		2,990.00
Iain Nelson	$1,120	0.3		336.00
Ryan Komendowski	$1,080	26.6		28,728.00
Thomas G Prince	$950	8.7		8,265.00
Christopher Cuomo	$910	6.8		6,188.00
Susan Clark	$910	73.7		67,067.00
Lucas Lovatto	$835	44.5		37,157.50
Total Professional Hours and Fees		**346.2**	**$**	**368,358.50**

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	DM	Review draft list of priority diligence questions	0.2
11/03/2025	JA	Analyze Debtors underlying financial model and evaluate various working capital requirements	1.5
11/03/2025	JA	Draft diligence questions for upcoming depositions	1.0
11/03/2025	JA	Draft diligence questions re open issues, emergence cash and claims	0.8
11/03/2025	JA	Review data room uploads and reconcile against outstanding questions list	1.0
11/03/2025	JT	Analyze working capital fluctuations from 12/31/25 to 12/31/26 in the company's valuation model	1.9
11/03/2025	KBM	Review updates re: outstanding information requests	0.4
11/03/2025	MDG	Review diligence items needed for lien challenge and update requests for Debtors	1.0
11/04/2025	JA	Analyze various issues re cash collateral, sureties and letters of credit	1.2
11/04/2025	JA	Draft and review of various waterfall scenarios based on different valuation scenarios	1.0
11/04/2025	JA	Draft diligence questions on business plan and certain assumptions on go forward cash requirements for upcoming diligence sessions	1.5
11/04/2025	JA	Review various data room documents re historical financial projections	0.5
11/04/2025	MDG	Analyze historical revenue figures by segment	0.3
11/04/2025	MDG	Update due diligence requests and send to Debtors	0.7
11/05/2025	CH	Review new documents uploaded to virtual data room for responsive documents	1.3
11/05/2025	DM	Review email with attachments from J. Amico re: diligence of ModivCare LC's	0.3
11/05/2025	JA	Analyze various documents re emergence liquidity, insurance and cash collateral	0.7
11/05/2025	JA	Draft questions list for upcoming depositions re business plan, Q1 2025 transactions and liquidity requirements	1.5
11/05/2025	JT	Analyze entity level trial balance for potential claims	0.7
11/05/2025	JT	Review company assumptions related to letters of credit	0.6
11/05/2025	MDG	Review data requests for lien challenge	1.6
11/05/2025	MDG	Update due diligence requests for Debtors	0.6
11/05/2025	TGP	Analyze the Debtors' assets by segment	2.3
11/06/2025	JA	Review documents and prepare proposed questions for upcoming depositions	1.4
11/06/2025	JA	Review various documents re projections per request from W&C	1.0
11/06/2025	JT	Analyze the intercompany matrix as of 7/31/25	1.7
11/06/2025	JT	Summarized outstanding surety bonds and LCs	1.4
11/06/2025	MDG	Review operating metrics file from Debtors	1.0
11/06/2025	TGP	Analyze the Debtors' historical balance sheet changes	1.6
11/07/2025	CH	Review operating metrics for postpetition period	0.7
11/07/2025	CH	Review update from counsel re: S. Kern deposition	0.4
11/07/2025	DM	Prepare diligence questions re: Shepard deposition	0.5
11/07/2025	JA	Analyze various supporting documents re exit financing providers	1.0
11/07/2025	JA	Draft various potential questions for upcoming depositions as well as flagging supporting documents	1.7
11/07/2025	JA	Working session with J. Amico and J. Tutty (AlixPartners) re: analysis of intercompany balances by legal entity	0.6
11/07/2025	JT	Analyze the assets and liabilities at each entity as of August 31	2.8
11/07/2025	JT	Analyze the intercompany balances held by each entity based on the trial balance and intercompany matrix	1.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	JT	Develop a summary of each entity's P&L as of August 31	1.7
11/07/2025	JT	Summarized total and scheduled claims at each entity	1.6
11/07/2025	JT	Working session with J. Amico and J. Tutty (AlixPartners) re: analysis of intercompany balances by legal entity	0.6
11/07/2025	MDG	Analyze operational metrics file and follow up with questions to FTI	0.8
11/07/2025	TGP	Analyze the Debtors change in working capital historically vs. projected	1.8
11/10/2025	CH	Review actuals performance for August and September	1.6
11/10/2025	CC	Research real estate fee applications for J. Amico of AlixPartners	0.3
11/10/2025	JA	Analyze Disclosure Statement projections and reconcile to various components used in valuation materials	1.3
11/10/2025	JA	Analyze proposals related to exit financing and prepare diligence questions	1.0
11/10/2025	JA	Review update on Debtor contract situation and impact on go forward budget	0.5
11/11/2025	CH	Review summary from counsel re: Silvers investigation report	0.3
11/11/2025	DM	Emails with E. Smith, A. Zatz (W&C), B. Marks (Latham), J. Amico re: ModivCare diligence and production of reliance materials	0.2
11/11/2025	JA	Review historical projections changes over time	0.8
11/11/2025	KBM	Review updates re: outstanding diligence requests	0.2
11/11/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/12/2025	DM	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/12/2025	JA	Draft diligence questions for upcoming Debtor depositions (business plan, sale process, liquidity)	1.3
11/12/2025	JA	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/12/2025	JA	Review and provide comments on UCC standing motion draft; follow up with additional diligence requests	1.5
11/12/2025	JA	Review K. Shepard deposition transcript	0.5
11/12/2025	JA	Review various capital structure changes and leverage over time	1.2
11/12/2025	JA	Review various debtor produced materials related to exit financing process	0.6
11/12/2025	RK	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/13/2025	DM	Review 11.12.25 letter from Latham to UST re: ModivCare	0.3
11/13/2025	JA	Review and provide comment on lien challenge and standing motion	1.0
11/13/2025	JA	Review data room for recent documents uploaded, review and summarize	1.2
11/13/2025	JA	Review UCC expert reports to identify areas of further diligence support	1.2
11/13/2025	KBM	Review Debtors' letter to the U.S. Trustee re: settlement phone call between ad hoc group and former board member	0.3
11/13/2025	KBM	Review updates re: outstanding diligence requests	0.3
11/14/2025	JA	Draft questions for upcoming Debtor depositions on business plan and liquidity	1.2
11/14/2025	JA	Prepare debtor diligence list re sources and uses at emergence	1.0
11/14/2025	JA	Review and provide comments on assumptions and calculations in UCC standing motion	0.8
11/14/2025	JA	Review data room re financial projections diligence	0.5
11/17/2025	CH	Review summary from counsel re: D. Gonzales deposition	0.5
11/17/2025	JA	Draft questions and review of related documents for Jamal deposition	1.0

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/17/2025	JA	Draft questions and review of related documents for Shandler deposition	1.5
11/17/2025	JA	Review Debtor and UCC valuation reports and identify methodology differences	1.2
11/18/2025	JA	Analyze exit financing providers and related term sheet proposals	0.5
11/18/2025	JA	Review data room for various projections over time per W&C request	1.0
11/18/2025	JA	Review documents produced and draft of questions for upcoming Debtor depositions	1.3
11/19/2025	JA	Review data room and identify certain projections version per W&C request	0.6
11/19/2025	JA	Review data room and identify supporting documents re uptier transaction and capital structure changes in Q1 2025	1.0
11/19/2025	JA	Review Plan Supplement and analyze contract rejections	1.0
11/19/2025	JA	Review relevant documents and draft questions for Jamal deposition	1.3
11/19/2025	JT	Revised analysis of FY26 NWC projections by balance sheet line item	1.1
11/19/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/20/2025	JA	Analyze various GUC cashout scenarios	0.5
11/21/2025	CH	Draft analysis re: postpetition operating receipts received to date	1.4
11/21/2025	CH	Research re: Matrix JV ownership	0.4
11/21/2025	JA	Analyze legal entity org structure and legal entity trial balance to support UCC motions	0.7
11/21/2025	JA	Review post petition cash generated and other related analysis for W&C	1.2
11/21/2025	JA	Review rights offering calculations	0.5
11/23/2025	JA	Analyze Plan documents and develop supporting scenarios to support Confirmation objection	1.3
11/24/2025	JA	Analyze various settlement proposals and impact on recoveries	0.8
11/24/2025	JA	Revise supporting waterfall analysis under different Plan recoveries	1.3
11/24/2025	JA	Review various claims and causes of action listed re Plan Settlement	0.6
11/25/2025	CH	Analyze scheduled and statement filings re: causes of action identified as assets	0.5
11/25/2025	JA	Draft supporting schedules for various financial statements in Plan objection motion	0.6
11/25/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/26/2025	JA	Analyze insurance related obligations	0.5
Total Professional Hours			**89.6**

AlixPartners

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.9	$	2,774.00
Kathryn B McGlynn	$1,415	1.2		1,698.00
Joel Amico	$1,150	50.8		58,420.00
Matthew D Gates	$1,120	6.0		6,720.00
Ryan Komendowski	$1,080	0.4		432.00
John Tutty	$950	15.6		14,820.00
Thomas G Prince	$950	5.7		5,415.00
Christopher Cuomo	$910	0.3		273.00
Chase Hood	$850	7.1		6,035.00
Lisa Marie Bonito	$580	0.6		348.00
Total Professional Hours and Fees		**89.6**	**$**	**96,935.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	DM	Review ModivCare Debtors' motion for exit financing	0.3
11/05/2025	JA	Review W&C motion and assist with providing various financial inputs	1.5
11/10/2025	JA	Analyze motion to employ real estate advisor and related follow up diligence	0.9
11/10/2025	JA	Review draft of UCC standing motion and provide comments	0.6
11/11/2025	JA	Analyze certain preference actions and other disclosures made in the Statement of Financial Affairs	1.2
11/21/2025	JA	Review confirmation objection draft and provide comments	1.1
11/23/2025	JA	Review and provide comments on confirmation objection and prepare supporting backup	0.8
11/24/2025	JA	Draft supporting financial schedules for Plan objection	1.6
11/24/2025	JA	Review and provide comments on confirmation objection	2.5
11/25/2025	JA	Review and provide comments to Plan objection motion	2.5
Total Professional Hours			**13.0**

AlixPartners

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Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Joel Amico	$1,150	12.7		14,605.00
Total Professional Hours and Fees		**13.0**	**$**	**15,043.00**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	RK	Prepare deposition questions for upcoming former CFO deposition.	2.7
11/03/2025	CR	Analyze post-petition financial information related to revenue and receivables.	0.5
11/03/2025	CR	Assist counsel with preparation for Gutierrez deposition.	1.3
11/03/2025	CR	Meeting with C. West, A. Chase, and L. Miranda (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of uptier transaction	0.4
11/03/2025	DM	Review and add to draft lists of questions for ModivCare management meeting and Guitterez deposition	0.4
11/03/2025	DM	Provide comments on revised draft Magrisi report re: ModivCare business plan	0.7
11/03/2025	JT	Meeting with C. West, A. Chase, and L. Miranda (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of uptier transaction	0.4
11/03/2025	JT	Revise analysis of uptier transaction based on historical pricing data	2.4
11/04/2025	CR	Assist counsel with preparation for Scott Kern deposition.	1.3
11/05/2025	CR	Attend Barbara Gutierrez deposition	2.8
11/05/2025	DM	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	DM	Review draft standing motion re: ModivCare lien challenge	0.8
11/05/2025	ESK	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	GM	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	JT	Draft questions for K. Shepard disposition	0.7
11/05/2025	RK	Preparation and review of deposition questions.	1.8
11/06/2025	CR	Attend Scott Kern deposition	3.0
11/06/2025	DM	Analyze various surety bond and exit financing issues	1.3
11/06/2025	DM	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Expert Report	0.4
11/06/2025	DM	Provide comments on Magrisi report	0.8
11/06/2025	JL	Prepare questions/topics for consideration in management depositions	0.4
11/07/2025	DM	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	DM	Review and comments on Magrisi expert report	3.5
11/07/2025	DM	Review revised Magrisi expert report	0.7
11/07/2025	ESK	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	GM	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	JL	Review and edit questions/topics for deposition	0.5
11/07/2025	MDG	Provide additional information re: lien challenge motion	2.0
11/08/2025	DM	Review C. Shore comments to Magrisi expert report	0.8
11/08/2025	DM	Review email with attachment from G. Magrisi re: draft questions for K. Shepard deposition	0.4
11/09/2025	DM	Review revised Magrisi expert report	1.1
11/10/2025	AP	Attend Ken Shepard deposition	2.9
11/10/2025	CR	Attend the deposition of Ken Shepard	8.0
11/10/2025	DM	Discussion with D. MacGreevey, G. Magrisi (AlixPartners) re: Magrisi report	0.2

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	DM	Emails with E. Kardos and G. Magrisi (AlixPartners) re: distribution of Magrisi report	0.3
11/10/2025	DM	Review and comments on M. Brown report re: ModivCare valuation	1.2
11/10/2025	DM	Review and comments on Magrisi expert report re: ModivCare business plan	1.6
11/10/2025	DM	Review Magrisi expert ModivCare report for expenses discussion	0.5
11/10/2025	GM	Attend Ken Shepard deposition	2.5
11/10/2025	JA	Attend Ken Shepard deposition	2.5
11/11/2025	AP	Attend Heath Sampson, CEO of Modivcare deposition	5.0
11/11/2025	CR	Attend Heath Sampson, CEO of Modivcare deposition	3.0
11/11/2025	JA	Attend Heath Sampson, CEO of Modivcare deposition	2.3
11/11/2025	JT	Correspond with D. Litz (W&C) re: make whole event	0.4
11/11/2025	JT	Develop an estimate for the total cost of triggering the Make-Whole Event of the credit agreement	0.7
11/11/2025	JT	Develop charts to summarize historical trading prices of the company's unsecured notes	0.6
11/11/2025	RK	Prepare questions for upcoming depositions.	1.7
11/12/2025	CH	Review draft motion lien challenge standing motion and related complaint	1.2
11/12/2025	CR	Analyze market data related to uptier collateral valuation.	1.8
11/12/2025	CR	Uptier damages analysis for draft complaint and standing motion.	1.7
11/12/2025	DM	Analyze market for LME's from 2020 to 2025 re: ModivCare uptier	2.0
11/12/2025	JT	Correspond with E. Smith (W&C) re: unsecured notes	0.3
11/12/2025	JT	Review the company's Q1 2025 10-Q filing for disclosures re: incremental term loan proceeds	0.5
11/12/2025	JT	Revised chart to summarize trading prices of the 2L notes	0.6
11/12/2025	JT	Revised chart with the company's debt balances as of the uptier transaction and petition dates	0.9
11/12/2025	TGP	Review transcript of K. Sheppard deposition	0.7
11/13/2025	CR	Attend Daniel SIlvers deposition	8.0
11/13/2025	DM	Review draft UCC standing motion and complaint re: ModivCare lien challenge	0.9
11/13/2025	JA	Attend Daniel SIlvers deposition	2.0
11/13/2025	JT	Corresponded with D. Kiyosaki (FTI) re: Wells Fargo control account	0.3
11/13/2025	JT	Corresponded with L. Miranda (W&C) re: proceeds from incremental term loan	0.3
11/13/2025	JT	Review files related to incremental term loan for detail on the Wells Fargo controlled account	1.1
11/13/2025	JT	Review sources and uses excel detail of proceeds from the incremental term loan	0.4
11/13/2025	KBM	Review litigation related updates	0.4
11/13/2025	TGP	Review draft lien challenge complaint	0.6
11/13/2025	TGP	Review draft lien challenge standing motion	0.7
11/14/2025	AP	Attend David Mounts Gonzales deposition	5.8
11/14/2025	CR	Prepare analysis re: counsel (W&C) requests related to uptier valuation in connection with related standing motion and complaint.	1.7
11/14/2025	CR	Attend David Mounts Gonzales deposition	5.0
11/14/2025	CR	Review draft complaint and standing motion related to uptier challenge.	1.3
11/14/2025	DM	Attend David Mounts Gonzales deposition	4.9
11/14/2025	DM	Review standing motion and complaint	0.3

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/14/2025	DM	Review 11.13.25 letter from AI Catalyst to UST	0.2
11/14/2025	DM	Review and comments on draft questions for Jamal and Shandler depositions	0.3
11/14/2025	DM	Review draft standing motion and complaint re: ModivCare uptier transaction	0.6
11/14/2025	JA	Attend David Mounts Gonzales deposition	2.0
11/14/2025	KBM	Review UCC lien challenge adversary complaint	0.9
11/14/2025	KBM	Review UCC's lien challenge standing motion	1.1
11/17/2025	AP	Attend Kevin Glodowski, First Lien Holders deposition	5.8
11/17/2025	CR	Assist counsel (W&C) with diligence requests in preparation for the Jamal (Moelis) deposition.	1.5
11/17/2025	CR	Assist counsel (W&C) with diligence requests in preparation for the Shandler (FTI) deposition.	1.8
11/17/2025	CR	Listen to Leslie Norwalk (Board member) deposition	3.8
11/17/2025	DM	Attend Kevin Glodowski, First Lien Holders deposition	5.2
11/17/2025	DM	Review emails with B. Marks (Latham), J. Zakia, C. Shore (W&C), J. Amico and G. Magrisi re: Magrisi reliance materials	0.3
11/17/2025	JA	Attend Leslie Norwalk (Board member) deposition	1.4
11/17/2025	JA	Attend Kevin Glodowski, First Lien Holders deposition	1.2
11/18/2025	CR	Assist counsel (W&C) with preparation for M. Brown (AlixPartners) deposition.	1.8
11/18/2025	CR	Draft discussion topics for counsel in connection with Jamal (Moelis) deposition preparation.	1.8
11/18/2025	CR	Draft analysis re: Q1-2025 uptier transactions.	2.3
11/19/2025	AP	Attend Chad Shandler (FTI), CTO deposition	5.8
11/19/2025	CR	Assist counsel (W&C) with preparation of outline for Jamal (Moelis) deposition.	1.8
11/19/2025	CR	Listened to Chad Shandler (FTI) deposition.	3.0
11/19/2025	CR	Listened to Chad Shandler (FTI) deposition.	3.5
11/19/2025	DM	Partial attendance at deposition of C. Shandler (FTI) as ModivCare 30b6 witness	2.2
11/19/2025	DM	Review 11.18.25 letters from W&C to Quinn and Latham	0.4
11/19/2025	JA	Participate in the Shandler deposition	1.2
11/20/2025	AP	Attend Zul Jamal Moelis deposition	2.9
11/20/2025	CR	Financial analysis related to standing motion and complaint.	1.5
11/20/2025	CR	Listened to Zul Jamal (Moelis) deposition.	3.5
11/20/2025	CR	Listened to Zul Jamal (Moelis) deposition.	3.0
11/20/2025	DM	Partial attendance at deposition of Z. Jamal (Moelis) as ModivCare 30b6 witness	4.4
11/20/2025	JA	Attend Zul Jamal Moelis deposition	1.5
11/20/2025	JL	Continue participation in G. Magrisi deposition prep	1.4
11/20/2025	JL	Attend Zul Jamal Moelis deposition	1.3
11/21/2025	AP	Attend Marc Brown deposition re: valuation expert report	8.0
11/21/2025	CR	Assist counsel (W&C) with M. Brown (AlixPartners) deposition preparation.	2.0
11/21/2025	CR	Attend Marc Brown deposition re: valuation expert report	6.0
11/21/2025	MB	Participate in Marc Brown deposition re: valuation expert report	6.4
11/21/2025	RK	Update recovery analysis scenarios for confirmation objection.	0.9
11/21/2025	SC	Attend Marc Brown deposition re: valuation expert report	2.8
11/22/2025	RK	Update recovery analysis scenarios for confirmation objection.	2.6
11/22/2025	RK	Continue to update recovery analysis scenarios for confirmation objection.	2.7
11/24/2025	AP	Attend Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.8

AlixPartners

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/24/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.5
11/24/2025	GM	Participate in Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.5
11/24/2025	JL	Attend Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.1
11/24/2025	KBM	Review supplement to lien support challenge	0.3
11/24/2025	SC	Attend deposition of Greg Magrisi	8.0
11/25/2025	AP	Review transcript of deposition of Greg Magrisi (AlixPartners) re: Magrisi analyses and opinions in the Magrisi rebuttal report on Debtors' business plan and projections	1.4
11/25/2025	DM	Attend D. Rowe (Jupiter) deposition	0.2
11/25/2025	DM	Review revised draft ModivCare confirmation objection	0.8
11/26/2025	AP	Attend David Mounts Gonzalez, former Modivcare Board member deposition	2.5
11/26/2025	AP	Review transcript of deposition of Greg Magrisi (AlixPartners) re: analyses and opinions in the Magrisi rebuttal report on Debtors' business plan and projections	2.9
11/26/2025	AP	Review transcripts from deposition of Marc Brown (AlixPartners), Chad Shandler (FTI), Ken Shepard (ModivCare), and Heath Sampson(ModivCare) re: Debtors' business plan and projections, Q1 transactions, and rebuttal of Debtors' valuation expert report	2.9
11/26/2025	DM	Discussion with M. Jacques re: prior work with Mounts Gonzales	0.2
11/26/2025	DM	Partial attendance at continued deposition of David Mounts Gonzales	1.1
Total Professional Hours			**259.5**

AlixPartners

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	40.9	$	59,714.00
Kathryn B McGlynn	$1,415	2.7		3,820.50
Marc Brown	$1,415	6.4		9,056.00
Greg Magrisi	$1,250	13.7		17,125.00
Christopher Rubel	$1,225	77.1		94,447.50
Johnny Lee	$1,225	10.7		13,107.50
Elizabeth S Kardos	$950	2.2		2,090.00
Ashutosh Panda	$1,150	53.7		61,755.00
Joel Amico	$1,150	14.1		16,215.00
Matthew D Gates	$1,120	2.0		2,240.00
Ryan Komendowski	$1,080	12.4		13,392.00
John Tutty	$950	9.6		9,120.00
Thomas G Prince	$950	2.0		1,900.00
Susan Clark	$910	10.8		9,828.00
Chase Hood	$850	1.2		1,020.00
Total Professional Hours and Fees		**259.5**	**$**	**314,830.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	MDG	Analyze claims data and related analysis	1.7
11/03/2025	TGP	Analyze the Debtors' claims pool	1.1
11/05/2025	CH	Draft correspondence to D. MacGreevey (AlixPartners) re: claims analysis and related assumptions	0.8
11/05/2025	CH	Draft updates to claims analysis to incorporate comments from D. MacGreevey (AlixPartners)	1.9
11/05/2025	CH	Review individual claim filings in connection with revised claims analysis	1.1
11/05/2025	JA	Analyze claims filed, scheduled and related analysis	1.2
11/05/2025	JL	Review claim filings and research background of claim amounts for large claims	0.8
11/05/2025	KBM	Review updates re: claims and waterfall analysis	0.4
11/05/2025	TGP	Analyze the Debtors' claims pool	1.3
11/06/2025	CH	Analyze proposed contract cure cost and related estimated claims	1.7
11/06/2025	CH	Convert contract assumption and cure cost schedule to excel format	0.8
11/07/2025	JA	Review intercompany matrix and various claims	1.3
11/10/2025	JA	Analyze various unsecured claims filed in case	1.0
11/14/2025	JA	Review various unsecured claims filed and scheduled and diligence of GUC claims analysis	1.0
11/18/2025	JA	Analyze filed claims, scheduled claims and debtors claims analysis to determine GUC pool	1.3
11/19/2025	CH	Analyze contract rejection schedule and related claims exposure	1.8
11/20/2025	CH	Analyze contract and customer claims by Debtor entity	1.1
11/20/2025	CH	Analyze litigation claims by Debtor entity	1.5
11/20/2025	CH	Analyze trade claims by Debtor entity	1.8
11/20/2025	CH	Call with J. Amico and C. Hood (AlixPartners) re: claims analysis	0.5
11/20/2025	JA	Call with J. Amico and C. Hood (AlixPartners) re: claims analysis	0.5
11/20/2025	JA	Call with V. Sachdev (W&C), J. Amico and C. Hood (AlixPartners) re: claims analysis	0.3
11/20/2025	JA	Review claims register and perform analysis of GUC claims	1.0
11/21/2025	CH	Analyze revised claims register received from Verita for new and updated claims	1.6
11/21/2025	KBM	Review updates re: GUC claims pool	0.4
11/23/2025	CH	Analyze 2L claim components	0.4
11/23/2025	JA	Analyze various claims estimates and reconciliations for UCC objection	1.1
11/24/2025	CH	Draft analysis re: unsecured claims for voting purposes	1.7
11/24/2025	JA	Analyze general unsecured claims estimate and range of outcomes under the cash out option	0.6
11/24/2025	JA	Call with J. Amico, C. Hood (AlixPartners), A. Zatz and others (W&C) re: unsecured claims analysis	0.4
11/24/2025	KBM	Review updated GUC analysis	0.3
11/25/2025	CH	Draft updates to claims analysis to incorporate claims objections to date	0.7
11/25/2025	CH	Review first omnibus claim objection filed	0.4
Total Professional Hours			**33.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	1.1	$	1,556.50
Johnny Lee	$1,225	0.8		980.00
Joel Amico	$1,150	9.7		11,155.00
Matthew D Gates	$1,120	1.7		1,904.00
Thomas G Prince	$950	2.4		2,280.00
Chase Hood	$850	17.8		15,130.00
Total Professional Hours and Fees		**33.5**	**$**	**33,005.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	MW	Review warrant valuation methodology/calculations.	1.0
11/03/2025	CR	Draft and reviewed valuation expert report.	1.8
11/03/2025	JA	Review and provide comments on valuation expert report	1.0
11/03/2025	KBM	Review draft valuation report	0.9
11/03/2025	MB	Analyze Jamal report	2.1
11/03/2025	MR	Perform analysis of ModivCare valuation metrics over time.	2.8
11/03/2025	MR	Perform analysis of public company credit metrics for ModivCare valuation.	2.6
11/03/2025	RK	Review debtors plan documentation for waterfall analysis.	2.7
11/03/2025	RK	Sensitize waterfall analysis for counsel questions.	1.3
11/04/2025	CR	Draft and reviewed valuation expert report.	1.8
11/04/2025	DM	Review and comments on Brown ModivCare expert report	0.8
11/04/2025	JT	Prepare historical debt pricing data for company peers	0.8
11/04/2025	JT	Develop a summary of the identified difference in FY26 use of net working capital within the company's valuation model	2.4
11/04/2025	JT	Revised slides in valuation model deck based on comments received	2.8
11/04/2025	MB	Analyze Jamal report	1.7
11/04/2025	MB	Conducted valuation analysis	2.6
11/04/2025	MB	Review industry research	0.9
11/04/2025	MR	Edit analysis of ModivCare cost of capital.	1.7
11/04/2025	MR	Prepare draft expert report re: ModivCare valuation.	2.5
11/04/2025	MW	Analyze warrant valuation methodology and calculations	0.5
11/04/2025	RK	Prepare expert rebuttal report of valuation.	3.0
11/04/2025	RK	Review document produced for valuation analysis.	2.6
11/05/2025	CR	Review and drafted valuation expert report.	1.2
11/05/2025	CA	Perform review and quality control analysis of discounted cash flow analysis	0.6
11/05/2025	CA	Perform review and quality control analysis of guideline company method valuation analysis and underlying data	2.2
11/05/2025	CA	Perform review and quality control analysis of guideline transaction method valuation analysis and underlying data	2.5
11/05/2025	MB	Draft expert report	0.9
11/05/2025	MB	Review liquidation analysis	0.4
11/05/2025	MR	Perform quality review of draft expert report re: ModivCare valuation.	2.9
11/05/2025	RK	Review business plan rebuttal report.	2.1
11/06/2025	CR	Review and drafted valuation expert report.	1.7
11/06/2025	CA	Perform review and quality control analysis of weighted-average cost of capital analysis	0.9
11/06/2025	CA	Prepare list of documents considered in valuation report	0.8
11/06/2025	DM	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	DM	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	JA	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	JA	Draft supporting slides for surety and cash collateral re valuation materials	1.2

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	JA	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	MB	Draft valuation report	2.2
11/06/2025	MB	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	MR	Perform quality review of ModivCare valuation analysis.	2.1
11/06/2025	MR	Perform research re: healthcare industry trends for ModivCare valuation analysis.	0.9
11/06/2025	MR	Prepare draft expert report re: ModivCare valuation.	1.7
11/06/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	RK	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	RK	Review underlying LC assumptions used to support the Moelis recovery analysis.	2.4
11/07/2025	CA	Perform review and quality control of valuation expert report	2.3
11/07/2025	CA	Review the Jamal report and other referenced materials in valuation expert report	1.8
11/07/2025	JA	Review and provide comments on revised valuation materials	1.2
11/07/2025	KBM	Review updates re: valuation expert report	0.4
11/07/2025	MB	Draft valuation report	1.1
11/07/2025	MB	Review business plan report	2.1
11/07/2025	MB	Review valuation analysis	1.9
11/07/2025	MR	Perform quality review of ModivCare valuation analysis.	0.9
11/07/2025	MR	Prepare draft expert report re: ModivCare valuation.	2.0
11/07/2025	RK	Analyze letters of credit and surety bonds for recovery analysis.	2.0
11/07/2025	RK	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	RK	Update recovery analysis rebuttals for adjustments to valuation analysis.	2.2
11/08/2025	MB	Draft valuation report	1.1
11/08/2025	RK	Prepare expert rebuttal report for valuation analysis.	2.5
11/08/2025	RK	Sensitize recovery analysis for counsel assumptions.	2.7
11/09/2025	KBM	Review updates re: valuation expert report	0.4
11/09/2025	RK	Finalize valuation analysis for rebuttal report.	1.2
11/09/2025	RK	Prepare rebuttal report exhibits.	1.8
11/09/2025	RK	Prepare expert rebuttal report for valuation analysis.	3.0
11/10/2025	CA	Finalization and review of the Brown valuation expert report	2.6
11/10/2025	CA	Review updates to the draft valuation expert report	0.5
11/10/2025	KBM	Review final valuation expert report	0.9
11/10/2025	MB	Draft valuation report	3.4
11/10/2025	MB	Review ModivCare financial data	0.6
11/10/2025	MB	Review valuation analysis	1.7
11/10/2025	MR	Finalize expert report re: ModivCare valuation.	2.3
11/10/2025	MR	Perform quality review of draft expert report.	2.6
11/10/2025	MR	Perform quality review of ModivCare valuation analysis for draft expert report.	3.0
11/10/2025	MR	Review supporting documents re: ModivCare valuation analysis.	0.8
11/10/2025	RK	Final review of valuation rebuttal analysis.	2.7

AlixPartners

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Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	RK	Finalize valuation analysis for rebuttal report.	3.0
11/10/2025	RK	Review business plan rebuttal report for valuation impacts.	1.9
11/10/2025	RK	Review recovery analysis sensitivity analysis.	2.1
11/11/2025	MB	Review valuation data	0.6
11/11/2025	MR	Prepare supporting documents used to prepare ModivCare valuation analysis for production.	0.7
11/11/2025	RK	Accumulation and transfer of reliance materials for the valuation rebuttal report.	1.1
11/12/2025	MB	Prepare for deposition	1.1
11/12/2025	MB	Review reliance materials	0.4
11/12/2025	MR	Review reliance materials for M. Brown (AlixPartners) Expert Report re: valuation.	2.5
11/12/2025	MR	Perform analysis re: market pricing of ModivCare debt.	1.5
11/12/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	1.9
11/12/2025	RK	Review ModivCare LME and Exit financing.	1.9
11/13/2025	MB	Review Modivcare SEC filings	1.4
11/13/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	1.2
11/13/2025	TGP	Review expert rebuttal report of M. Brown	1.1
11/14/2025	CA	Perform research of competitors at the request of the expert	0.4
11/14/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.5
11/17/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	MB	Review expert reports	2.1
11/17/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	MR	Analyze Jamal expert report to prepare for expert depositions.	2.2
11/17/2025	MR	Perform valuation analysis to prepare for expert deposition.	1.1
11/17/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.6
11/17/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	RK	Prepare expert for rebuttal valuation report.	1.9
11/17/2025	RK	Review plan supplement for recovery analysis adjustments.	2.5
11/17/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/18/2025	AP	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	GM	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	JL	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	MB	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	MB	Review expert reports	2.4
11/18/2025	MB	Review valuation model	1.3

AlixPartners

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Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	MR	Perform valuation analysis to prepare for expert deposition.	2.0
11/18/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.5
11/18/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	RK	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/19/2025	MB	Review expert reports	1.9
11/19/2025	MB	Review Modivcare bankruptcy filings	2.6
11/19/2025	MB	Review Moelis financial materials	0.8
11/19/2025	MR	Perform valuation analysis to prepare for expert deposition.	2.1
11/19/2025	RK	Prepare valuation rebuttal deposition.	3.0
11/20/2025	MB	Meeting with J. Zakia and E. Smith (W&C) re: deposition	1.9
11/20/2025	MB	Review expert reports	3.4
11/20/2025	MB	Review financial models	2.4
11/20/2025	MB	Review Modivcare SEC filings	1.4
11/20/2025	MB	Review Modivcare bankruptcy filings	1.8
11/20/2025	MR	Perform valuation analysis to prepare for expert deposition.	1.7
11/20/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.8
11/20/2025	MR	Review precedent transaction data to prepare for expert deposition.	0.9
11/20/2025	MR	Review public filings for selected publicly traded companies to prepare for expert deposition.	1.4
11/20/2025	RK	Prepare valuation rebuttal deposition.	2.0
11/21/2025	MB	Review expert report	0.9
11/21/2025	MR	Review valuation materials to prepare for expert deposition.	0.3
11/22/2025	CH	Analyze waterfall scenarios and illustrative recoveries	1.9
11/22/2025	CH	Draft email to R. Komendowski re: waterfall analysis	0.3
11/24/2025	MB	Prepare for confirmation hearing	0.7
11/24/2025	MR	Perform analysis of ModivCare valuation to prepare for confirmation hearing.	0.8
11/24/2025	RK	Prepare analysis for confirmation objection.	1.2
11/24/2025	RK	Review valuation report for confirmation objection.	1.0
11/25/2025	MB	Review confirmation brief	1.1
11/25/2025	MR	Perform research re: publicly traded company method to prepare for ModivCare confirmation hearing.	1.8
11/25/2025	RK	Review confirmation objection figures.	2.3
Total Professional Hours			**222.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.3	$	3,358.00
Kathryn B McGlynn	$1,415	2.6		3,679.00
Marc Brown	$1,415	53.8		76,127.00
Greg Magrisi	$1,250	0.5		625.00
Christopher Rubel	$1,225	8.4		10,290.00
Johnny Lee	$1,225	0.5		612.50
Ashutosh Panda	$1,150	0.5		575.00
Joel Amico	$1,150	4.9		5,635.00
Ryan Komendowski	$1,080	60.5		65,340.00
Matthew Root	$1,000	63.2		63,200.00
Matthew Wicker	$1,000	1.5		1,500.00
John Tutty	$950	6.0		5,700.00
Thomas G Prince	$950	1.1		1,045.00
Chase Hood	$850	2.2		1,870.00
Claire Allshouse	$810	14.6		11,826.00
Total Professional Hours and Fees		**222.6**	**$**	**251,382.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	CH	Review draft motion for standing	0.8
11/05/2025	CH	Review exit financing motion	0.4
11/06/2025	DM	Review presentation by ModivCare Debtors on ERO	0.4
11/07/2025	CH	Review exit facility outreach and competing proposals received	1.4
11/07/2025	KBM	Review exit facility proposals	0.9
11/08/2025	DM	Review presentation from ModivCare Debtors re: exit financing process and term sheets	0.6
11/10/2025	DM	Emails with attachments with J. Amico (AlixPartners) re: diligence of ModivCare exit financing process	0.3
11/12/2025	DM	Emails with J. Amico re: ModivCare exit financing process	0.2
11/17/2025	CH	Review plan supplements filed and related exhibits	1.8
11/17/2025	DM	Review ModivCare Plan supplement	1.5
11/18/2025	DM	Research re: exit financing work fees and expense reimbursement in comparable cases	0.7
11/18/2025	KBM	Review Plan Supplement	0.8
11/19/2025	DM	Assessment of email from A. Zatz (W&C) re: outline for confirmation objection	0.3
11/19/2025	DM	Emails with A. Zatz and B. Lingle (W&C) re: proposed ModivCare exit financing work fee and expense reimbursement	0.2
11/19/2025	KBM	Review confirmation objection related items	0.6
11/20/2025	TGP	Analyze the Debtors' Exit financing credit agreement	0.7
11/20/2025	TGP	Analyze the Debtors' New Warrants Agreement	0.9
11/20/2025	TGP	Analyze the Debtors' Plan Supplement	1.2
11/21/2025	CH	Analyze equity rights offering assumptions and value	1.3
11/21/2025	CH	Review equity rights offering procedures	0.6
11/21/2025	CH	Review initial draft of confirmation objection	0.7
11/23/2025	CH	Analyze GUC cashout recovery estimate	0.5
11/24/2025	DM	Provide comments on draft ModivCare confirmation objection	1.7
11/24/2025	KBM	Review changes to draft Confirmation objection	0.9
11/24/2025	KBM	Review second Plan supplement	0.4
11/25/2025	CH	Analyze latest settlement proposal from ad hoc group and estimated recovery value	0.6
11/25/2025	CH	Review and provide additional comments to further revised confirmation objection	1.4
11/25/2025	CH	Review second plan supplement re: retained causes of action	0.4
11/25/2025	CH	Revise and provide comments to revised confirmation objection	1.3
Total Professional Hours			**23.5**

AlixPartners

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Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.9	$	8,614.00
Kathryn B McGlynn	$1,415	3.6		5,094.00
Thomas G Prince	$950	2.8		2,660.00
Chase Hood	$850	11.2		9,520.00
Total Professional Hours and Fees		**23.5**	**$**	**25,888.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	DM	Review first supplemental declaration iso ModivCare retention	0.5
11/03/2025	KSM	Review updated proposed retention order	0.3
11/03/2025	LCB	Emails with G. Zahiremanmi (W&C), K. Sundt and J. Braverman (AlixPartners) re: filing of AlixPartners 1st Supplemental Declaration	0.3
11/04/2025	LCB	Review court docket for AlixPartners order	0.2
Total Professional Hours			**1.3**

AlixPartners

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Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Kaitlyn Sundt McClarren	$715	0.3		214.50
Laurie Capen Verry	$600	0.5		300.00
Total Professional Hours and Fees		**1.3**	**$**	**1,244.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	1.3
11/03/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	0.6
11/04/2025	KSM	Review first monthly fee application	0.4
11/04/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	0.8
11/04/2025	MDG	Review professional fees for September fee statement	0.7
11/04/2025	MDG	Review September 2025 monthly fee statement	0.6
11/05/2025	DM	Review ModivCare September monthly fee statement	0.5
11/05/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	0.4
11/05/2025	LMB	Correspondence to (W&C) attaching the First Monthly Fee Statement (September 2025) for filing on the Court docket	0.2
11/07/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.4
11/10/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	0.7
11/11/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.0
11/12/2025	LMB	Analyze professional fees for October 2025 Monthly Fee Statement for privilege and confidentiality	2.2
11/12/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	3.2
11/14/2025	LMB	Continue to prepare professional fees for October 2025 Monthly Fee Statement	3.2
11/14/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	3.4
11/20/2025	DM	Emails with E. Kardos (AlixPartners) re: ModivCare Lenders reservation of rights wrt/ UCC fees	0.2
11/20/2025	DM	Review ModivCare Lenders reservation of rights wrt/ UCC fees	0.2
Total Professional Hours			**23.0**

AlixPartners

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Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Matthew D Gates	$1,120	1.3		1,456.00
Kaitlyn Sundt McClarren	$715	0.4		286.00
Lisa Marie Bonito	$580	20.4		11,832.00
Total Professional Hours and Fees		**23.0**	**$**	**14,888.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	TGP	Analyze potential recoveries for creditors	2.2
11/04/2025	TGP	Analyze potential recoveries for creditors	2.4
11/05/2025	DM	Review draft ModivCare waterfall recovery slides	0.3
11/05/2025	RK	Sensitize waterfall analysis for updated valuation analysis.	1.9
Total Professional Hours			**6.8**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Ryan Komendowski	$1,080	1.9		2,052.00
Thomas G Prince	$950	4.6		4,370.00
Total Professional Hours and Fees		**6.8**	**$**	**6,860.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/19/2025	RK	Travel Geneva IL to New York, NY (attend deposition)	4.0
11/21/2025	MB	Travel from New York, NY to Chicago, IL (return from deposition)	2.3
11/24/2025	GM	Travel from home to Latham Boston (to attend deposition)	0.7
Total Professional Hours			**7.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
Marc Brown	$1,415	2.3		3,254.50
Greg Magrisi	$1,250	0.7		875.00
Ryan Komendowski	$1,080	4.0		4,320.00
Total Professional Hours and Fees		**7.0**	**$**	**8,449.50**
Less 50% Travel Fees				(8,890.00)
Total Professional Fees			**$**	**(440.50)**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
11/19/2025	Airfare Marc Brown 2025-11-19 ORD- LGA	128.48
11/19/2025	Airfare Ryan Komendowski 2025-11-19 ORD- LGA	280.98
11/19/2025	Lodging Ryan Komendowski Ritz Carlton Central Park, New York, NY 2025-11-19 2025-11-21 (two night stay)	1,500.00
11/19/2025	Lodging Marc Brown - Ritz Carlton Central Park, New York, NY 2025-11-19 2025-11-21 (two night stay)	1,500.00
11/19/2025	Individual Meal - Marc Brown - Breakfast	5.16
11/19/2025	Individual Meal - Marc Brown - Lunch	6.17
11/19/2025	Individual Meal - Ryan Komendowski - Breakfast	13.31
11/19/2025	Individual Meal - Ryan Komendowski - Lunch	60.00
11/19/2025	Group Meal - Marc Brown - Dinner - Ryan Komendowski; Marc Brown	160.00
11/20/2025	Taxi/Car Service Ryan Komendowski Hotel to LGA	124.52
11/20/2025	Taxi/Car Service Marc Brown LGA to Hotel	132.60
11/20/2025	Individual Meal - Marc Brown - Breakfast	21.32
11/20/2025	Individual Meal - Marc Brown - Lunch	31.68
11/21/2025	Airfare Ryan Komendowski 2025-11-21 LGA- ORD	171.64
11/21/2025	Airfare Marc Brown 2025-11-21 LGA- ORD	197.44
11/21/2025	Parking/Tolls Ryan Komendowski	134.45
11/21/2025	Taxi/Car Service Marc Brown Hotel to LGA	126.18
11/21/2025	Taxi/Car Service Ryan Komendowski LGA to Hotel	128.97
11/21/2025	Parking/Tolls Marc Brown	129.00
11/21/2025	Individual Meal - Ryan Komendowski - Breakfast	25.22
11/21/2025	Individual Meal - Ryan Komendowski - Lunch	28.02
11/21/2025	Individual Meal - Ryan Komendowski - Dinner	52.21
11/21/2025	Individual Meal - Marc Brown - Lunch	60.00
11/21/2025	Individual Meal - Marc Brown - Breakfast	40.00
11/24/2025	Taxi/Car Service Greg Magrisi Home to Latham office	24.12

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
11/24/2025	Taxi/Car Service Greg Magrisi Latham office to Home	28.73
11/24/2025	Individual Meal - Greg Magrisi - Breakfast	10.91
Total Expenses		**5,121.11**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Expenses		**Amount**
Airfare	$	778.54
Ground Transportation		828.57
Lodging		3,000.00
Meals		514.00
Total Expenses	**USD**	**5,121.11**

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

In re:	Chapter 11
MODIVCARE, INC., *et al.,*[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: January 29, 2026 @ 4:00 p.m. (CT)

FOURTH MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	12/1/2025	12/29/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$481,950.60 (80% of $602,438.25)	
Total expenses requested in this Fee Statement:	$16,839.23	
Total fees and expenses requested in this Fee Statement:	$498,789.83	
Blended hourly rate for professionals:	$1,087.04	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	49.9	$ 72,854.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	16.1	22,781.50
Marc Brown	Partner & Managing Director	$1,415	55.7	78,815.50
Greg Magrisi	Partner & Managing Director	$1,250	49.6	62,000.00
Christopher Rubel	Partner	$1,225	53.2	65,170.00
Johnny Lee	Partner	$1,225	3.7	4,532.50
Ashutosh Panda	Director	$1,150	31.4	36,110.00
Joel Amico	Director	$1,150	80.9	93,035.00
Ryan Komendowski	Director	$1,080	66.5	71,820.00
Matthew Root	Director	$1,000	49.7	49,700.00
Kaitlyn Sundt McClarren	Director	$715	0.6	429.00
John Tutty	Senior Vice President	$950	3.7	3,515.00
Thomas G Prince	Senior Vice President	$950	1.9	1,805.00
Christopher Cuomo	Senior Vice President	$910	0.4	364.00
Chase Hood	Senior Vice President	$850	68.1	57,885.00
Lucas Lovatto	Vice President	$835	1.0	835.00
Lisa Marie Bonito	Vice President	$580	21.8	12,644.00
Total Hours and Fees for Professionals			**554.2**	**$ 634,295.50**
Less: 50% Travel Fees				(31,857.25)
Total Fees for Professionals				**$ 602,438.25**
Less: 20% Holdback				(120,487.65)
Total Fees for Professionals Less Holdback				**$ 481,950.60**

Average Billing Rate **$ 1,087.04**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	3.2	$ 3,706.00
1.2	Meetings & Communication with UCC and Creditors	18.0	20,772.00
1.3	Prepare Committee Presentations	10.6	11,905.50
1.7	Liquidity and Cash Management	6.2	5,660.00
1.9	Business and Strategic Plan	39.5	47,320.00
1.11	Financial and Other Diligence	40.5	42,895.00
1.12	Other Motions and Related Objections	4.1	4,850.00
1.13	Litigation Support & Investigations	48.7	59,804.00
1.14	Claims Analysis	13.2	12,180.00
1.15	Valuation and Solvency Analysis	104.6	121,856.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	27.5	27,076.00
1.18	Court Hearings and Status Conferences	153.1	184,505.50
1.20	Fee Applications & Fee Statements	35.5	28,051.00
1.31	Travel Time	49.5	31,857.25
	Total Hours and Fees By Matter Category Before Holdback	**554.2**	**$ 602,438.25**

Average Billing Rate $ 1,087.04

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Expense Category	Amount
Airfare	$ 4,136.61
Ground Transportation	2,674.13
Lodging	8,797.53
Meals	1,230.96
Total Expenses	**$ 16,839.23**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this third monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from December 1, 2025 through December 29, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $602,438.25 and reimbursement of out-of-pocket expenses in the amount of $16,839.23 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $481,950.60 (80% of $602,438.25) and 100% of out-of-pocket expenses in the amount of $16,839.23 for a total amount of $498,789.83; and (iii) such other and further relief as this Court deems proper.

Dated: January 15, 2026

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
Total Professional Hours			**3.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.4	$	584.00
Kathryn B McGlynn	$1,415	0.4		566.00
Greg Magrisi	$1,250	0.4		500.00
Ashutosh Panda	$1,150	0.4		460.00
Joel Amico	$1,150	0.4		460.00
Ryan Komendowski	$1,080	0.4		432.00
Christopher Cuomo	$910	0.4		364.00
Chase Hood	$850	0.4		340.00
Total Professional Hours and Fees		**3.2**	**$**	**3,706.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CR	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	DM	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	DM	Communication with J. Zakia (W&C) re: ModivCare confirmation hearing	0.3
12/01/2025	JA	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	RK	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/03/2025	CH	Email correspondence with V. Sachdev (W&C) re: contract rejection analysis	0.4
12/03/2025	CH	Email correspondence with V. Sachdev (W&C) re: revised legal entity analysis	0.7
12/03/2025	CH	Review update from counsel re: status conference	0.2
12/04/2025	AP	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	CH	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	CR	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	CR	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	GM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/04/2025	GM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	RK	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	RK	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/05/2025	KBM	Review case updates and next steps re: Confirmation hearing from Committee Counsel	0.7
12/07/2025	CH	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	CH	Draft email to W&C re: plan voting and critical vendor payment analysis	0.8
12/07/2025	DM	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	JA	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	RK	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/08/2025	CH	Draft email to A. Zatz and V. Sachdev (W&C) re: claim voting analysis	0.8
12/09/2025	CH	Review update from counsel re: exit financing	0.2
12/18/2025	CH	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	DM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2025	GM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	JA	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
Total Professional Hours			**18.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.0	$	4,380.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Greg Magrisi	$1,250	1.2		1,500.00
Christopher Rubel	$1,225	1.5		1,837.50
Ashutosh Panda	$1,150	0.7		805.00
Joel Amico	$1,150	2.7		3,105.00
Ryan Komendowski	$1,080	2.2		2,376.00
Chase Hood	$850	4.8		4,080.00
Total Professional Hours and Fees		**18.0**	**$**	**20,772.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.3
12/03/2025	JA	Draft UCC weekly update materials	1.6
12/04/2025	KBM	Review weekly update presentation	0.7
12/10/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.3
12/15/2025	JA	Prepare summary slides on Plan for Committee	1.5
12/16/2025	DM	Review draft presentation to ModivCare UCC re: Plan recoveries	0.5
12/16/2025	JA	Draft of materials for Committee re recoveries under Plan	1.3
12/17/2025	DM	Review revised draft slides for ModivCare UCC re: Plan vs offered recoveries	0.5
12/17/2025	JA	Draft of materials for Committee re recoveries under Plan	1.2
12/18/2025	JA	Prepare for upcoming Committee meeting on Plan recoveries and next steps	0.7
Total Professional Hours			**10.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.0	$	1,460.00
Kathryn B McGlynn	$1,415	0.7		990.50
Joel Amico	$1,150	6.3		7,245.00
Chase Hood	$850	2.6		2,210.00
Total Professional Hours and Fees		**10.6**	**$**	**11,905.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Review intercompany matrix and transaction detail uploaded to dataroom	1.4
12/01/2025	CH	Review non-Debtor intercompany transaction detail uploaded to dataroom	0.9
12/01/2025	CH	Review variance and liquidity reporting package for week ended 11/23	0.8
12/01/2025	JA	Analyze UCC professional fee forecasts per Debtor requests	0.5
12/03/2025	JA	Review company cash reporting and evaluate go forward liquidity	0.8
12/07/2025	CH	Review first day motion reporting re: critical vendor payments and intercompany transactions	0.4
12/10/2025	CH	Review variance and liquidity reporting package for week ended 11/23	0.9
12/15/2025	CH	Review variance and liquidity reporting package for week ended 12/7	0.5
Total Professional Hours			**6.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
Joel Amico	$1,150	1.3	$	1,495.00
Chase Hood	$850	4.9		4,165.00
Total Professional Hours and Fees		**6.2**	**$**	**5,660.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	AP	Review of business plan rebuttal report in preparation for review with counsel	0.5
12/04/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	1.0
12/05/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	1.5
12/07/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	3.0
12/08/2025	AP	Prepare for expert testimony of Greg Magrisi re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/08/2025	CH	Draft analysis re: business plan forecast compared to actual performance	1.8
12/08/2025	GM	Business Plan Rebuttal Report Testimony preparation with counsel (all day preparation session)	11.0
12/08/2025	LL	Review top 20 customers contracts and synthesized terms and clauses re: risk sharing	1.0
12/09/2025	AP	Prepare for expert testimony of Greg Magrisi on cost and capex opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/09/2025	AP	Prepare for expert testimony of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/09/2025	GM	Business Plan Rebuttal Report Testimony preparation with counsel (all day preparation session)	11.0
Total Professional Hours			**39.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
Greg Magrisi	$1,250	27.5	$	34,375.00
Ashutosh Panda	$1,150	9.2		10,580.00
Chase Hood	$850	1.8		1,530.00
Lucas Lovatto	$835	1.0		835.00
Total Professional Hours and Fees		**39.5**	**$**	**47,320.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Review monthly operating reports and financial data for October	1.8
12/01/2025	JA	Review Debtor and UCC deposition transcripts re draft of follow up items	1.2
12/01/2025	JA	Review Debtors reporting re balance sheet and monthly operating reports re post petition payables	1.3
12/01/2025	JA	Review filing and historical documents re uptier transaction	1.2
12/01/2025	RK	Review uptier analysis considerations	1.3
12/02/2025	CH	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	CH	Review October trial balance and management financial reporting	1.3
12/02/2025	JA	Identification and draft of key open diligence requests	0.6
12/02/2025	JA	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	JA	Review and provide comments on various emails and other correspondence from W&C re info for confirmation hearing	1.1
12/02/2025	JA	Review data room re recent financial performance package	0.4
12/02/2025	JA	Review of monthly operating reports to derive recent operating performance	0.5
12/02/2025	JT	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	JT	Revised analysis of balance sheet and profitability by legal entity	1.8
12/03/2025	JA	Analyze filed monthly operating report reporting re recent performance and payments of prepetition claims	1.1
12/03/2025	JA	Analyze various outcomes of Plan confirmation and impact on recoveries	1.0
12/03/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/04/2025	JA	Analyze voting results and prepare summary based on vendors paid	1.3
12/04/2025	JA	Prepare for upcoming UCC Committee meeting	0.5
12/04/2025	JA	Review data room re historical recent financial performance and vendors classified as critical to pay prepetition claims	1.0
12/04/2025	RK	Review expert materials for upcoming trial.	2.7
12/05/2025	JA	Review debtors supplemental declaration: Jamal	0.7
12/05/2025	JA	Review debtors supplemental declaration: Shandler	0.8
12/05/2025	RK	Review expert materials for upcoming trial.	3.0
12/07/2025	CH	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/07/2025	JA	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/07/2025	JT	Analyze general unsecured claims cash out elections	1.1
12/07/2025	JT	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/08/2025	JA	Review and response to various requests from W&C re diligence for Confirmation hearing	1.0
12/09/2025	JA	Review and response to W&C diligence requests re Confirmation hearing	1.0
12/09/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/10/2025	CH	Review data room for detailed Debtor and non-Debtor org chart	0.4
12/10/2025	RK	Prepare demonstratives for conformation hearing.	2.6
12/11/2025	RK	Prepare documents for confirmation hearing.	2.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/23/2025	JA	Analyze revised warrant agreement	1.0
12/23/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/29/2025	JA	Analyze warrant agreement	1.0
12/29/2025	RK	Review updated warrant computation.	1.8
Total Professional Hours			**40.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS	FEES
Joel Amico	$1,150	17.5	20,125.00
Ryan Komendowski	$1,080	13.8	14,904.00
John Tutty	$950	3.7	3,515.00
Chase Hood	$850	4.3	3,655.00
Lisa Marie Bonito	$580	1.2	696.00
Total Professional Hours and Fees		**40.5**	**$ 42,895.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	JA	Review and provide comments on various motions re Confirmation hearing	0.8
12/04/2025	JA	Review and provide comments on various W&C drafts and analysis for confirmation hearing	1.5
12/05/2025	JL	Review and provide comments/speaking points related to Debtors plan support filings and rebuttal of expert report	1.8
Total Professional Hours			**4.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
Johnny Lee	$1,225	1.8	$	2,205.00
Joel Amico	$1,150	2.3		2,645.00
Total Professional Hours and Fees		**4.1**	**$**	**4,850.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CR	Draft direct testimony scripts and exhibits in preparation for trial.	3.2
12/02/2025	CR	Draft direct testimony scripts and related demonstratives in preparation for trial.	2.3
12/02/2025	CR	Valuation research in preparation for trial.	1.8
12/03/2025	CR	Developed Jamal cross exam points in preparation for trial.	1.5
12/03/2025	CR	Draft direct testimony script and related demonstratives in preparation for trial.	2.5
12/03/2025	CR	Review Jamal and Brown deposition transcripts in preparation for trial.	1.8
12/03/2025	CR	Review valuation expert reports in preparation for trial.	2.3
12/04/2025	CR	Draft direct testimony script and related demonstratives in preparation for trial.	2.8
12/04/2025	CR	Review and compiled cross examination points in preparation for trial.	1.3
12/04/2025	CR	Review deposition transcripts in preparation for trial.	1.5
12/04/2025	CR	Review valuation expert reports in preparation for trial.	1.8
12/05/2025	CR	Draft cross examination points in preparation for trial.	1.8
12/05/2025	CR	Draft direct testimony scripts and related demonstratives in preparation for trial.	2.3
12/05/2025	CR	Review deposition transcripts in preparation for trial.	1.3
12/05/2025	CR	Review valuation expert reports in preparation for trial.	1.3
12/05/2025	RK	Review documents produced for trial preparation.	2.3
12/08/2025	CR	Draft and reviewed direct testimony outlines and exhibits.	2.5
12/08/2025	CR	Review cross examination materials in preparation for expert testimony.	2.5
12/08/2025	DM	Working session with J. Amico and D. MacGreevey (AlixPartners) re: ModivCare confirmation recap and witness preparation	1.5
12/08/2025	JA	Working session with J. Amico and D. MacGreevey (AlixPartners) re: ModivCare confirmation recap and witness preparation	1.5
12/09/2025	CR	Assist with Brown expert testimony preparation.	1.8
12/09/2025	CR	Draft and review direct testimony materials.	2.3
12/09/2025	CR	Review cross examination materials in preparation for expert testimony.	1.8
12/09/2025	DM	Working session with J. Amico and D. MacGreevey (AlixPartners) re: confirmation preparation, Magrisi and Brown testimony and demonstratives	1.5
12/09/2025	JA	Working session with J. Amico and D. MacGreevey (AlixPartners) re: confirmation preparation, Magrisi and Brown testimony and demonstratives	1.5
Total Professional Hours			**48.7**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.0	$	4,380.00
Christopher Rubel	$1,225	40.4		49,490.00
Joel Amico	$1,150	3.0		3,450.00
Ryan Komendowski	$1,080	2.3		2,484.00
Total Professional Hours and Fees		**48.7**	**$**	**59,804.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Analyze mapping of legal entities and business units for claims	0.7
12/01/2025	CH	Draft analysis re: claims and material assets by legal entity	2.5
12/02/2025	CH	Analyze claim register and proofs of claim to map claims to legal entities	1.6
12/02/2025	CH	Draft analysis re: contract rejection claims and estimated claims exposure	0.7
12/02/2025	CH	Draft analysis re: estimated claims by legal entity	1.3
12/02/2025	CH	Draft analysis re: real estate lease rejection claims and estimated claims exposure	1.7
12/02/2025	CH	Draft updates to legal entity analysis to incorporate comments from J. Amico (AlixPartners)	0.6
12/02/2025	CH	Draft updates to legal entity claim analysis to incorporate revised claim estimates	0.6
12/02/2025	CH	Internal call with J. Amico, C. Hood (AlixPartners) re: claims analysis by legal entity	0.3
12/02/2025	JA	Analyze general unsecured claims and reconcile to evaluate various scenarios for Confirmation hearing	1.4
12/02/2025	JA	Internal call with J. Amico, C. Hood (AlixPartners) re: claims analysis by legal entity	0.3
12/03/2025	JA	Analyze various rejected claims and claims objections to determine impact on general unsecured claims class	1.5
Total Professional Hours			**13.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Joel Amico	$1,150	3.2	$	3,680.00
Chase Hood	$850	10.0		8,500.00
Total Professional Hours and Fees		**13.2**	**$**	**12,180.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	MB	Prepare for confirmation hearing	0.7
12/02/2025	MB	Prepare for confirmation hearing	0.6
12/02/2025	RK	Prepare expert materials for trial.	1.6
12/03/2025	MB	Review deposition transcripts	2.1
12/03/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	1.3
12/03/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.2
12/03/2025	RK	Prepare demonstratives for trial.	1.9
12/04/2025	MB	Prepare direct testimony	2.6
12/04/2025	MB	Review deposition transcripts	0.9
12/04/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	2.8
12/04/2025	MR	Perform valuation research re: selected publicly traded companies.	2.6
12/04/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.9
12/05/2025	MB	Analyze Jamal declaration	2.6
12/05/2025	MB	Review deposition transcript	0.8
12/05/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.5
12/05/2025	MR	Perform valuation research re: private company valuation discounts for ModivCare valuation.	2.5
12/05/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.0
12/06/2025	MB	Prepare for valuation rebuttal analysis testimony	1.7
12/06/2025	MB	Review deposition transcript	1.2
12/06/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	3.0
12/06/2025	MR	Prepare valuation materials to prepare for ModivCare confirmation hearing.	2.4
12/07/2025	MB	Review deposition transcript	1.4
12/07/2025	MB	Review valuation data	0.8
12/07/2025	MR	Prepare valuation materials to prepare for ModivCare confirmation hearing.	1.7
12/08/2025	MB	Prepare for direct testimony	2.3
12/08/2025	MB	Review expert reports	3.3
12/08/2025	MB	Review Medicare bankruptcy pleadings	1.4
12/08/2025	MB	Review rebuttal analysis	2.6
12/08/2025	MB	Review valuation support data	2.4
12/08/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.8
12/08/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	3.0
12/08/2025	MR	Perform valuation research re: selected publicly traded companies for hearing preparation.	2.3
12/08/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	0.9
12/08/2025	RK	Prepare with expert for confirmation trial testimony.	2.5
12/08/2025	RK	Review documents and analysis for confirmation trial.	3.0
12/09/2025	MB	Conduct rebuttal analysis	1.2
12/09/2025	MB	Prepare for confirmation hearing	1.0
12/09/2025	MB	Prepare trial demonstratives	1.3
12/09/2025	MB	Review deposition	1.1
12/09/2025	MB	Review expert reports	2.6
12/09/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.5
12/09/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	1.8
12/09/2025	MR	Perform valuation research re: precedent transactions for hearing preparation.	1.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/09/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.2
12/09/2025	RK	Finalization of trial demonstratives for valuation expert.	2.5
12/09/2025	RK	Prepare with expert for confirmation trial testimony.	2.6
12/10/2025	MB	Prepare for confirmation hearing	3.2
12/10/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	2.6
12/10/2025	MR	Prepare draft demonstratives for confirmation hearing closing.	1.6
12/10/2025	MR	Review Jamal Declaration to prepare for ModivCare confirmation hearing.	1.5
12/10/2025	RK	Assist counsel with preparation of closing demonstratives.	2.4
12/11/2025	MB	Conduct analysis for confirmation hearing	0.6
12/11/2025	MR	Prepare draft demonstratives for confirmation hearing closing.	1.0
Total Professional Hours			**104.6**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
Marc Brown	$1,415	38.4	$	54,336.00
Ryan Komendowski	$1,080	16.5		17,820.00
Matthew Root	$1,000	49.7		49,700.00
Total Professional Hours and Fees		**104.6**	**$**	**121,856.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/04/2025	CH	Review and provide comments to plan event scenario analysis	0.5
12/04/2025	CH	Review Debtors' certification of solicitation of votes and tabulation of ballots and related results	0.8
12/04/2025	CH	Review statement of consenting creditors in support of plan confirmation	0.7
12/05/2025	CH	Review C. Shandler declaration in support of plan confirmation	1.1
12/05/2025	CH	Review correspondence from counsel re: plan voting results	0.4
12/05/2025	CH	Review Debtors' brief in support of plan and objection to Committee standing motions	1.9
12/05/2025	CH	Review draft stipulation re: certification of voting results	0.3
12/05/2025	CH	Review Z. Jamal declaration in support of plan confirmation	1.3
12/05/2025	JA	Analyze Plan voting results and prepare summary schedules	0.8
12/05/2025	JA	Review lenders responses re UCC confirmation objection	1.3
12/05/2025	JA	Review various Debtor filings in support of Confirmation	1.5
12/05/2025	KBM	Review information re: voting results	0.7
12/05/2025	TGP	Analyze the Debtors' voting declaration and report	1.2
12/05/2025	TGP	Review analysis of voting results	0.7
12/07/2025	CH	Draft analysis re: plan voting and critical vendor payments	1.7
12/07/2025	CH	Review draft UCC standing motion reply	0.4
12/07/2025	CH	Review revised stipulation re: certification of voting results	0.3
12/08/2025	CH	Draft analysis re: voting results by class to adjust for satisfied and objected to claims	2.1
12/08/2025	CH	Review J. Lee direct demonstrative re: claim voting tabulation in advance of confirmation hearing	0.4
12/08/2025	KBM	Review Debtors' brief re: omnibus to Plan confirmation	0.9
12/08/2025	KBM	Review updates from Committee Counsel re: voting results	0.8
12/09/2025	RK	Review documents and analysis for confirmation trial.	2.6
12/10/2025	CH	Draft comparative analysis of exit facility proposal term sheets	1.4
12/10/2025	CH	Review latest exit facility term sheet received	0.5
12/11/2025	CH	Review supplemental voting tabulation and impact on plan approval	0.6
12/12/2025	DM	Review Debtors' documents in support of Plan	0.5
12/16/2025	CH	Review updated waterfall recovery analysis per the confirmed plan	0.6
12/18/2025	KBM	Review comparison of proposals compared to Plan	0.4
12/23/2025	CH	Review plan supplement re: warrants mechanics	0.6
12/23/2025	CH	Review update from counsel re: exit financing	0.3
12/29/2025	LMB	Review Effective Date Notice	0.2
Total Professional Hours			**27.5**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Kathryn B McGlynn	$1,415	2.8		3,962.00
Joel Amico	$1,150	3.6		4,140.00
Ryan Komendowski	$1,080	2.6		2,808.00
Thomas G Prince	$950	1.9		1,805.00
Chase Hood	$850	15.9		13,515.00
Lisa Marie Bonito	$580	0.2		116.00
Total Professional Hours and Fees		**27.5**	**$**	**27,076.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/03/2025	DM	Attend ModivCare status conference	0.5
12/03/2025	KBM	Attend ModivCare status conference	0.5
12/08/2025	AP	Attend testimony of Ken Shepard NEMT CFO of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/08/2025	AP	Attend testimony of Leslie Norwalk Board Chair of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/08/2025	CH	Attend confirmation hearing (remotely)	5.1
12/08/2025	CR	Attend trial proceedings in preparation for Brown and Magrisi testimony (remotely)	1.8
12/08/2025	DM	Attend ModivCare confirmation hearing and UCC breakout sessions	8.8
12/08/2025	JA	Attend Confirmation hearing (in person)	7.0
12/08/2025	JL	Prepare materials for Magrisi hearing testimony and support	1.3
12/08/2025	KBM	Attend confirmation hearing (partial)	2.7
12/08/2025	RK	Attend confirmation hearing	6.8
12/09/2025	AP	Attend testimony of Chad Shandler (FTI) CTO of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/09/2025	AP	Attend testimony of Zul Jamal (Moelis) Debtors' Valuation expert witness re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/09/2025	CH	Attend confirmation hearing (remotely)	5.2
12/09/2025	CR	Attend confirmation hearing (remotely) in preparation for Brown and Magrisi testimony.	2.5
12/09/2025	DM	Attend ModivCare confirmation hearing and UCC breakout sessions	8.5
12/09/2025	JA	Attend confirmation hearing (in person)	7.0
12/09/2025	KBM	Attend confirmation hearing (partial)	4.4
12/09/2025	MB	Attend afternoon session of confirmation hearing	3.0
12/09/2025	MB	Attend morning session of confirmation hearing	3.5
12/09/2025	RK	Attend confirmation hearing	6.3
12/10/2025	AP	Attend testimony of Greg Magrisi (AlixPartners) re: Mr. Magrisi's rebuttal report on Debtors' business plan and projections	2.9
12/10/2025	AP	Attend testimony of Marc Brown (AlixPartners) re: Mr. Brown's rebuttal report of Debtors' business plan and projections and Mr. Jamal's valuation	2.9
12/10/2025	CH	Telephonic attendance of confirmation hearing	4.5
12/10/2025	CR	Attend trial remotely.	7.0
12/10/2025	DM	(Partial) Attend ModivCare confirmation hearing and UCC breakout sessions	4.5
12/10/2025	GM	Provide business plan testimony at confirmation hearing	3.5
12/10/2025	GM	Business Plan Rebuttal Report Testimony preparation and review of relevant documents	2.5
12/10/2025	JA	Attend confirmation hearing (in person)	6.0
12/10/2025	MB	Attend morning session of confirmation hearing	3.3
12/10/2025	MB	Provide testimony at confirmation hearing	1.8
12/10/2025	RK	Attend bankruptcy court Confirmation hearing.	4.8
12/11/2025	AP	Attend confirmation hearing (remotely)	2.9
12/11/2025	CH	Attend confirmation hearing (remotely)	3.6
12/11/2025	DM	Attend confirmation hearing (remotely)	3.7
12/11/2025	JA	Attend Confirmation hearing closing arguments	3.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/11/2025	KBM	Attend Confirmation hearing	2.4
12/11/2025	RK	Attend Confirmation hearing closing arguments	3.5
12/12/2025	AP	Attend confirmation ruling (remotely)	0.8
12/12/2025	CH	Attend confirmation ruling (remotely)	0.5
12/12/2025	DM	Attend confirmation ruling (remotely)	0.5
12/12/2025	JA	Attend confirmation ruling (remotely)	0.3
12/12/2025	JL	Attend confirmation ruling (remotely)	0.6
12/12/2025	KBM	Attend confirmation ruling (remotely)	0.3
Total Professional Hours			**153.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	26.5	$	38,690.00
Kathryn B McGlynn	$1,415	10.3		14,574.50
Marc Brown	$1,415	11.6		16,414.00
Greg Magrisi	$1,250	6.0		7,500.00
Christopher Rubel	$1,225	11.3		13,842.50
Johnny Lee	$1,225	1.9		2,327.50
Ashutosh Panda	$1,150	21.1		24,265.00
Joel Amico	$1,150	24.1		27,715.00
Ryan Komendowski	$1,080	21.4		23,112.00
Chase Hood	$850	18.9		16,065.00
Total Professional Hours and Fees		**153.1**	**$**	**184,505.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	LMB	Analyze expenses for October 2025 monthly fee statement	0.8
12/02/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.2
12/02/2025	LMB	Prepare schedule/exhibit workbook for October 2025 Monthly Fee Statement	1.0
12/02/2025	LMB	Prepare Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	1.2
12/03/2025	DM	Review and comments on ModivCare October fee statement	0.7
12/03/2025	KSM	Review Second Monthly Fee Statement (October 2025)	0.3
12/03/2025	LMB	Revise Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	1.3
12/03/2025	LMB	Emails to/from D. MacGreevey (AlixPartners) re: October 2025 Monthly fee statement	0.2
12/03/2025	LMB	Finalize Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	0.4
12/03/2025	LMB	Email to D. Litz (W&C) attaching the Second Monthly Fee Statement (October 2025) for filing on the Court docket	0.2
12/04/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	2.5
12/08/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	3.2
12/09/2025	CH	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	2.2
12/09/2025	CH	Continue to analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.2
12/09/2025	LMB	Prepare fee application summary chart	0.4
12/11/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.5
12/12/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.8
12/15/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality compliance with U.S. Trustee standards	1.5
12/15/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	1.8
12/15/2025	LMB	Analyze expenses for November 2025 Monthly Fee Statement	0.8
12/16/2025	CH	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	0.9
12/16/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality compliance with U.S. Trustee standards	1.7
12/17/2025	CH	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	DM	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	JA	Analyze November Monthly Fee Statement for privilege and confidentiality; compliance with U.S. Trustee standards	1.3
12/17/2025	JA	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	LMB	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/17/2025	LMB	Prepare Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	2.0
12/18/2025	DM	Provide comments on ModivCare November monthly fee statement	0.6
12/18/2025	JA	Revise November Monthly Fee Statement	0.5
12/18/2025	KSM	Review Third Monthly Fee Statement (November 2025),	0.3
12/18/2025	LMB	Revise Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	0.8
12/18/2025	LMB	Finalize Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	0.5
12/18/2025	LMB	Email to D. Litz (W&C) attaching the Third Monthly Fee Statement (November 2025) for filing on the Court docket	0.2
12/19/2025	LMB	Revise Third Monthly Fee Statement (November 2025), supporting schedules and exhibits pursuant to comments from Counsel	0.4
12/23/2025	LMB	Update fee application summary chart	0.3
Total Professional Hours			**35.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Joel Amico	$1,150	8.5		9,775.00
Kaitlyn Sundt McClarren	$715	0.6		429.00
Chase Hood	$850	4.5		3,825.00
Lisa Marie Bonito	$580	20.4		11,832.00
Total Professional Hours and Fees		**35.5**	**$**	**28,051.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/07/2025	DM	Travel from NY to Houston, TX (attend ModivCare confirmation hearing	8.0
12/07/2025	GM	Travel from Boston to Houston, TX (attend ModivCare confirmation hearing	7.5
12/07/2025	JA	Travel from Buffalo, NY to Houston, TX (attend confirmation hearing	4.0
12/07/2025	RK	Travel from Chicago, IL to Houston, TX (attend trial)	3.3
12/08/2025	MB	Travel from Chicago, IL to Houston, TX (attend confirmation hearing	0.9
12/10/2025	DM	Travel from Houston, TX to Armonk, NY (return from confirmation hearing)	6.0
12/10/2025	GM	Travel from Houston, TX to Boston, MA (attend confirmation hearing)	7.0
12/10/2025	JA	Travel from Houston, TX to Buffalo, NY (return from confirmation hearing)	4.0
12/10/2025	MB	Travel from Houston, TX to Chicago, IL (return from confirmation hearing)	4.8
12/10/2025	RK	Travel from Houston TX to Chicago, IL (return from Court hearing)	4.0
Total Professional Hours			**49.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	14.0	$	20,440.00
Marc Brown	$1,415	5.7		8,065.50
Greg Magrisi	$1,250	14.5		18,125.00
Joel Amico	$1,150	8.0		9,200.00
Ryan Komendowski	$1,080	7.3		7,884.00
Total Professional Hours and Fees		**49.5**	**$**	**63,714.50**
Less 50% Travel Fees				(31,857.25)
Total Professional Fees			**$**	**31,857.25**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/07/2025	Airfare Greg Magrisi 2025-12-07 ORF- CLT	519.74
12/07/2025	Airfare Ryan Komendowski 2025-12-07 ORD- IAH	623.67
12/07/2025	Airfare Ashutosh Panda 2025-12-07 EWR- IAH	418.10
12/07/2025	Airfare Joel Amico 2025-12-07 BUF- HOU	642.18
12/07/2025	Taxi/Car Service Greg Magrisi Airport to Hotel	127.27
12/07/2025	Mileage Joel Amico 48 Miles from home to airport	33.60
12/07/2025	Taxi/Car Service Ashutosh Panda IAH Airport to Hotel in Houston	114.15
12/07/2025	Taxi/Car Service Ashutosh Panda Home in NJ to Ewr airport	200.44
12/07/2025	Lodging Greg Magrisi Four Seasons Hotel, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Lodging David MacGreevey - JW Marriott, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Lodging Joel Amico JW Marriott, Houston, TX 2025-12-07 2025-12-10	1,297.53
12/07/2025	Lodging Ashutosh Panda - JW Marriott, Houston, TX 2025-12-07 2025-12-11	2,000.00
12/07/2025	Lodging Ryan Komendowski - Four Seasons Hotel, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Individual Meal - Greg Magrisi - Lunch	31.02
12/07/2025	Individual Meal - Greg Magrisi - Dinner	23.40
12/07/2025	Individual Meal - Joel Amico - Dinner	24.40
12/07/2025	Individual Meal - Ryan Komendowski - Breakfast	5.07
12/07/2025	Individual Meal - Ryan Komendowski - Lunch	14.33
12/08/2025	Airfare Marc Brown 2025-12-08 ORD- IAH	419.49
12/08/2025	Taxi/Car Service David MacGreevey IAH Airport to Hotel	159.51
12/08/2025	Taxi/Car Service Greg Magrisi W&C office to Hotel	11.94
12/08/2025	Taxi/Car Service Greg Magrisi Hotel to W&C office	7.95
12/08/2025	Taxi/Car Service Joel Amico Houston airport to Hotel	54.00

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/08/2025	Taxi/Car Service Ryan Komendowski IAH to Hotel	93.12
12/08/2025	Lodging Marc Brown Four Seasons Hotel, Houston, TX 2025-12-08 2025-12-10	1,000.00
12/08/2025	Group Meal - David MacGreevey - Dinner - Joel Amico; David MacGreevey	150.00
12/08/2025	Individual Meal - Greg Magrisi - Dinner	75.00
12/08/2025	Individual Meal - Greg Magrisi - Breakfast	13.10
12/08/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	11.37
12/08/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/08/2025	Individual Meal - Marc Brown - Breakfast	9.43
12/08/2025	Individual Meal - Marc Brown - Breakfast	20.09
12/08/2025	Group Meal - Marc Brown - Dinner - Ryan Komendowski; Marc Brown	150.00
12/08/2025	Individual Meal - Ryan Komendowski - Breakfast	12.08
12/09/2025	Taxi/Car Service Greg Magrisi Hotel to W&C office	12.94
12/09/2025	Taxi/Car Service Marc Brown IAH to Hotel	179.35
12/09/2025	Individual Meal - Greg Magrisi - Dinner	75.00
12/09/2025	Individual Meal - Greg Magrisi - Breakfast	6.44
12/09/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	24.79
12/09/2025	Group Meal - David MacGreevey - Dinner - Joel Amico; David MacGreevey	150.00
12/09/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/09/2025	Individual Meal - Marc Brown - Dinner	75.00
12/09/2025	Group Meal - Ashutosh Panda - Lunch - Greg Magrisi; Ashutosh Panda	33.17
12/10/2025	Airfare Joel Amico 2025-12-10 IAH- BUF	526.58
12/10/2025	Airfare Marc Brown 2025-12-10 IAH- ORD	704.63
12/10/2025	Taxi/Car Service Greg Magrisi Boston to Home	72.41

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/10/2025	Taxi/Car Service Greg Magrisi Office to IAH	97.44
12/10/2025	Taxi/Car Service David MacGreevey Hotel to IAH Airport	145.97
12/10/2025	Taxi/Car Service Joel Amico Courthouse to Houston airport	68.42
12/10/2025	Taxi/Car Service Marc Brown Hotel to IAH	146.84
12/10/2025	Parking/Tolls Marc Brown	129.00
12/10/2025	Individual Meal - Greg Magrisi - Dinner	40.28
12/10/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	27.23
12/10/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/10/2025	Individual Meal - Joel Amico - Dinner	54.06
12/11/2025	Airfare Greg Magrisi 2025-12-11 IAH- BOS	282.22
12/11/2025	Taxi/Car Service David MacGreevey LGA Airport to Home	330.90
12/11/2025	Taxi/Car Service Joel Amico Buffalo Airport to Home	74.30
12/11/2025	Taxi/Car Service Ashutosh Panda Houston to IAH Airport	205.66
12/11/2025	Parking/Tolls Ryan Komendowski	165.00
12/11/2025	Taxi/Car Service Ryan Komendowski Hotel to IAH	58.79
12/11/2025	Individual Meal - Greg Magrisi - Dinner	14.23
12/11/2025	Group Meal - Ashutosh Panda - Lunch - Greg Magrisi; Ashutosh Panda	32.82
12/11/2025	Individual Meal - Ashutosh Panda - Dinner	34.47
12/11/2025	Individual Meal - Ryan Komendowski - Lunch	19.18
12/12/2025	Taxi/Car Service Ashutosh Panda EWR airport to Home NJ	185.13
Total Expenses		**16,839.23**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Expenses		**Amount**
Airfare	$	4,136.61
Ground Transportation		2,674.13
Lodging		8,797.53
Meals		1,230.96
Total Expenses	**USD**	**16,839.23**

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

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

WHITE & CASE LLP'S FOURTH MONTHLY FEE STATEMENT FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM DECEMBER 1, 2025 TO AND INCLUDING DECEMBER 29, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in the Cases:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	October 31, 2025 [Docket No. 616]	
	Beginning of Period	**End of Period**
Time period covered by this Statement:	December 1, 2025	December 29, 2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:		$2,491,640.00 (80% of $3,114,550.00)
Total reimbursable expenses requested in this Statement		$147,671.31
Total fees and expenses requested in this Statement (exclusive of 20% Holdback):		$2,639,311.31
Total fees and expenses requested in this Statement (inclusive of 20% Holdback):		$3,262,221.31
Summary of Attorney Fees Requested[2]		
Total attorney fees requested in this Statement:		$3,030,049.00
Total actual attorney hours covered by this Statement:		2,020.0
Average hourly rate for attorneys:		$1,500
Summary of Paraprofessional Fees Requested[3]		
Total paraprofessional fees requested in this Statement:		$84,501.00

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

[2] Includes staff attorneys.

[3] May include individuals who are admitted to the bar.

Total actual paraprofessional hours covered by this Statement:	172.3
Average hourly rate for paraprofessionals:	$490

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* ("Compensation Procedures Order") [Docket No. 500], each Notice Party (as defined therein) receiving notice of the Monthly Statement will have until 4:00 p.m. (prevailing Central Time) 14 days after the filing of the Monthly Statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay White & Case an amount of 80% of the fees and 100% of the expenses requested in the applicable Monthly Statement that are not objected to.

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, hereby files this monthly statement (this "Monthly Statement") for the period from December 1, 2025 to and including December 29, 2025 (the "Fee Period") requesting an aggregate amount of $2,639,311.31 for the Fee Period representing (a) interim allowance and payment of compensation for professional services to the Committee in the amount of $2,491,640.00, representing 80% of the $3,114,550.00 of fees earned by White & Case for professional services to the Committee during the Fee Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Fee Period in connection with such services in the amount of $147,671.31. Prior to filing this Monthly Statement, White & Case voluntarily elected to reduce its fees by 218.5 hours (~9.1%) and $289,172.00 (~8.5%) and its expenses by $4,065.86 (~2.7%), which White & Case will not hereafter seek payment.[4]

1. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by timekeeper (attorneys and paraprofessionals) is attached hereto as **Exhibit A**. A summary of White & Case's hours expended and fees earned during the Fee Period grouped by

[4] White & Case's final fee application will provide the aggregate amount of fees and expenses reduced by White & Case through the final review period.

project category is attached here to as **Exhibit B.** A detailed statement of White & Case's hours expended and fees earned during the Fee Period is attached hereto as **Exhibit C**. A summary of White & Case's expenses incurred for which reimbursement is sought grouped by category is attached hereto as **Exhibit D**. A detailed statement of White & Case's expenses incurred for which reimbursement is sought is attached hereto as **Exhibit E**.

2. White & Case attorneys and paraprofessionals expended a total of 2,192.3 hours in connection with the chapter 11 cases during the Fee Period. All services rendered by White & Case for which compensation is sought pursuant to this Monthly Statement were rendered solely to or on behalf of the Committee. No payments were received by White & Case from any source other than the Debtors for services rendered or to be rendered in connection with the chapter 11 cases.

3. Pursuant to the Compensation Procedures Order, any party objecting to this Monthly Statement shall serve via email to White & Case and each of the Notice Parties (defined in the Compensation Procedures Order) a written objection identifying with specificity the objectionable fees or expenses, including the amount of such objected-to fees or expenses, and the basis for such objection (the "Objection") on or before the objection deadline.

4. Upon expiration of the objection deadline, the Debtors are authorized to pay White & Case an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Statement that are not subject to an objection. If an Objection is timely served pursuant to the Compensation Procedures Order, the objecting party and White & Case shall attempt to resolve the objection on a consensual basis. If the parties reach an agreement, the Debtors shall promptly pay White & Case an amount equal to 80% of the agreed-upon fees and 100% of the agreed-upon

expenses. If the parties are unable to reach an agreement, then resolution will be governed as set forth in the Compensation Procedures Order.

5. Although White & Case has made every effort to include all fees earned and expenses incurred during the Fee Period, some fees and expenses might not be included in this Monthly Statement due to delays caused by accounting and processing during the Fee Period. White & Case reserves the right to make further statements or applications to this Court for allowance of such fees and expenses not included herein, which further statement will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and the Compensation Procedures Order.

January 26, 2026
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP
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- and -

WHITE & CASE LLP
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Email: gregory.pesce@whitecase.co

Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on January 26, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Summary of Hours and Fees by Timekeeper

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Abouhashish, Salma	Associate	2023	Pool Associates - Corporate	3.9	$870.00	$3,393.00
Aquije, Alonso	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	5.8	$1,110.00	$6,438.00
Beil, Ryan	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	33.1	$1,280.00	$42,368.00
Bourgault, Jacob	Associate	2025	Pool Associates - Corporate	118.2	$870.00	$102,834.00
Chase, Ashley	Associate	2016	Financial Restructuring & Insolvency (FRI) Practice	152.1	$1,580.00	$240,318.00
Chemborisov, Gleb	Litigation Specialist	N/A	Timekeeper Pool	2.0	$490.00	$980.00
Chen, Ken	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	1.9	$490.00	$931.00
Chitwan, Charu	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	154.2	$1,110.00	$171,162.00
Ericksen, A.J.	Partner	2005	Securities Practice	4.8	$2,200.00	$10,560.00
Fajar, Jimmy	Associate Director	N/A	Timekeeper Pool	1.4	$540.00	$756.00
Feld, Elizabeth	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	3.9	$1,790.00	$6,981.00
Galvan, Paolo	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	0.5	$420.00	$210.00
Greissman, Scott	Partner	1995	Financial Restructuring & Insolvency (FRI) Practice	75.6	$2,500.00	$189,000.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	43.1	$490.00	$21,119.00
Hong, Alice	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	95.8	$1,370.00	$131,246.00
Isaac, Chantal	Associate	N/A	Pool Associates - Corporate	45.4	$870.00	$39,498.00
Kakani, Bhavini	Associate	2025	Litigation Practice	65.9	$870.00	$57,333.00
Koster, Charles	Partner	2009	Financial Restructuring & Insolvency (FRI) Practice	49.6	$1,900.00	$94,240.00
Lingle, Barrett	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	27.4	$1,370.00	$37,538.00
Litz, Dominic	Associate	2018	Financial Restructuring & Insolvency (FRI) Practice	71.0	$1,370.00	$97,270.00
Ludovici, Stephen	Staff Attorney	2014	Financial Restructuring & Insolvency (FRI) Practice	19.5	$1,110.00	$21,645.00
Lupinacci, Frank	Partner	2008	M&A - Private Equity Practice	3.5	$1,900.00	$6,650.00
Mago, Don	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	15.3	$990.00	$15,147.00
Miranda, Loredana	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	125.4	$1,220.00	$152,988.00
Pados, Gyorgy	Associate Director	N/A	Timekeeper Pool	3.3	$540.00	$1,782.00
Pesce, Gregory	Partner	2011	Financial Restructuring & Insolvency (FRI) Practice	20.0	$2,100.00	$42,000.00
Quintana, Anastasia	Associate	N/A	Pool Associates - Litigation	42.8	$870.00	$37,236.00

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Sachdev, Varoon	Associate	2018	Financial Restructuring & Insolvency (FRI) Practice	57.2	$1,420.00	$81,224.00
Shore, Christopher	Partner	1992	Financial Restructuring & Insolvency (FRI) Practice	116.9	$2,500.00	$292,250.00
Silnicki, Graham	Associate	2013	Debt Finance Practice	0.6	$1,470.00	$882.00
Smith, Erin	Counsel	2014	Financial Restructuring & Insolvency (FRI) Practice	157.2	$1,630.00	$256,236.00
Venes, Aileen	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	37.0	$490.00	$18,130.00
Walz, Jacko	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	87.5	$870.00	$76,125.00
West, Colin	Partner	2008	Financial Restructuring & Insolvency (FRI) Practice	136.0	$1,790.00	$243,440.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	81.3	$490.00	$39,837.00
Yoo, Jade	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	106.5	$1,370.00	$145,905.00
Yu, Emily	Legal Assistant	N/A	Litigation Practice	1.8	$420.00	$756.00
Zahiremami, Golshid	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	47.8	$990.00	$47,322.00
Zakia, Jason	Partner	1999	Financial Restructuring & Insolvency (FRI) Practice	89.1	$2,200.00	$196,020.00
Zatz, Andrew	Partner	2008	Financial Restructuring & Insolvency (FRI) Practice	88.0	$2,100.00	$184,800.00
Grand Total				**2,192.3**		**$3,114,550.00**

Exhibit B

Statement of Hours and Fees by Project Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B01	Adversary Proceedings	8.80	$7,656.00
B02	Asset Analysis, Sale & Disposition	1.40	$2,660.00
B04	Case Administration	14.90	$8,221.00
B05	Case Strategy	33.40	$56,801.00
B06	Cash Management & Intercompany Issues	0.80	$1,432.00
B07	Claims Administration & Objections	2.50	$5,250.00
B08	Committee Meetings & Communications	7.90	$15,123.00
B09	Corporate, Securities & Regulatory Issues	8.40	$13,293.00
B12	Discovery	69.10	$76,246.00
B13	Exclusivity, Plan & Disclosure Statement	1,120.40	$1,468,002.00
B15	Hearings & Court Matters	472.20	$837,561.00
B16	Investigation of Causes of Action	382.90	$523,640.00
B19	Non-Working Travel	32.80	$57,826.00
B20	Professional Retention & Fees - W&C	34.60	$38,457.00
B21	Professional Retention & Fees - Other	2.20	$2,382.00
	Grand Total	**2,192.30**	**$3,114,550.00**

Exhibit C

Detailed Statement of Hours and Fees

WHITE & CASE

Official Committee of Unsecured Creditors of ModivCare Inc.
RE: Project Emcee

OUR REF: 1908759-0002

For professional services for the period ending 29 December 2025

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
Adversary Proceedings				
4 December 2025	Research evidentiary issues (2.4); Conduct further research & consolidate evidentiary research into argument (4.2); Meet with C. West & A. Hong re: new research task (1.0); Research director investigations (1.0); Review Gonzales documents for exhibit list (0.2).	J Bourgault	8.80	7,656.00
SUBTOTAL: Adversary Proceedings			**8.80**	**7,656.00**
Asset Analysis, Sale & Disposition				
23 December 2025	Review of new filing re: sale.	F Lupinacci	1.40	2,660.00
SUBTOTAL: Asset Analysis, Sale & Disposition			**1.40**	**2,660.00**
Case Administration				
1 December 2025	Update work in progress tracker.	D Mago	0.30	297.00
1 December 2025	Review docket and update case calendar (0.1); correspondence with transcript vendor (0.1); prepare share site for A. Aquije (0.1); Update exhibit list and folder with new documents (1.1).	K Wick	1.40	686.00
2 December 2025	Update work in progress email.	D Mago	0.30	297.00
2 December 2025	Obtain and send to G. Pesce contact information of US Trustee's attorney (0.1); pull and send to G. Pesce copy of Committee's appointment notice (0.1).	A Venes	0.20	98.00
2 December 2025	Review docket and update case calendar (0.8); update datasite folder (0.3); correspondence with vendor re: upcoming hearing materials (0.1); order hearing transcript (0.2); update list serv (0.1).	K Wick	1.50	735.00
3 December 2025	Update work in progress tracker.	L Miranda	0.20	244.00
3 December 2025	Update work in progress tracker.	D Mago	0.40	396.00
3 December 2025	Review and respond to emails with L. Miranda, A. Chase and A. Venes re: filing (0.1); file letter (0.1); electronically serve same (0.1); prepare and file transcript request form for November 21 hearing (0.1); email Judicial Transcribers re: same (0.1).	D Hirshorn	0.50	245.00
4 December 2025	Update work in progress tracker.	D Mago	0.20	198.00
5 December 2025	Pleadings file update.	A Venes	0.10	49.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
8 December 2025	Emails with Access Transcripts and Judicial Transcribers re: Confirmation Hearing transcripts (0.1); review and forward email from Chambers to J. Yoo, A. Chase, E. Smith and other members of W&C team re: motion to seal (0.1); prepare and file transcript request form (0.1); emails with L. Miranda re: hearing transcripts (0.2); emails with Judicial Transcribers re: same (0.3); confer with C. Chitwan re: same (0.2); Pull and de-duplicate legal authorities re: standing motion in preparation for closing for V. Sachdev (1.9); review and respond to emails with V. Sachdev re: same (0.1).	D Hirshorn	3.00	1,470.00
8 December 2025	Review docket and update case calendar.	K Wick	0.10	49.00
9 December 2025	Review and respond to emails with J. Yoo, A. Chase. A. Hong, L. Miranda and A. Venes re: upcoming filing (0.1); confer with C. Chitwan re: hearing transcript (0.1); confer with L. Miranda re: same (0.1); review and finalize notice of filing unopposed CX exhibit list (0.1); file same (0.1); electronically serve same (0.1); multiple emails with Judicial Transcribers and Court re: official transcript (0.3).	D Hirshorn	0.90	441.00
9 December 2025	Review/save recent case filings (0.1); update pleadings file (0.1).	A Venes	0.20	98.00
9 December 2025	Review docket for updates (0.1); circulate calendar invite for confirmation hearing (0.1); circulate hearing transcript (0.1).	K Wick	0.30	147.00
11 December 2025	Review and respond to emails with M. Henry of Judicial Transcribers re: hearing transcripts.	D Hirshorn	0.10	49.00
11 December 2025	Review case filings (0.2); update/reorganized pleadings files in shared drive and iManage (0.6).	A Venes	0.80	392.00
11 December 2025	Preparation of documents to courtroom for hearing (1.7); correspondence with J. Walz re: same (0.1).	E Yu	1.80	756.00
12 December 2025	Review and finalize Notice of Filing of the Official Committee of Unsecured Creditors' Closing Statement Demonstrative From the Confirmation Hearing (0.2); file same (0.1); electronically serve same (0.1).	D Hirshorn	0.40	196.00
12 December 2025	Review email from J. Yoo re: assistance with submission of closing demonstrative.	A Venes	0.10	49.00
15 December 2025	Review docket and update case calendar.	K Wick	0.10	49.00
16 December 2025	Draft meeting minutes for 11.25 (0.4) and 12.4 Committee meetings (0.2).	D Mago	0.60	594.00
16 December 2025	Review docket for updates.	K Wick	0.20	98.00
17 December 2025	Review docket and update case calendar.	K Wick	0.30	147.00
18 December 2025	Review docket and update case calendar (0.3);	K Wick	0.40	196.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	correspondence with W&C team re: hearing (0.1).			
23 December 2025	Review docket and update case calendar (0.3); correspondence with W&C team re: hearing (0.1).	K Wick	0.40	196.00
24 December 2025	Review docket and update case calendar.	K Wick	0.10	49.00
SUBTOTAL: Case Administration			**14.90**	**8,221.00**

Case Strategy

1 December 2025	All hands strategy call with W&C and Alix teams.	J Shore	0.80	2,000.00
1 December 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	0.80	1,680.00
1 December 2025	Internal strategy call (0.5); strategy call with C. West (0.3); strategy call with Alix (0.8); strategy call with C. West (0.2); and strategy call with S. Greissman (0.1).	A Zatz	1.90	3,990.00
1 December 2025	Call among W&C team re: case strategy (0.8); call with S. Greissman re: same (0.2).	A Chase	1.00	1,580.00
1 December 2025	Attend all-hands call with full W&C team (0.8); confer with A. Zatz re: same (0.1).	V Sachdev	0.90	1,278.00
1 December 2025	Call with C. Shore, J. Zakia, C. West, A. Zatz, C. Koster, and W&C associate team re: trial workstreams.	A Hong	0.80	1,096.00
1 December 2025	All-hands meeting with W&C team re: strategy.	D Litz	0.70	959.00
1 December 2025	Attend W&C team strategy call.	J Yoo	0.80	1,096.00
1 December 2025	Attend W&C all hands strategy call.	R Beil	0.70	896.00
1 December 2025	Attend all hands-call.	L Miranda	0.80	976.00
1 December 2025	Call with W&C team re: ongoing workstreams.	A Aquije	0.80	888.00
1 December 2025	Attend all-hands call with W&C team (0.8); finalize call notes and share with L. Miranda (0.4); share revised notes with team (0.1).	C Chitwan	1.30	1,443.00
1 December 2025	Attend all hands on call with W&C team re: strategy for confirmation hearing and outstanding items.	D Mago	0.70	693.00
1 December 2025	Attend call with W&C team re: strategy.	G Zahiremami	0.40	396.00
1 December 2025	Conference call with W&C team re: case strategy and trial strategy.	C Isaac	0.70	609.00
1 December 2025	Meet with C. Shore and E. Smith to discuss case strategy for confirmation hearing.	B Kakani	0.80	696.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 December 2025	Call with W&C litigation team re: work flow and witness cross-examination strategy.	A Quintana	0.80	696.00
2 December 2025	Weekly strategy call with Alix.	S Greissman	0.60	1,500.00
2 December 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	0.80	1,680.00
2 December 2025	Strategy call with Alix (0.6); strategy call with S. Greissman (0.4); and internal strategy correspondence (0.5).	A Zatz	1.50	3,150.00
2 December 2025	Call with C. Shore, A. Zatz, E. Smith, A. Chase, D. Litz, B. Lingle and Alix team re: case strategy.	V Sachdev	0.50	710.00
2 December 2025	Meeting with W&C and Alix team re: strategy.	D Litz	0.50	685.00
2 December 2025	Call with W&C litigation team re: cross-examination strategy and deposition designation progress.	A Quintana	0.60	522.00
3 December 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	2.80	5,880.00
3 December 2025	Strategy call with AlixPartners (0.5); strategy call with E. Smith (0.5); strategy call with S. Greissman (0.2); and strategy meeting with D. Litz (0.1).	A Zatz	1.30	2,730.00
3 December 2025	Review confirmation trial preparation and assistance with arguments.	D Litz	1.80	2,466.00
4 December 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	0.80	1,680.00
4 December 2025	Internal strategy meeting.	A Zatz	0.60	1,260.00
4 December 2025	Weekly advisor pre-call.	B Lingle	0.50	685.00
5 December 2025	Strategy call with C. Shore (0.3); and strategy call with V. Sachdev (0.3).	A Zatz	0.60	1,260.00
5 December 2025	Meeting with A. Chase, L. Miranda, C. Chitwan, and G. Zahiremami re: strategy.	D Litz	0.30	411.00
6 December 2025	Strategy call with B. Lingle (0.3); strategy call with S. Greissman (0.2); and internal strategy call (0.5).	A Zatz	1.00	2,100.00
6 December 2025	Call with Alix, C. Shore, J. Zakia, S. Greissman, A. Zatz, A. Chase, E. Smith, B. Lingle, D. Litz, J. Walz, J. Bourgault, J. Yoo and L. Miranda re: confirmation strategy.	V Sachdev	0.50	710.00
7 December 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	0.80	1,680.00
8 December 2025	Conferences with W&C and Alix teams re: Plan	G Pesce	0.80	1,680.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	objections, case valuation strategy and tactics.			
8 December 2025	Internal strategy meeting (0.4); and strategy call with V. Sachdev (0.2).	A Zatz	0.60	1,260.00
9 December 2025	Strategy call with C. Shore (0.2); and strategy call with B. Lingle (0.2).	A Zatz	0.40	840.00
10 December 2025	Internal strategy meeting.	A Zatz	0.60	1,260.00
23 December 2025	Conferences with W&C and Alix teams re: Plan objections, case valuation strategy and tactics.	G Pesce	0.80	1,680.00
SUBTOTAL: Case Strategy			**33.40**	**56,801.00**

Cash Management & Intercompany Issues

1 December 2025	W&C strategy call.	C West	0.80	1,432.00
SUBTOTAL: Cash Management & Intercompany Issues			**0.80**	**1,432.00**

Claims Administration & Objections

3 December 2025	Call with C. West and A.J. Erikson re: potential claims (0.4); and internal call re: potential actions (1.0).	A Zatz	1.40	2,940.00
5 December 2025	Internal call re: potential actions.	A Zatz	1.10	2,310.00
SUBTOTAL: Claims Administration & Objections			**2.50**	**5,250.00**

Committee Meetings & Communications

2 December 2025	Call with counsel to Uber.	A Zatz	0.10	210.00
3 December 2025	Draft agenda for December 4 Committee meeting.	D Mago	0.10	99.00
4 December 2025	Attending advisor pre-call (0.3); and Committee meeting (0.5).	A Zatz	0.80	1,680.00
4 December 2025	Attend meeting with Committee.	C Koster	0.50	950.00
4 December 2025	Attend weekly Committee call.	V Sachdev	0.50	710.00
4 December 2025	Committee advisor meeting re: strategy (0.3); attend Committee meeting (0.5).	D Litz	0.80	1,096.00
5 December 2025	Update call with Covington.	A Zatz	0.20	420.00
12 December 2025	Conferences with M. Dundon and other Committee members re: ruling.	G Pesce	0.80	1,680.00
12 December 2025	Update e-mail to Committee.	A Zatz	0.20	420.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 December 2025	Confer with Committee re: confirmation hearing (0.2); confer with A. Zatz re: update on hearing (0.2).	D Litz	0.40	548.00
15 December 2025	Emails with Committee.	C Koster	0.40	760.00
16 December 2025	Review Alix materials for final committee meeting (0.6); related correspondence with Alix (0.2).	S Greissman	0.80	2,000.00
18 December 2025	Final committee meeting and follow up.	S Greissman	0.80	2,000.00
18 December 2025	Update call with Committee.	A Zatz	0.50	1,050.00
18 December 2025	Call with Committee re: next steps.	E Smith	0.50	815.00
18 December 2025	Attend Committee meeting.	D Litz	0.50	685.00
SUBTOTAL: Committee Meetings & Communications			**7.90**	**15,123.00**

Corporate, Securities & Regulatory Issues

1 December 2025	Call with A. Zatz, C. West, A. Chase and G. Zahiremami re: potential arguments (0.5); follow up review of indenture (1.7).	A Ericksen	2.20	4,840.00
2 December 2025	Review indenture.	A Ericksen	0.20	440.00
3 December 2025	Call with C. West and A. Zatz re: potential arguments (0.5); review relevant indenture and DTC provisions (0.8).	A Ericksen	1.30	2,860.00
4 December 2025	Correspond with C. West re: indenture interpretation.	A Ericksen	0.20	440.00
6 December 2025	Review changes to corporate documents in Plan supplement.	A Ericksen	0.40	880.00
6 December 2025	Review of revised Plan Supplement, including Amended and Restated LLCA, Contribution Agreements, and restructuring transaction structure for potential issues.	S Abouhashish	3.90	3,393.00
7 December 2025	Correspond with C. West re: DTC mechanics.	A Ericksen	0.20	440.00
SUBTOTAL: Corporate, Securities & Regulatory Issues			**8.40**	**13,293.00**

Discovery

5 November 2025	Review documents re: UHC settlement and email with R. Beil (0.6); calls & emails with B. Kakani and J. Walz on deposition preparation (0.7); review documents and emails with A. Hong re: same (8.9).	C Chitwan	10.20	11,322.00
6 November 2025	Review documents re: K. Shepard deposition and emails with B. Kakani and A. Hong re: same (5.9); assist with upcoming deposition preparation and	C Chitwan	6.40	7,104.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	discussions re: same with B. Kakani (0.5).			
7 November 2025	Review documents and assist team with upcoming depositions (7.8); Call with A. Chase, A. Hong. E. Smith, J. Walz, A. Aquije, A. Quintana, C. Issac and J. Bourgault re: discovery (0.5).	C Chitwan	8.30	9,213.00
10 November 2025	Review documents and emails re: hot documents with A. Quintana and C. Issac (4.3); emails with A. Hong and Veritext re: upcoming depositions (0.2).	C Chitwan	4.50	4,995.00
11 November 2025	Assist team with upcoming depositions and emails re: same (0.5); finalize review of priority batches and emails re: same with A. Quintana and C. Issac (5.3).	C Chitwan	5.80	6,438.00
12 November 2025	Assist team with upcoming depositions (0.5); emails re: same with A. Hong and C. Issac (0.2); assist A. Hong with Silvers deposition (0.8); emails re: same with K. Wick and C. Isaac (0.2).	C Chitwan	1.70	1,887.00
13 November 2025	Assist team with Norwalk deposition (2.6); emails re: same with A. Quintana, E. Smith and C. Isaac (0.2).	C Chitwan	2.80	3,108.00
14 November 2025	Assist with outline for Norwalk deposition (6.7); emails and calls re: same with A. Quintana, C. Isaac, A. Hong, L. Miranda and J. Bourgault (1.1).	C Chitwan	7.80	8,658.00
1 December 2025	Locate and review blowout materials per request from C. Shore (0.2); correspond with A. Zatz re: same (0.1).	V Sachdev	0.30	426.00
2 December 2025	Update production log for received native productions (0.4); update native productions document numbering to reflect production sources (0.4).	K Chen	0.80	392.00
2 December 2025	Set up new processing workspace re: ModivCare Native Production.	P Galvan	0.50	210.00
2 December 2025	Assist with setting up requested document search (0.6); export document populations (0.4).	G Chemborisov	1.00	490.00
3 December 2025	Calls and meetings with C. Shore re: trial preparation and documents (1.5); meet and confer re: exhibit list (1.0); prepare for meet and confer (0.6); deposition designations (3.0); cross-examination outline preparation (2.0); review documents on Debtors' exhibit list (1.8).	E Smith	9.90	16,137.00
3 December 2025	Assist with exhibit stamping docs for rush filing request.	J Fajar	0.80	432.00
4 December 2025	Assist with stamping exhibits (0.6); run optical character recognition (0.4).	G Chemborisov	1.00	490.00
4 December 2025	Assist with exhibit stamping docs for rush filing request.	J Fajar	0.60	324.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
4 December 2025	Manage Digital Exhibit Labeling of Exhibits CX-1 - CX-236 (1.2); manage intake of documents designated as Exhibits (0.9); Apply Digital Exhibit Sticker and adjust page area placements (1.0); make Stamped copy available to matter team (0.2).	G Pados	3.30	1,782.00
5 December 2025	Download DX and JX exhibits for case team (0.4); extract and copy to case team folders (0.3); prepare USB drive and copy CX exhibits from network folder (0.4).	K Chen	1.10	539.00
8 December 2025	Review 9.25 financial projections and related board and committee meeting materials and agenda and company correspondence.	C Chitwan	1.40	1,554.00
11 December 2025	Research for cases re: consideration for third-party releases (0.5); reviewing Gonzales transcript to assist preparation for closing remarks (0.3).	A Quintana	0.80	696.00
15 December 2025	Follow up with invoices per C. Chitwan re: Veritext invoice.	A Venes	0.10	49.00
SUBTOTAL: Discovery			**69.10**	**76,246.00**

Exclusivity, Plan & Disclosure Statement

20 November 2025	Review confirmation objection, preliminary statement (0.4); correspond with A. Zatz re: same (0.1).	E Feld	0.50	895.00
1 December 2025	Review Jupiter issues (0.3); all hands call re: confirmation (0.5).	S Greissman	0.80	2,000.00
1 December 2025	Preparation for cross-examinations of witnesses (2.2); draft opening argument (1.8); review depositions (1.6).	J Shore	5.60	14,000.00
1 December 2025	Prepare for and attend team meeting re: trial preparation (0.7), prepare for confirmation hearing (4.7).	J Zakia	5.40	11,880.00
1 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	1.80	3,780.00
1 December 2025	Telephone internal re: hearing preparation (0.8); prepare for confirmation hearing (0.6).	C Koster	1.40	2,660.00
1 December 2025	Preparation for Silvers' cross examination and research re: same.	C West	3.30	5,907.00
1 December 2025	Meet with J. Yoo and A. Chase re: exhibit lists (0.6); review draft exhibit list (1.0); all hands meeting with C. Shore (1.0); review discovery dispute and meet and confer (2.0); review outlines for cross (2.9); discuss direct outlines with J Walz and R. Komendowski (1.5); discuss documents with C. West in preparation for hearing (0.5); preparation for trial (0.7).	E Smith	10.20	16,626.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
1 December 2025	Review Debtors' proposed exhibit list (1.3); email J. Yoo re: same (0.6).	A Chase	1.90	3,002.00
1 December 2025	Draft Z. Jamal cross-examination outline for confirmation hearing.	A Hong	0.50	685.00
1 December 2025	Telephone conference with W&C team re: confirmation preparation.	B Lingle	0.80	1,096.00
1 December 2025	Assist with confirmation hearing preparation (1.9); confer with W&C team re: confirmation hearing preparation (0.4); assist with preparing exhibit list (2.9); confer with W&C team re: exhibit list (0.3); correspond with Debtors' counsel re: exhibits (0.2); correspond with Debtors' counsel re: deposition designations (0.1).	J Yoo	5.80	7,946.00
1 December 2025	Revise deposition summary chart (0.4); email with J. Yoo re: same (0.1); draft cross-examination outline for C. Shandler (4.3); review documents re: same (1.6); emails with J. Zakia re: same (0.2); review cross-examination outline for L. Norwalk (0.2); email with J. Bourgault re: same (0.1).	L Miranda	6.90	8,418.00
1 December 2025	Review and revise hot documents tracker and emails with L. Miranda re: same (2.4); research re: expert testimonies re: liquidation analysis (6.5); and call with C. West re: same (0.4); discussions with L. Miranda on pending matters (0.3); discussions on exhibits with B. Kakani (0.1).	C Chitwan	9.70	10,767.00
1 December 2025	Attend all-hands strategy meeting (0.8); Prepare L. Norwalk cross-examination outline (2.9); Review cleansing materials / projections discovery (2.3); Call with E. Smith re: trial strategy (0.3); Prepare summary of corporate designee testimony (1.7); Prepare K. Shepard cross-examination outline (0.7).	J Bourgault	8.70	7,569.00
1 December 2025	Research for motions in limine and other evidentiary objections (0.6); review Debtors' proposed exhibit list and joint exhibit list for inadmissible or missing documents (2.5).	B Kakani	3.10	2,697.00
1 December 2025	All hands calls with full team (0.8); coordination with W&C team re: pending workflows (0.4); coordination re: travel to Houston for confirmation hearing (0.5); prepare confirmation hearing materials for C. Koster (1.4); revise deposition summaries (0.2); call with E. Smith re: expert deposition outline (0.2); begin drafting direct outline for G. Magrisi (3.9).	J Walz	7.40	6,438.00
2 December 2025	Review Jupiter/committee issues (0.3); review correspondence re: Silvers report (0.5); prepare for confirmation (2.5).	S Greissman	3.30	8,250.00
2 December 2025	Calls re: Silvers with C. West (0.5); preparation for cross-examinations of witnesses (2.2); call with Alix team re: hearing preparation (0.5); draft opening argument (1.8); settlement emails (0.5); review depositions and exhibits (1.6); preparation for Silvers	J Shore	7.70	19,250.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	conference (0.6).			
2 December 2025	Prepare for confirmation trial, review and revise cross-examination outline and potential exhibits.	J Zakia	5.70	12,540.00
2 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	1.80	3,780.00
2 December 2025	Preparing chart of confirmation objections.	A Zatz	0.30	630.00
2 December 2025	Prepare for confirmation hearing.	C Koster	2.50	4,750.00
2 December 2025	Call with A. Chase and L. Miranda re: Silvers letter (0.2); draft/review/edit response letter to Court and call with C. Shore re: same (0.6); prepare Silvers' cross and research re: same (1.2); prepare for Silvers oral argument, research (5.0); and calls with C. Shore re: same (0.5).	C West	7.50	13,425.00
2 December 2025	Prepare and review cross examination outlines (4.5); review exhibits and exhibit list (1.9); search documents for support and discuss with C. Shore (2.4); assist with evidence for standing motion replies (2.5); review deposition designations (2.8); meet with C. Shore re: trial preparation (0.6); meet and discuss trial preparation with Alix (1.6).	E Smith	16.30	26,569.00
2 December 2025	Call among litigation team re: confirmation hearing preparation (0.6); email with J. Yoo re: exhibit list for hearing (0.4); draft motion re: Silvers testimony (4.2); assist with preparation for status conference (3.8); review and revise letter response re: status conference (0.5); review research from C. Chitwan re: expert testimony at trial (0.7).	A Chase	10.20	16,116.00
2 December 2025	Review A. Zatz' draft demonstrative for confirmation re: Plan infirmities (0.2); correspondence with Alix, A. Zatz, B. Lingle, R. Beil, and D. Litz re: same (0.2).	V Sachdev	0.40	568.00
2 December 2025	Draft Z. Jamal cross-examination outline for confirmation hearing (5.7); call with E. Smith, A. Chase, J. Yoo, L. Miranda, and litigation team re: trial work streams (0.7); confer with A. Chase re: Jamal cross (0.2).	A Hong	6.60	9,042.00
2 December 2025	Correspond with W&C team re: confirmation preparation (0.3); telephone conference with W&C, Alix teams re: confirmation preparation (0.5).	B Lingle	0.80	1,096.00
2 December 2025	Assist with exhibit list (1.8); confer with W&C team re: exhibit list (0.4); review Debtors' exhibit list (2.9); confer with W&C team re: Debtors' exhibit list (0.7); correspond with Debtors re: exhibits (0.2).	J Yoo	6.00	8,220.00
2 December 2025	Call with W&C litigation re: trial preparation (0.7); review deposition transcripts for confirmation trial (1.7); emails with W&C re: demonstratives (0.3); draft letter to Court re: D. Silvers (0.8): revise letter to Court re: D.	L Miranda	8.20	10,004.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Silvers with comments from C. West (1.6); confer with A. Chase and C. West re: same (0.4); review letter from D. Silvers (0.6); call with C. West and A. Chase re: same (0.4); review legal research re: exclusion of testimony (1.4); conduct follow-up research re: same (0.3).			
2 December 2025	Call on pending litigation workstreams for confirmation trial with A. Chase. E. Smith, L. Miranda and other litigation team members (0.6); finalize research on expert testimonies and share with C. West (1.0); emails with Veritext (0.2); assist team with video depositions (0.6); review Heath deposition video and emails re: same with L. Miranda and AV team (3.0); discussions on exhibits with K. Wick (0.4); emails on pending matters with A. Chase, L. Miranda, and others (0.5).	C Chitwan	6.30	6,993.00
2 December 2025	Prepare K. Shepard cross-examination outline (10.4); Attend litigation team workstreams meeting (0.7).	J Bourgault	11.10	9,657.00
2 December 2025	Conference call with E. Smith, A. Chase and W&C team re: trial and case administration (0.7); Review B. Gutierrez deposition for targeted searches in preparation for trial (3.1).	C Isaac	3.80	3,306.00
2 December 2025	Research on motions in limine and other evidentiary objections for Tuesday status conference.	B Kakani	6.90	6,003.00
2 December 2025	Reviewing Gonzales deposition and testimony to create highlight reel of testimony relevant to upcoming trial.	A Quintana	2.30	2,001.00
2 December 2025	Begin drafting direct outline for G. Magrisi (6.8); call with litigation team re: active workstreams (0.6).	J Walz	7.40	6,438.00
2 December 2025	Update exhibit list (0.3); prepare chart of exhibits sources (1.3); correspondence with W&C team re: same (0.1); confer with B. Kakani re: same (0.2).	K Wick	1.90	931.00
3 December 2025	Prepare for confirmation (1.5); prepare for reply analysis (2.1).	S Greissman	3.60	9,000.00
3 December 2025	Calls and emails re: Silvers with W&C and Alix teams (0.5); preparation for Shepherd cross-examination (2.5); exhibits call with W&C and Alix teams (0.7); meetings with W&C team re: trial preparation (1.0); trial preparation (3.9).	J Shore	8.60	21,500.00
3 December 2025	Prepare for confirmation hearing.	J Zakia	5.30	11,660.00
3 December 2025	Revising chart of confirmation objections.	A Zatz	0.30	630.00
3 December 2025	Prepare for confirmation hearing (0.7); emails re: status conference (0.3).	C Koster	1.00	1,900.00
3 December 2025	Call with S. Greissman re: Silvers testimony hearing	C West	3.30	5,907.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); call with W&C team re: exhibit lists (0.7); preparation for Silvers' cross (2.5).			
3 December 2025	Call among W&C litigation team re: exhibits for upcoming hearing (0.7); assist with preparation for meet and confer re: exhibit lists (1.6); meet and confer among parties re: exhibits (0.8); call with J. Yoo, E. Smith, L. Miranda re: same (0.5); email among W&C re: exhibits for trial (0.7).	A Chase	4.30	6,794.00
3 December 2025	Draft Z. Jamal cross-examination outline re: valuation for confirmation hearing (4.5); confer with A. Chase re: Jamal cross-examination outline (0.3); emails with K. Wick re: Jamal cross binder (0.5); draft Z. Jamal cross-examination outline re: fact testimony for confirmation hearing (4.4).	A Hong	9.70	13,289.00
3 December 2025	Review effect of certain events on Plan confirmation.	B Lingle	0.30	411.00
3 December 2025	Attend W&C team call re: exhibits (0.5); review Debtors' exhibit list (2.8); confer with W&C team re: Debtors' exhibit list (2.2); assist with preparing exhibit list for filing (1.8); attend W&C team call re: exhibits (0.9); attend meet and confer with Debtors' counsel re: exhibits (0.8); assist with preparing exhibits for filing (2.3); confer with W&C team re: exhibit list (0.3); confer with W&C team re: exhibits (0.4).	J Yoo	12.00	16,440.00
3 December 2025	Email with A. Chase re: research on exclusion of testimony (0.2); email with A. Quintana re: same (0.2); review exhibits for confirmation hearing (3.7); confer with W&C re: same (1.3); call with A. Chase, E. Smith, and J. Yoo re: exhibit list (0.3); call with K. Wick, J, Yoo, C. Chitwan, B. Kakani and D. Hirshorn re: exhibit list (0.9); attend meet and confer with LW re: exhibits (0.8); continue to review exhibit chart for Committee exhibits list (1.8); call with C. West, C. Shore, J. Yoo, and A. Chase re: exhibits for trial (0.8); review hearing transcript re: C. Shandler (0.7); email with J. Zakia re: same (0.3); continue to review exhibits for confirmation (1.2); review letter to Court for filing re: D. Silvers' report and testimony (0.5); email with Committee re: same (0.2); review C. West's hearing points (0.3); review research re: exclusion of testimony (1.4); draft rider re: factual research for standing claims (1.1); review diligence re: same (0.3).	L Miranda	16.00	19,520.00
3 December 2025	Call on exhibits with C. Shore, E. Smith, A. Chase, J. Yoo, L. Miranda and B. Kakani (0.7); call on exhibits list with J. Yoo, L. Miranda, B. Kakani, K. Wick. A. Venes and D. Hirshorn (0.4); search for further caselaw re: expert testimonies for liquidation analyses and email A. Chase and C. West (4.2); assist J. Yoo and L. Miranda with finalizing exhibits list along with B. Kakani, D. Hirshorn, A. Venes and K. Wick (7.8).	C Chitwan	13.10	14,541.00
3 December 2025	Prepare K. Shepard cross-examination outline (2.3); Discuss cross-examination outline with C. Shore (0.2); Discuss deposition designations with E. Smith (0.1); Revise K. Shepard cross-examination outline (4.3);	J Bourgault	12.20	10,614.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Research discovery issues (5.3).			
3 December 2025	Review Debtors' exhibit list for evidentiary issues in advance of meet and confer (1.7); prepare exhibits for filing and stamping for confirmation hearing (5.4).	B Kakani	7.10	6,177.00
3 December 2025	Summarizing Gonzales deposition and testimony re: Silvers, FTI, and other concerns (1.6); Targeted search for documents for which opposing counsel did not provide Bates numbers (0.5); Researching court decisions re: violations of scheduling orders (3.5).	A Quintana	5.60	4,872.00
3 December 2025	Telephone call with A. Venes and K. Wick re: hearing exhibits (0.3); telephone call with K. Wick re: hearing exhibits (0.6); review complex case procedures re: exhibits (0.1); gather exhibits in singular location (0.4); format and print excel spreadsheets in anticipation of filing as exhibits (1.5); review joint exhibit list against Committee's exhibit list to determine remaining Committee exhibits (1.2); organize and begin numbering Committee exhibits in master chart (1.5); confer with J. Yoo, L. Miranda, C. Chitwan, B. Kakani, A. Venes and K. Wick through out evening re: delegating assignments re: compiling and organizing Committee Exhibits in preparation for stamping and filing (0.8); compile and organize Committee Confirmation (3.5).	D Hirshorn	9.90	4,851.00
3 December 2025	Review and respond to email from J. Yoo re: request for assistance with preparation and submission of confirmation hearing exhibits (0.1); tel. call with K. Wick and D. Hirshorn re: same (0.2); tel. conference with W&C team, K. Wick, and D. Hirshorn re: confirmation hearing exhibits preparation and filing protocol (0.6); tel. conference with K. Wick and D. Hirshorn re: same (0.6); commence pulling, organizing, reviewing, and preparing confirmation hearing exhibits (9.3).	A Venes	10.80	5,292.00
3 December 2025	Prepare deposition designations for E. Smith (1.4); circulate hearing transcript (0.1); confer with D. Hirshorn and A. Venes re: hearing exhibits (0.5); correspondence with J. Yoo and W&C team re: same (0.3); meeting with W&C team re: same (0.4); prepare and edit exhibit list (2.3); pull and organize exhibits for stamping (4.4); coordinate stamping of exhibits (2.8); prepare pdf versions of excels (3.2); prepare Jamal Cross binder (0.6); coordinate printing and delivery of same (0.2).	K Wick	16.20	7,938.00
4 December 2025	Draft Jamal cross-examination outline (2.4); team meetings re: trial preparation (0.5); calls re: exhibits with W&C and Alix teams (0.4); prepare for Shepard cross-examination (2.1); draft opening arguments (2.0); review cross-examination materials (1.3); attend Committee meeting (0.5); follow up with W&C team re: same (0.3).	J Shore	9.50	23,750.00
4 December 2025	Confer with C. Shore re: litigation strategy (0.5), prepare for confirmation hearing (6.2).	J Zakia	6.70	14,740.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
4 December 2025	Revising chart of confirmation objections (0.2); reviewing confirmation brief (2.5); and reviewing voting report (0.6).	A Zatz	3.30	6,930.00
4 December 2025	Prepare for confirmation hearing.	C Koster	0.80	1,520.00
4 December 2025	Prepare for Silvers' motion in limine / trial objections and research re: same (3.4); call with A. Hong and J. Bourgault re: same (0.8).	C West	4.20	7,518.00
4 December 2025	Calls and correspondence re: exhibit list (2.5); review disputed documents for exhibit list (3.5), review and revise cross and direct outlines (5.0); calls with litigation team re: trial preparation (1.3).	E Smith	12.30	20,049.00
4 December 2025	Call with C. West re: hearing preparation (0.1); call with L. Miranda re: exhibit list (0.1); confer with J. Yoo re: exhibit lists (1.3); review and revise deposition demonstrative (1.1).	A Chase	2.60	4,108.00
4 December 2025	Draft Z. Jamal cross-examination outline for confirmation hearing (2.0); coordinate with K. Wick re: Jamal cross binder (0.5); call with C. Shore re: Jamal cross-examination outline (0.3); call with C. Shore re: Z. Jamal cross (0.2); call with C. West and J. Bourgault re: D. Silvers evidentiary objections research (0.8); call with J. Bourgault re: same (0.2); revise summaries of corporate designee deposition testimony for S. Kern and Z. Jamal (0.8); revise Jamal cross-examination outline (4.5); legal research re: evidentiary objection to Silvers testimony (2.9).	A Hong	12.20	16,714.00
4 December 2025	Review exit revolver term sheet and exit financing fee letters re: details of letter of credit sublimit.	B Lingle	0.40	548.00
4 December 2025	Prepare hearing exhibits (6.6); confer with W&C team re: hearing exhibits (2.9); correspond with Debtors' counsel re: hearing exhibits (0.6); review Debtors' hearing exhibits (2.1); confer with W&C team re: sealing (0.4); attend W&C team call re: hearing exhibits (1.0).	J Yoo	13.60	18,632.00
4 December 2025	Review Committee exhibits list (1.4); call with W&C re: Committee exhibit list (0.5); emails with C. Shore and C. West re: same (0.2); review exhibits re: same (0.8); confer with J. Yoo re: same (0.3); call with A. Chase re: exhibits (0.1); review demonstratives for trial (0.9); meet with C. Shore and A. Chase re: same (0.4).	L Miranda	4.60	5,612.00
4 December 2025	Calls on exhibit list with W&C team (0.5); review Debtors' joint exhibits list and help with finalization and filing of Committee exhibits (public and sealed) (8.1); assist in revision and filing of Committee's exhibit list for confirmation trial (2.6).	C Chitwan	11.20	12,432.00
4 December 2025	Revise exhibit list for confirmation hearing and prepare exhibits for stamping, sealing, and filing.	B Kakani	8.40	7,308.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
4 December 2025	Researching court decisions re: violations of scheduling orders and limiting scope of testimony to standing motion.	A Quintana	3.50	3,045.00
4 December 2025	Assist with preparation of confirmation exhibits (3.9); review exhibits for confidentiality (1.0); email J. Yoo, L. Miranda, A. Chase, K. Wick, A. Venes, B. Kakani, C. Chitwan and E. Smith Committee's Exhibit List and internal exhibit list (0.1); reorganize master exhibit list based on C. Shore's requested changes (1.0); update filing version of exhibit list (0.5); preparation of slip sheets for sealed exhibits (2.1); confer with J. Yoo, L. Miranda, B. Kakani, C. Chitwan, A. Venes and K. Wick throughout day re: preparation and filing of exhibits (0.8) filing of Committee's confirmation exhibits (4.6); emails with E. Smith, J. Yoo, C. Chitwan, A. Venes, K. Wick, B. Kakani and A. Chase re: motion to seal and sealed exhibits (0.2).	D Hirshorn	14.20	6,958.00
4 December 2025	Continue finalizing confirmation exhibits for filing (11.4); tel. conference with W&C team, K. Wick, and D. Hirshorn re: task progress and next steps (0.2); assist with submission of certain confirmation exhibits (2.0); confirm filings with W&C team (0.1).	A Venes	13.70	6,713.00
4 December 2025	Update cross binder for A. Hong (0.5); confer with W&C team re: updates to exhibit list (1.3); update exhibit list and exhibits with new order and stamps (4.7); prepare slip sheets (3.2); review exhibits for filing (3.8).	K Wick	13.50	6,615.00
5 December 2025	Review omnibus reply by Debtors (Plan objection and standing motion) (3.8); review 1L response (1.1); internal conference call with A. Zatz and team re: reply to pleading (0.5); internal conference call with A. Zatz re: Plan vote (0.3); conference call with C. Shore re: Mounts-Gonzalez exhibit and related (0.1).	S Greissman	5.80	14,500.00
5 December 2025	Confirmation trial preparation (1.0); team meetings with W&C and Alix teams (1.0); draft cross examination outlines (1.2); draft opening (1.1); review caselaw (1.7).	J Shore	6.00	15,000.00
5 December 2025	Review Debtors' confirmation brief, supporting exhibits (3.4), revise witness outlines, review trial exhibits (4.8).	J Zakia	8.20	18,040.00
5 December 2025	Reviewing confirmation brief and other confirmation filings.	A Zatz	6.40	13,440.00
5 December 2025	Prepare for confirmation hearing (1.0); review filings (1.5); review voting stipulation (0.5).	C Koster	3.00	5,700.00
5 December 2025	Prepare for Silvers cross and research re: same.	C West	3.50	6,265.00
5 December 2025	Review debtor filings in support of confirmation and objection to standing motions (3.2) and discuss same with litigation team (1.2); review and revise cross and direct outlines for trial (4.9); review deposition counter designations and responses (2.0); review direct-	E Smith	14.60	23,798.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	examination videos (2.3); correspondence with opposing counsel re: trial logistics (1.0).			
5 December 2025	Confer with C. West, L. Miranda, C. Shore re: hearing preparation (0.9); call with J. Yoo, A. Hong, L. Miranda re: same (0.9); review voting declaration (0.2); email among W&C team re: hearing preparation (1.6); conduct research for evidentiary issues in advance of trial (2.6); review Debtors' omnibus brief in support of confirmation (4.3); confer with L. Miranda re: hearing preparation and strategy (1.4); email with Debtors' counsel re: exhibits and demonstratives (0.3); call with C. Shore re: same (0.1).	A Chase	12.30	19,434.00
5 December 2025	Revise summary chart of corporate designee testimony (0.4); emails with L. Miranda, J. Bourgault, and K. Wick re: cross-examination outlines and binders (0.3); review Debtors' omnibus standing motion objection and confirmation reply (1.9); review Kern and Jamal deposition testimony for standing motion reply brief (1.5); emails with A. Chase and J. Yoo re: Debtors' counter-designations and objections to deposition designations (0.4); review Debtors' deposition counter-designations and objections for S. Kern (0.5); emails with D. Litz re: reply arguments on litigation funding (0.5); call with A. Chase, J. Yoo, and L. Miranda re: trial workstreams (0.9); call with J. Bourgault re: Silvers evidence research (0.2); legal research re: Silvers evidentiary objections (4.6).	A Hong	11.20	15,344.00
5 December 2025	Review, analyze confirmation brief (2.5); telephone conference with C. Shore, A. Zatz and LW team re: voting report (0.3); draft stipulation re: same (1.3).	B Lingle	4.10	5,617.00
5 December 2025	Review Debtors' counter-designations and objections to designations (1.8); correspond with Debtors' re: hearing exhibits (0.4); review Debtors' corporate designee witness testimony in preparation for hearing (2.9); confer with W&C team re: hearing exhibits (1.7); confer with W&C team re: Debtors' filings (0.6); confer with W&C team re: 1L lender filings (0.6); attend W&C team call re: trial preparation (0.5).	J Yoo	8.50	11,645.00
5 December 2025	Confer with C. West, A. Chase, C. Shore re: hearing preparation (0.9); call with J. Yoo, A. Hong, L. Miranda re: same (0.9); confer with L. Miranda re: hearing preparation and strategy (1.4); review exhibits for confirmation hearing (0.4); review claims register re: voting report (0.4); review confirmation brief and objection to standing motions (2.2).	L Miranda	6.20	7,564.00
5 December 2025	Assist L. Miranda with hearing preparation and emails re: same with L. Miranda, K. Wick. C. Issac and A. Quintana.	C Chitwan	2.70	2,997.00
5 December 2025	Discuss trial preparation with Houston office team (0.2); Review K. Shepard cross-binder (0.1); Review Gonzales deposition designations (0.1); Review Gonzales deposition designations & propose changes (4.7); Prepare materials for trial (0.7); Research	J Bourgault	11.50	10,005.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	discovery deadlines (0.5); Discuss trial preparation action items (0.6); Create evidentiary one-pager for expert testimony (0.8); Research director investigations issues (3.8).			
5 December 2025	Prepare confirmation hearing documents.	C Isaac	8.60	7,482.00
5 December 2025	Review First Lien Lender exhibit list for evidentiary issues (1.6); draft objections to Debtors' counter-designations (2.9); research on Court's evidentiary rules (0.4); research on prejudicial impact of inadmissible evidence (1.2).	B Kakani	6.10	5,307.00
5 December 2025	Preparing trial binder and pulling documents re: Silvers investigation.	A Quintana	1.90	1,653.00
5 December 2025	Coordination with C. Chitwan and L. Miranda re: new document filings (0.6); identify counter designations (1.8); conduct research on evidentiary issues (2.8).	J Walz	5.20	4,524.00
5 December 2025	Telephone call with A. Venes re: continued preparation for confirmation hearing (filed exhibits) (0.3); download and split filed Committee confirmation exhibits (4.2); upload exhibits to secure file share for Debtors (0.4); confer with A. Venes throughout day re: confirmation exhibits (0.5); emails to Access Transcripts and Judicial Transcribers re: rush confirmation hearing transcripts (0.2); emails with C. Koster, J. Yoo and A. Chase re: same (0.1); update master exhibit spreadsheet with filed docket number (0.5).	D Hirshorn	6.20	3,038.00
5 December 2025	Assist team with downloading, saving, and organizing filed versions of confirmation exhibits in preparation for confirmation hearing.	A Venes	5.80	2,842.00
5 December 2025	Coordinate delivery of native exhibits to courthouse (2.3); prepare hearing materials (7.4); coordinate printing and delivery of same (1.3); prepare hearing preparation materials for S. Greissman (0.8); coordinate delivery of same (0.3); circulate hearing transcript (0.1).	K Wick	12.20	5,978.00
6 December 2025	Review omnibus Debtors reply (2.5); review 1L reply/objection (1.5); conference call with A. Zatz re: committee reply to standing motion objection (0.5); review same (1.5).	S Greissman	6.00	15,000.00
6 December 2025	Trial preparation (4.8); meetings with W&C and Alix teams (1.0); draft cross-examination outlines (1.9).	J Shore	7.70	19,250.00
6 December 2025	Prepare for confirmation hearing.	J Zakia	8.70	19,140.00
6 December 2025	Correspondence re: voting report (0.9); reviewing Second Amended Plan (0.5).	A Zatz	1.40	2,940.00
6 December 2025	Prepare for confirmation hearing.	C Koster	2.80	5,320.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 December 2025	Reviewed Plan Supplement for any red flag issues.	F Lupinacci	1.20	2,280.00
6 December 2025	Trial preparation (7.8); draft/edit reply re: standing motion (6.2).	C West	14.00	25,060.00
6 December 2025	Trial preparation (13.6); assist with standing motion replies (1.5).	E Smith	15.10	24,613.00
6 December 2025	Call among W&C & Alix re: declarations (0.5); calls with J. Yoo re: exhibits (0.3); conduct research re: evidentiary issues in advance of trial (4.3); draft argument outline re: same (1.6); review memo from J. Yoo re: late disclosures (0.4); review proposed Debtors exhibits (5.5); confer among W&C re: same (1.0); assist with preparation for trial (1.6).	A Chase	15.20	24,016.00
6 December 2025	Review Z. Jamal and C. Shandler declarations (1.0); call with C. Shore and W&C and Alix teams re: Shandler and Jamal declarations (0.5); call with J. Bourgault re: Silvers evidence research (0.9); review cases flagged by J. Bourgault re: evidentiary issue (0.8); legal research on Silvers evidentiary issue (3.2); revise summary of D. Silvers evidentiary objections for C. West (1.5); call with C. Shore re: Jamal cross (0.2); revise Z. Jamal cross-examination outline (2.1).	A Hong	10.20	13,974.00
6 December 2025	Review voting stipulation (0.1); telephone conference with A. Zatz re: review of confirmation brief and order (0.2); respond to Debtors' positions in confirmation brief (2.7); telephone conference with W&C and Alix teams re: confirmation preparation (0.5).	B Lingle	3.50	4,795.00
6 December 2025	Prepare objections to counter-designations (2.6); prepare responses to objections to designations (2.1); confer with W&C team re: designations (1.1); attend W&C team call re: declarations (0.5); attend team call re: trial preparation (0.3); prepare outline for confirmation hearing (2.6); confer with W&C team re: outline for confirmation hearing (0.4); confer with W&C team re: hearing exhibits (1.7); correspond with Debtors re: hearing exhibits (0.4); conduct research in support of argument at hearing (1.9).	J Yoo	13.60	18,632.00
6 December 2025	Meet with J. Zakia re: C. Shandler cross examination outline (0.7); revise C. Shandler cross examination outline (3.4); review exhibits for C. Shandler cross examination (1.2); draft section of standing motion reply brief (various iterations) (3.1); conduct legal research re: same (2.4); review exhibits for confirmation trial (1.8); review pleadings re: confirmation trial (1.3); call with A. Aquije re: standing motion reply (0.4); email with W&C re: cross-examination outline binders (0.6); confer with A. Chase re: confirmation trial and exhibits (0.8); call with A. Quintana, J. Yoo and I. Chantal re: confirmation trial work streams (0.3); emails with W&C re: standing motion reply (0.9); email with Alix re: C. Shandler cross-examination outline (0.2).	L Miranda	17.10	20,862.00
6 December 2025	Review DMG deposition transcript and video & clip for	C Chitwan	1.90	2,109.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	trial and assist in finalizing same and emails re: same with AV Team, L. Miranda and E. Smith (1.5); emails with K. Wick re: binders for trial (0.4).			
6 December 2025	Research director investigation issues (6.8); Discuss Norwalk cross-outline & Gonzales designations with E. Smith (1.1); Revise K. Shepard cross-examination outline (4.6); Review Norwalk exhibits (1.3); Review Gonzales deposition designations (2.2).	J Bourgault	16.00	13,920.00
6 December 2025	Review Debtors' appendix to confirmation brief for evidentiary issues (2.1); research on prejudicial impact of inadmissible evidence (3.6).	B Kakani	5.70	4,959.00
6 December 2025	Call with Alix Partners re: responses to Debtors' filings (0.7); breakout discussion with A. Chase, E. Smith, and L. Miranda re: same and other pre-trial issues (0.2); revise M. Brown direct examination outline (3.0); update opening statement (0.8); update G. Magrisi direct examination outline (0.8); identify deposition designation objections (0.8); research re: expert reports (3.2).	J Walz	9.50	8,265.00
6 December 2025	Confer with K. Wick re: renaming Debtors' exhibits for printing (0.1); rename and organize Debtors exhibits (1.1); confirm sealed CX-008 was sent correctly to Debtors (0.1); download ECF 909-10 (0.2); upload to secure file share (0.1); run optical character recognition on exhibit (0.6).	D Hirshorn	2.20	1,078.00
6 December 2025	Prepare hearing material binders (4.4); coordinate printing and delivery with vendor (1.3); confer with W&C team re: same (0.3); pull case precedent for C. Chitwan (0.4).	K Wick	6.40	3,136.00
7 December 2025	Trial preparation (9.0); meetings with W&C and Alix teams re: trial preparation (2.7).	J Shore	11.70	29,250.00
7 December 2025	Prepare for confirmation hearing.	J Zakia	5.90	12,980.00
7 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	0.80	1,680.00
7 December 2025	Review and edit replies (2.0); prepare for confirmation hearing (3.5).	C Koster	5.50	10,450.00
7 December 2025	Trial preparation (9.1); draft/edit reply re: standing motion (7.5).	C West	16.60	29,714.00
7 December 2025	Review exhibits and evidence for trial (2.0); prepare for cross examinations and direct exams and other trial preparation (12.0).	E Smith	14.00	22,820.00
7 December 2025	Prepare for meet and confer with Debtors (0.6); meet and confer re: exhibits for trial (1.5); review exhibits on Debtors' key list (1.9); confer among W&C re: exhibits (0.9); email Debtors re: same (0.5); assist with trial preparation (2.8).	A Chase	8.20	12,956.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 December 2025	Revise cross-examination outline for Z. Jamal (2.5); update Jamal cross exhibits (0.4); coordinate with K. Wick re: Jamal cross exhibits and binder (0.6); emails with C. Shore, E. Smith, A. Chase, and L. Miranda re: Jamal cross-examination outline (0.5); emails with E. Smith, A. Chase, J. Yoo, and L. Miranda re: deposition designations and exhibit lists (0.5); confer with D. Litz and litigation team re: standing motion reply brief (0.5); review draft standing motion reply brief re: standing (1.0); pull Z. Jamal deposition testimony for standing motion reply (0.5); revise standing motion reply brief (0.5); meet and confer with Debtors' counsel re: trial exhibits and logistics (0.5); call with C. Shore re: Jamal cross (0.5); call with C. Shore re: Jamal cross (0.2); revise Z. Jamal cross-examination outline (3.4).	A Hong	11.60	15,892.00
7 December 2025	Draft confirmation response chart.	B Lingle	3.30	4,521.00
7 December 2025	Attend meet and confer re: hearing exhibits (1.5); confer with W&C team re: hearing exhibits (2.8); assist with hearing exhibits (1.6); prepare objections to counter-designations (2.3); prepare responses to objections to designations (1.9); confer with W&C team re: designations (1.8); prepare for meet and confer re: hearing exhibits (0.4); review Debtors' exhibit list (0.7); review Debtors' objections to Committee's exhibit list (0.4); correspond with Debtors' re: hearing exhibits (0.3).	J Yoo	13.70	18,769.00
7 December 2025	Revise C. Shandler cross-examination outline for confirmation hearing (2.2); review exhibits re: same (1.3); confer with C. Shandler re: same (0.8); review research re: liquidation analysis (1.9); conduct legal research re: same (1.6); draft memo re: same (1.1); prepare for confirmation hearing trial (2.2); review exhibits for confirmation trial (2.6); confer with A. Chase and E. Smith re: same (0.7); call with W&C re: standing motion reply (0.9); conduct legal research re: colorability for standing motion reply (0.4); emails with W&C re: workstreams for standing motion reply (0.9); review bench memos for confirmation hearing (1.4); confer with J. Zakia re: bench memos (0.4); email with Alix re: confirmation trial (0.2).	L Miranda	18.60	22,692.00
7 December 2025	Revise K. Shepard cross-examination outline (5.2); Prepare additions to Norwalk cross-binder (2.4); Prepare, consolidated, and finalize trial materials (9.5).	J Bourgault	17.10	14,877.00
7 December 2025	Draft objections to Debtors' counter-designations (2.4); research on admissibility of prejudicial or hearsay evidence (3.5).	B Kakani	5.90	5,133.00
7 December 2025	Finalize exhibits for Norwalk cross-examination (2.5); finalize exhibits for cross (5.8).	J Walz	8.30	7,221.00
7 December 2025	Review and respond to emails with C. Chitwan re: upcoming filings this evening (0.1); review and respond to emails with J. Yoo re: various upcoming filings this evening (0.1); review and finalize amended exhibit list (0.1); prepare slip sheet for exhibit to be	D Hirshorn	1.00	490.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	filed under seal (0.1); prepare for upcoming filings of replies in support of Committee motions, deposition designations and amended exhibit list (0.6).			
7 December 2025	Prepare hearing material binders (5.2); prepare cross indexes (2.4); coordinate printing and delivery with vendor (1.4); coordinate edits to binders (0.4); confer with W&C team re: same (0.9); order hearing transcript (0.4); prepare spreadsheet of exhibits (4.4).	K Wick	15.10	7,399.00
8 December 2025	Revise outline re: inadmissible exhibits (2.1); email with Debtors re: exhibit lists (0.6); confer among W&C re: exhibit lists (0.8); confer with Debtors re: Voting Agent (0.2); review Debtors' proposed demonstratives (0.7).	A Chase	4.40	6,952.00
8 December 2025	Pull precedents for closing demonstratives (0.3); emails with R. Komendwoski, E. Smith, and J. Walz re: Z. Jamal cross (0.3); revise cross-examination outline for Z. Jamal (1.6); emails with C. Shore, L. Miranda, and C. Chitwan re: financial projections (0.5); confer with J. Yoo and J. Walz re: deposition designations for D. Mounts Gonzales (0.5); review filed standing motion reply briefs (2.0); review documents Debtors intend to use at trial (1.0); review notes from Alix re: Z. Jamal cross (0.4); emails with C. Shore, R. Komendwoski, and J. Walz re: Z. Jamal Cross (0.5); revise Z. Jamal cross-examination outline (0.3).	A Hong	7.40	10,138.00
8 December 2025	Review, revise confirmation order.	B Lingle	3.20	4,384.00
8 December 2025	Review demonstrative for confirmation trial.	D Litz	0.50	685.00
8 December 2025	Confer with W&C team re: hearing strategy (1.2); review Debtors' exhibit list (2.6); correspond with Debtors re: exhibit list (0.6); confer with W&C team re: Debtors' exhibit list (2.2); assist with confirmation hearing preparation (1.3); review Committee's exhibit list (0.6); assist with filing of Committee's amended exhibit list (0.7); amend deposition designations (0.8); confer with W&C team re: deposition designations (0.4).	J Yoo	10.40	14,248.00
8 December 2025	Review DMG designations and counterdesignations and revise deposition video with R. Dawson (AV team) (1.5); attend post hearing call with A. Hong, J. Yoo, L. Miranda, A. Chase, C. Shore, C. West and other W&C team members (0.8).	C Chitwan	2.30	2,553.00
8 December 2025	Prepare & Finalize trial materials (2.5); Attend trial (8.2); Review trial updates & prepare trial materials for second day of trial (2.5).	J Bourgault	13.20	11,484.00
8 December 2025	Emails with J. Yoo re: filing of amended exhibit list (0.1); review and file Committee's Standing Reply Brief (0.2); review and respond to emails with R. Beil, V. Sachdev, D. Litz, C. Chitwan, A. Chase and L. Miranda re: Committee's Standing Motion Reply (0.1); review and finalize same (0.2); file same (0.1); electronically	D Hirshorn	1.60	784.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	serve both replies (0.1); review and respond to emails with J. Yoo re: amended exhibit list (0.1); email Lit Support to add exhibit stamp (0.1); add exhibit stamp to additional exhibits (0.2); file amended exhibit list with additional exhibits (0.1); file sealed exhibit (0.1); update exhibits (0.2).			
8 December 2025	Review and respond to team email re: Debtors' second amended W&E list (0.1); update exhibits staging area (0.1).	A Venes	0.20	98.00
8 December 2025	Update exhibit list excel with new exhibits (0.3); update exhibit folder with new exhibits (0.1); update exhibit list with ECF numbers (0.9); coordinate printing and delivery of same and other hearing materials (0.7); register attorneys for hearing (0.2); confer with W&C team re: same (0.1); confer with L. Vargas re: coverage (0.1); correspondence with W&C team re: hearing updates (0.2); circulate calendar invite for confirmation hearing (0.2).	K Wick	2.80	1,372.00
9 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	1.80	3,780.00
9 December 2025	Correspondence re: supplemental voting report (0.3); and reviewing supplemental voting report (0.3).	A Zatz	0.60	1,260.00
9 December 2025	Confer among W&C re: unopposed exhibit lists (0.9); revise proposed Silvers deposition designations (1.1); prepare for next trial day (2.0).	A Chase	4.00	6,320.00
9 December 2025	Emails with R. Komendwoski and Alix team re: Jamal cross (0.3); call with C. Shore re: Jamal cross (0.1); emails with C. Shore and L. Miranda re: Z. Jamal cross exhibits (0.5); calls with A. Chase re: amended exhibit list (0.2); coordinate filing of amended CX exhibit list (0.5); emails with A. Chase and team re: same (0.3); confer with L. Miranda re: Z. Jamal cross (0.3).	A Hong	2.20	3,014.00
9 December 2025	Correspond with W&C team re: closing arguments.	B Lingle	0.40	548.00
9 December 2025	Assist with closing deck (0.6); confer with W&C team re: joint exhibits (1.3); confer with W&C team re: hearing exhibits (1.1); confer with W&C team re: hearing strategy (1.2); assist with hearing preparation (2.3).	J Yoo	6.50	8,905.00
9 December 2025	Review revised DMG deposition videos, designations and counterdesignations and calls & emails with E. Smith, B. Kakani, L. Miranda, J. Bourgault, A. Quintana, C. Issac and R. Dawson re: edits & new video (2.8); review exhibits lists and emails with J. Yoo, A. Quintana and C. Issac on edits (0.8); emails on pending matters with team (0.3).	C Chitwan	3.90	4,329.00
9 December 2025	Draft and revise deposition designations for Gonzales and Silvers (7.0); update exhibit list (1.7).	C Isaac	8.70	7,569.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 December 2025	Prepare deposition designations and videos for confirmation hearing.	B Kakani	7.80	6,786.00
9 December 2025	Updating exhibits list for trial (1.6); preparing designation highlights and video reel for Gonzales deposition (2.2).	A Quintana	3.80	3,306.00
9 December 2025	Review and respond to team email re: assistance with filing for continued confirmation hearing.	A Venes	0.10	49.00
9 December 2025	Register attorneys for hearing (0.2); prepare demonstrative cover sheets for J. Walz (0.4).	K Wick	0.60	294.00
10 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	2.80	5,880.00
10 December 2025	Confer among W&C re: Debtors' amended exhibit lists (1.6); review and revise Silvers deposition designations (1.9); confer with J. Yoo re: deposition designations (0.3); confer with Debtors re: same (0.4).	A Chase	4.20	6,636.00
10 December 2025	Review day 1 and 2 rough trial transcripts for closing deck (1.5); draft closing deck slides re: standing tier and releases (2.0); emails with C. West and team re: closing deck (0.5); review research from C. Chitwan re: releases (1.0); emails with C. Chitwan, L. Miranda, and J. Yoo re: Plan releases research (0.5); legal research re: releases (2.5).	A Hong	8.00	10,960.00
10 December 2025	Prepare closing arguments outline and slides re: valuation (3.9); research re: valuation and 1129 requirements (3.4); telephone conferences, correspond with C. Shore, S. Greissman, A. Zatz re: same (1.2).	B Lingle	8.50	11,645.00
10 December 2025	Review hearing exhibits (2.9); confer with W&C team re: hearing exhibits (2.0); prepare deposition designations (3.1); confer with W&C team re: deposition designations (2.3); correspond with Debtors' counsel re: deposition designations (0.4).	J Yoo	10.70	14,659.00
10 December 2025	Analyze 1L Credit Documents and DIP Financing Credit Agreement re: confirmation hearing assistance (0.5); Research recovery principles re: confirmation hearing closings (1.3).	R Beil	1.80	2,304.00
10 December 2025	Review deposition videos & revised designations, counters and emails re: same with AV team, B. Kakani, L. Miranda, J. Yoo. A. Quintana, and C. Issac (6.5); assist A. Hong with research issues re: closing demonstrative (4.0).	C Chitwan	10.50	11,655.00
10 December 2025	Analyze documents in data room re: Mercury JV for support of closing arguments.	D Mago	0.40	396.00
10 December 2025	Drafting designation highlights and video reel for Gonzales and Sampson (7.0); reviewing Gonzales final deposition designations (0.8).	C Isaac	7.80	6,786.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 December 2025	Prepare deposition designation video for confirmation hearing (5.4); review final designations and counter-designations for submission to Court (2.5); assist with slides for closing argument (4.0).	B Kakani	11.90	10,353.00
10 December 2025	Preparing designation highlights and video reel for Gonzales deposition (4.8); preparing Kern transcript (3.0); reviewing Gonzales and Sampson final deposition designations (1.4).	A Quintana	9.20	8,004.00
10 December 2025	Review and respond to emails with L. Miranda re: filing demonstratives (0.1); prepare notice of filing demonstratives for attorney review (0.3); confer with C. Chitwan re: hearing transcript (0.1); emails with Judicial Transcribers re: hearing transcript (0.1); confer with L. Miranda re: official transcript (0.1); email L. Miranda and C. Chitwan copy of first day hearing transcript (0.1).	D Hirshorn	0.80	392.00
10 December 2025	Review and respond to team emails re: assistance with submission of deposition designations re: confirmation hearing (0.3); revise, finalize, and e-file Gonzales, Sampson, Gutierrez, and Kern deposition designations (0.7); conduct email service of same (0.2); email to Chambers re: same (0.1); update pleadings file (0.1); email sealed version of filing of deposition transcripts to Debtors (0.1); prepare for, and assist with e-filing of Silvers deposition designations and notice of filing confirmation hearing demonstratives (0.5); confirm filings with W&C team (0.1); conduct email service of filings including Chambers (0.1); further update pleadings files (0.1).	A Venes	2.30	1,127.00
10 December 2025	Prepare highlighted designation exhibits for J. Yoo (4.4); confer with W&C team re: same (0.4); research Plan objections for C. Chitwan (1.4); register attorneys for hearing (0.2); correspondence with W&C team re: same (0.1); circulate hearing calendar invite (0.2).	K Wick	6.70	3,283.00
11 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	1.80	3,780.00
11 December 2025	Emails with C. West, A. Chase, and C. Chitwan re: research for closing arguments (0.5); draft slides re: valuation for closing deck (1.5); revise closing deck slides (3.5); confer with A. Chase, J. Yoo, L. Miranda, and J. Walz re: closing deck (0.5).	A Hong	6.00	8,220.00
11 December 2025	Revise closing outline re: valuation and telephone conference with S. Greissman re: same.	B Lingle	1.60	2,192.00
11 December 2025	Update closing argument slides per C. Shore's comments.	B Kakani	2.20	1,914.00
11 December 2025	Register attorneys for hearing (0.2); correspondence with W&C team re: same (0.1); circulate calendar invite (0.1); pull and send exhibits to C. Chitwan (0.2); pull precedent for C. Chitwan (0.2).	K Wick	0.80	392.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 December 2025	Conferences with W&C team re: Plan confirmation matters.	G Pesce	0.80	1,680.00
12 December 2025	Reviewing proposed confirmation order (0.6); and related correspondence (0.2).	A Zatz	0.80	1,680.00
12 December 2025	Register attorneys for hearing (0.1); correspondence with W&C team re: same (0.1); correspondence with W&C team re: case updates (0.1).	K Wick	0.30	147.00
13 December 2025	Review correspondence re: confirmation order (0.4); Internal correspondence re: same (0.6).	S Greissman	1.00	2,500.00
13 December 2025	Review confirmation order.	C Koster	0.60	1,140.00
14 December 2025	Review confirmation order.	S Greissman	0.30	750.00
14 December 2025	Review questions on APA.	F Lupinacci	0.90	1,710.00
23 December 2025	Review updated agreements in Fifth Plan Supplement.	A Ericksen	0.30	660.00
23 December 2025	Correspondence re: exit facility (0.1) and reviewing updated Plan supplement (0.2).	A Zatz	0.30	630.00
26 December 2025	Reviewing Plan supplement.	A Zatz	0.20	420.00
28 December 2025	Correspondence re: Plan supplement.	A Zatz	0.20	420.00
SUBTOTAL: Exclusivity, Plan & Disclosure Statement			**1,120.40**	**1,468,002.00**

Hearings & Court Matters

3 December 2025	Prepare for and monitor status conference.	S Greissman	0.80	2,000.00
3 December 2025	Attending status conference re: Silvers declaration.	A Zatz	0.50	1,050.00
3 December 2025	Prepare for hearing and internal calls/emails re: same; (1.8); hearing re: Silvers' testimony (0.6).	C West	2.40	4,296.00
3 December 2025	Support partners at status conference (0.5); discuss same with C. West (0.7).	E Smith	1.20	1,956.00
3 December 2025	Assist with preparation for status conference.	A Chase	1.40	2,212.00
3 December 2025	Summarize arguments and share with L. Miranda (0.8); share with Alix and W&C teams incorporating comments from L. Miranda.	C Chitwan	0.80	888.00
8 December 2025	Pre-trial preparation (2.0); Attend (partial) Confirmation hearing (7.5); post hearing follow up (1.5).	S Greissman	11.00	27,500.00
8 December 2025	Attend confirmation trial (8.2); team meetings with W&C and Alix teams (1.0); trial preparation (4.3).	J Shore	13.50	33,750.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
8 December 2025	Attend confirmation hearing (8.3), review and revise cross-examination outline (2.1), meet with expert re: witness preparation and review direct outline (2.1).	J Zakia	12.50	27,500.00
8 December 2025	Preparing for confirmation hearing (1.5); participating (partial) in confirmation hearing (7.8).	A Zatz	9.30	19,530.00
8 December 2025	Prepare for (1.0) and attend (partial) confirmation hearing (8.0); follow-up with W&C team re: same (0.5).	C Koster	9.50	18,050.00
8 December 2025	Trial preparation (0.9); Day 1 of confirmation hearing (8.3); follow-up meetings and preparations for trial day 2 (4.1).	C West	13.30	23,807.00
8 December 2025	Trial preparation (7.2); attend confirmation trial (8.3).	E Smith	15.50	25,265.00
8 December 2025	Prepare for confirmation hearing (3.0); attend confirmation hearing (8.3); attend debrief with W&C re: confirmation trial (1.3); call with J. Yoo, A. Hong, C. Chitwan, and L. Miranda re: closing deck (0.6).	A Chase	13.20	20,856.00
8 December 2025	Call with C. Shore, C. West, A. Chase, J. Yoo, and L. Miranda re: trial day 1 debrief and closing deck (1.0); emails with C. West, A. Chase, J. Yoo, and L. Miranda re: closing deck (0.3).	A Hong	1.30	1,781.00
8 December 2025	Prepare for confirmation (1.2); prepare for confirmation trial (1.8); attend debrief with W&C re: confirmation trial (1.3); call with J. Yoo, A. Hong, C. Chitwan, and A. Chase re: closing deck (0.6).	L Miranda	3.10	3,782.00
8 December 2025	Preparation for trial (1.9); trial debrief and related post-trial workstreams (2.6).	J Walz	4.50	3,915.00
9 December 2025	Pre-hearing preparation (0.8); Attend (partial) confirmation hearing (5.5); Post-hearing follow up and closing strategy (1.5).	S Greissman	7.80	19,500.00
9 December 2025	Attend confirmation trial (8.0); team meetings with W&C and Alix teams (0.8); trial preparation (4.2).	J Shore	13.00	32,500.00
9 December 2025	Attend (partial) confirmation hearing (4.0); participate in expert witness preparation (7.9); review and revise direct examination outlines (1.4).	J Zakia	13.30	29,260.00
9 December 2025	Preparing for confirmation hearing (0.2); and participating (partial) in confirmation hearing (7.6).	A Zatz	7.80	16,380.00
9 December 2025	Attend (partial) Confirmation hearing (6.0); follow-up with W&C team re: same (0.6).	C Koster	6.60	12,540.00
9 December 2025	Attend and participate in second day of confirmation hearing (8.0); follow up meeting re: same (0.9); and prepare for day 3 and closing (3.5).	C West	12.40	22,196.00
9 December 2025	Participate (partial) in confirmation trial (5.0); meet with	E Smith	16.30	26,569.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Alix team (5.0); prepare direct outline (3.6); review designation video (2.0); review demonstratives (0.7).			
9 December 2025	Prepare for confirmation hearing (1.8); attend confirmation hearing (8.0); post trial meeting with W&C and Alix re: Plan confirmation hearing (0.7); review draft closing deck (1.2).	A Chase	11.70	18,486.00
9 December 2025	Draft closing deck slides re: standing and Plan releases (5.0); emails with C. Chitwan re: legal research for closing arguments (0.5).	A Hong	5.50	7,535.00
9 December 2025	Revise C. Shandler cross-examination outline with comments from J. Zakia (0.7); confer with J. Zakia re: same (0.2); prepare for confirmation hearing (1.5); debrief with W&C and Alix re: Plan confirmation hearing (0.7); review deposition designations for D. Silvers (0.6); email with Quinn re: same (0.2); review demonstratives for trial (0.3); email with LW re: same (0.1); call with LW and Paul Hastings re: same (0.1); review revised demonstrative for confirmation hearing (0.2); email with J. Zakia re: same (0.1).	L Miranda	4.70	5,734.00
9 December 2025	Prepare for confirmation hearing (1.3); Research caselaw on expert reports in anticipation of closing arguments (5.0).	J Bourgault	6.30	5,481.00
9 December 2025	Prepare exhibits for confirmation hearing (2.6); prepare witness G. Magrisi for subsequent day of hearing (6.0); review video evidence for presentation in court (1.0); revise direct examination outline for witness G. Magrisi (4.3); revise demonstrative for witness G. Magrisi's direct examination (3.4); attend post-trial workplanning meeting with trial team (0.7).	J Walz	18.00	15,660.00
10 December 2025	Prepare for (0.5) and attend confirmation hearing (6.2); post hearing follow up and preparation of closing (0.4).	S Greissman	7.10	17,750.00
10 December 2025	Attend confirmation trial (6.2); team meetings with W&C and Alix teams (1.5); trial preparation (5.8).	J Shore	13.50	33,750.00
10 December 2025	Prepare for confirmation hearing (2.5); attend confirmation hearing (6.2), prepare for closing (1.5); confer with W&C team re: same (0.4).	J Zakia	10.60	23,320.00
10 December 2025	Participation in confirmation hearing.	A Zatz	6.20	13,020.00
10 December 2025	Attend confirmation hearing (6.2); prepare for closing (1.8).	C Koster	8.00	15,200.00
10 December 2025	Attend trial day 3 (partial, remote) (5.5); prepare for closing argument and prepare slides re: same (10.3).	C West	15.80	28,282.00
10 December 2025	Prepare for confirmation (1.8); participate in confirmation trial (6.2); prepare for closing arguments (6.8); review deposition designation amendments and dispute (1.3).	E Smith	16.10	26,243.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 December 2025	Attend (partial) confirmation hearing (5.6); meet among W&C re: closing preparations (0.7); assist with closing preparation (5.7).	A Chase	12.00	18,960.00
10 December 2025	Call with C. West, A. Chase, L. Miranda, and team re: closing deck slides for standing and releases (0.6); revise closing deck slides re: standing and releases (2.0).	A Hong	2.60	3,562.00
10 December 2025	Attend team meeting re: closing deck.	J Yoo	0.50	685.00
10 December 2025	Prepare for confirmation hearing (2.1); attend debrief meeting with W&C re: confirmation hearing and closing deck (0.8); call with W&C re: closing deck for confirmation hearing (0.6); call with A. Chase and LW re: deposition designations (0.2); review deposition designations for D. Silvers for filing (0.4); review demonstratives for filing (0.6); email with A. Venes re: same (0.2); call with C. Shore, E. Smith and J. Walz re: closing deck (0.2); draft slides for closing deck (various iterations) (3.3); review transcripts and diligence re: same (1.1); confer with A. Chase and C. West re: closing deck (0.4).	L Miranda	9.90	12,078.00
10 December 2025	Call on closing deck with A. Chase, C. West, L. Miranda, A. Hong, J. Yoo and B. Kakani (0.7); post hearing debrief call with L. Miranda, A. Hong, and J. Yoo (1.0).	C Chitwan	1.70	1,887.00
10 December 2025	Prepare for day three of confirmation hearing (1.0); Assist with closing deck presentation (4.3); Research confirmation issues (2.6).	J Bourgault	7.90	6,873.00
10 December 2025	Trial preparation (4.1); post-trial debrief (1.1); trial preparation workstreams for next day (7.5).	J Walz	12.70	11,049.00
11 December 2025	Prepare for confirmation hearing (3.1); attend Confirmation hearing (4.3).	S Greissman	7.40	18,500.00
11 December 2025	Preparation for closing arguments (6.2); attend closing arguments (4.3); follow up with W&C team re: same (0.5).	J Shore	11.00	27,500.00
11 December 2025	Prepare for (2.2) and attend confirmation hearing (4.2).	J Zakia	6.40	14,080.00
11 December 2025	Preparing for confirmation hearing (3.5); and participating in confirmation hearing (4.3).	A Zatz	7.80	16,380.00
11 December 2025	Attend confirmation hearing (4.2); prepare for same (0.8).	C Koster	5.00	9,500.00
11 December 2025	Prepare for closing argument and prepare slides re: same (5.2); attend confirmation trial day 4 (closing argument) (4.2); follow-up internal meetings (0.8).	C West	10.20	18,258.00
11 December 2025	Discuss closing deck with C. Shore (1.3); prepare closing deck (8.4); participate in confirmation trial (4.2).	E Smith	13.90	22,657.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 December 2025	Assist with closing preparation (6.2); attend closing argument (4.2).	A Chase	10.40	16,432.00
11 December 2025	Assist with closing deck (3.3); confer with W&C team re: closing deck (1.1).	J Yoo	4.40	6,028.00
11 December 2025	Revise closing deck for confirmation hearing (3.1); prepare for confirmation hearing (2.7).	L Miranda	5.80	7,076.00
11 December 2025	Assist team with finalization of closing demonstrative and closing arguments.	C Chitwan	4.60	5,106.00
11 December 2025	Revise closing deck & prepare for closing arguments.	J Bourgault	5.40	4,698.00
11 December 2025	Trial preparation (6.9); post-trial debrief (0.2).	J Walz	7.10	6,177.00
12 December 2025	Monitor court bench ruling (0.5); internal and Committee follow up re: same (1.0).	S Greissman	1.50	3,750.00
12 December 2025	Attend bench ruling (0.5); follow-up calls and emails with W&C and Alix teams (1.0).	J Shore	1.50	3,750.00
12 December 2025	Attend oral ruling, follow up discussion with C. Shore re: same.	J Zakia	0.40	880.00
12 December 2025	Attending virtual bench ruling on confirmation.	A Zatz	0.50	1,050.00
12 December 2025	Confirmation hearing (0.5); follow-up internal and committee (0.6); review order (0.4).	C Koster	1.50	2,850.00
12 December 2025	Attend bench ruling (remote).	C West	0.40	716.00
12 December 2025	Listen to bench decision (0.4); calls and correspondence re: same (0.9).	E Smith	1.30	2,119.00
12 December 2025	Attend hearing re: Plan confirmation.	A Chase	0.50	790.00
12 December 2025	Confer with G. Zahiremami, R. Beil, and D. Mago re: same (0.1); review correspondence from A. Zatz re: same (0.1).	V Sachdev	0.20	284.00
12 December 2025	Emails with K. Wick & transcribers re: pre and post hearing matters.	C Chitwan	0.50	555.00
23 December 2025	Internal correspondence re: status conference (0.5); conference call with T. Davidson re: same (0.3); conference call with G. Klidonas re: same (0.3); follow up re: foregoing with internal team and Alix Partners (0.5).	S Greissman	1.60	4,000.00
23 December 2025	Attend status conference (0.3); follow-up with W&C team re: same (0.2).	C Koster	0.50	950.00
23 December 2025	Correspond with B. Lingle, A. Zatz, and D. Litz re: status conference (0.1); review correspondence from	V Sachdev	0.30	426.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	A. Zatz re: same (0.1); review summary from D. Litz re: same (0.1).			
23 December 2025	Attend hearing and summarize same for W&C team.	D Litz	0.30	411.00
SUBTOTAL: Hearings & Court Matters			**472.20**	**837,561.00**

Investigation of Causes of Action

10 November 2025	Review standing motion and complaint re: Committee representation (2.9); correspond with A. Zatz. V. Sachdev re: same (0.5).	E Feld	3.40	6,086.00
12 November 2025	Research on collapsing transactions for potential litigation claims (6.1); emails re: same with A. Zatz, D. Litz and A. Hong (0.3).	C Chitwan	6.40	7,104.00
1 December 2025	Internal conference call with standing team re: status of analysis (0.5); review standing analysis (1.8).	S Greissman	2.30	5,750.00
1 December 2025	Call with A. Chase re: investigation (0.9); call with Alix re: standing reply (0.8); call with AJ Ericksen re: standing reply (0.5); research transaction documents and case law re: standing reply (2.6).	C West	4.80	8,592.00
1 December 2025	Calls with C. West re: investigation (0.9); call among W&C and Alix Partners re: standing reply (0.8); call with C. West, A. Erickson, G. Zahiremami re: standing reply (0.5); conduct targeted searches for documents re: standing motion reply (2.9).	A Chase	5.10	8,058.00
1 December 2025	Correspond with R. Beil, G. Zahiremami, and D. Mago re: standing reply (0.1); draft outline for same (0.2); call with R. Beil, G. Zahiremami, and D. Mago re: same (0.6); confer with A. Zatz re: same (0.1); review research and send same to A. Zatz (0.3); correspond with R. Beil re: same (0.1).	V Sachdev	1.40	1,988.00
1 December 2025	Call with W&C and Alix teams re: strategy for reply brief (0.8); legal research re: potential state law claims to support analysis for proposed litigation (4.7).	D Litz	5.50	7,535.00
1 December 2025	Attend standing reply strategy call re: reply preparation (0.6), analyze and summarize case re: same (0.5).	R Beil	1.10	1,408.00
1 December 2025	Call with W&C and Alix re: standing motions (0.8); review diligence including Z. Jamal and C. Shandler deposition transcripts re: preparing standing motion reply (4.2); confer with A. Chase re: same (0.2); email with C. West and A. Chase re: standing motion reply (0.2).	L Miranda	5.40	6,588.00
1 December 2025	Meeting with V. Sachdev, R. Beil, G. Zahiremami re: standing reply (0.7); begin drafting outline re: reply rider (0.4).	D Mago	1.10	1,089.00
1 December 2025	Call with V. Sachdev and team re: reply (0.5); conduct	G Zahiremami	6.20	6,138.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	research re: same (2.3); attend call with C. West and A. Ericksen re: standing (0.5); attend call with C. West re: same (0.3); conduct research re: standing (2.6).			
2 December 2025	Reviewing potential litigation issue cases.	A Zatz	1.00	2,100.00
2 December 2025	W&C team call re: standing motion reply (0.9); transaction document and legal research re: standing motion reply and draft outline re: same (3.0).	C West	3.90	6,981.00
2 December 2025	Call with L. Miranda and C. West re: Silvers letter (0.2); call with C. West, L. Miranda, D. Litz, G. Zahiremami re: standing motion reply (0.9).	A Chase	1.10	1,738.00
2 December 2025	Correspond with R. Beil, G. Zahiremami, and D. Mago re: status (0.1); confer with A. Zatz re: same (0.1); correspond with A. Zatz and J. Amico re: claims analysis re: standing (0.3); correspond with D. Mago re: reply brief shell (0.1); draft reply brief (0.4).	V Sachdev	1.00	1,420.00
2 December 2025	Meeting with W&C team re: standing reply (1.0); confer with G. Zahiremami re: same (0.2); draft reply brief to standing motion (2.0).	D Litz	3.20	4,384.00
2 December 2025	Call with A. Chase and C. West re: Silvers Letter (0.2); call with C. West, A. Chase, D. Litz and Z. Zahiremami re: standing motion reply (0.9); draft rider re: factual research for standing reply (3.2); review diligence re: same (1.7).	L Miranda	6.00	7,320.00
2 December 2025	Legal research re: legal burden under potential litigation issue (0.4); analyze deposition transcript re: H. Sampson (0.6); analyze case law re: potential litigation issue (0.7); draft rider to reply (1.4).	D Mago	3.10	3,069.00
2 December 2025	Conduct research re: standing (5.3); share findings with C. West (0.1); attend call with W&C team re: same (0.8).	G Zahiremami	6.20	6,138.00
3 December 2025	Call with AJ Erickson re: standing motion reply research (0.5); call with A. Zatz and others re: standing motion reply (0.9); further research and drafting re: same (1.6).	C West	3.00	5,370.00
3 December 2025	Call among W&C team re: standing motion reply (1.0); review deposition testimony re: same (4.3); revise draft insert re: potential litigation issue claims from L. Miranda (1.9).	A Chase	7.20	11,376.00
3 December 2025	Correspond with R. Beil, D. Mago and G. Zahiremami re: standing reply (0.3); confer with A. Zatz re: same (0.1); draft reply brief and edit passages received from team (6.4); research re: same (3.9).	V Sachdev	10.70	15,194.00
3 December 2025	Call with W&C team re: reply brief strategy (1.1); review precedent reply briefs with review drafting standing reply (3.2); legal research to support reply arguments (1.8).	D Litz	6.10	8,357.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 December 2025	Research potential litigation issue case law re: standing reply (1.0), draft and revise argument riders re: same (2.0).	R Beil	3.00	3,840.00
3 December 2025	Call on standing reply with A. Zatz, D, Litz, L. Miranda, A. Chase and G. Zahiremami.	C Chitwan	1.00	1,110.00
3 December 2025	Conduct research re: standing reply (1.5); attend call with W&C team re: same (0.7); conduct research re: lien reply (4.3); draft section of reply re: same (1.3); confer with V. Sachdev re: same (0.1).	G Zahiremami	7.90	7,821.00
4 December 2025	Research re: potential litigation issues (1.7); and call with V. Sachdev re: potential litigation issues (0.2).	A Zatz	1.90	3,990.00
4 December 2025	Internal call to discuss exhibit lists (0.2); prepare for Silvers cross' (6.5); draft standing reply, research and internal communications re: same (3.3).	C West	10.00	17,900.00
4 December 2025	Continue reviewing evidence in support of standing claims (3.7); review research from G. Zahiremami re: potential litigation issue (2.1); confer with C. West re: same (0.4); confer with L. Miranda re: standing reply (0.6).	A Chase	6.80	10,744.00
4 December 2025	Review R. Beil's edits to reply brief (0.2); correspond with R. Beil re: same (0.1); call with A. Zatz re: reply brief arguments (0.2); call with G. Zahiremami re: same (0.2); review research from G. Zahiremami for reply (0.6); do independent research re: same (0.8).	V Sachdev	2.10	2,982.00
4 December 2025	Draft and revise shell reply brief for standing motion (3.7); review precedent reply briefs (2.4); confer with W&C team re: same (0.7).	D Litz	6.80	9,316.00
4 December 2025	Draft and revise argument rider re: standing reply.	R Beil	1.00	1,280.00
4 December 2025	Confer with C. West re: potential litigation issue (0.4); confer with L. Miranda re: standing reply (0.6).	L Miranda	1.00	1,220.00
4 December 2025	Analyze comments to reply from V. Sachdev (0.2); revise same (0.9).	D Mago	1.10	1,089.00
4 December 2025	Conduct supplemental research re: lien reply (1.3); call with V. Sachdev re: same (0.2).	G Zahiremami	1.50	1,485.00
5 December 2025	Review/analyze Debtors' and 1Ls' briefs (2.8); draft reply and research re: same (3.3); W&C team call re: same (0.5).	C West	6.60	11,814.00
5 December 2025	Review and revise reply brief outline (1.5); call with L. Miranda, D. Litz, C. Chitwan, G. Zahiremami re: standing motion reply (0.3).	A Chase	1.80	2,844.00
5 December 2025	Review and analyze responses to standing (3.5); revise reply arguments to address same (1.3); confer with A. Zatz re: same (0.1); call with R. Beil, G.	V Sachdev	6.60	9,372.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Zahiremami, and D. Mago re: reply arguments (0.6); call with A. Zatz re: same (1.1).			
5 December 2025	Review Debtors and Consenting Creditor response to standing motions (2.1); review and summarize cases from Debtors' objection brief (7.3); meeting with W&C team re: reply strategy (0.8); draft and revise reply brief (3.9).	D Litz	14.10	19,317.00
5 December 2025	Analyze Lenders and Debtors replies to standing motion re: standing motion reply (1.5); Attend W&C call re: standing motion reply strategy (0.6).	R Beil	2.10	2,688.00
5 December 2025	Call with A. Chase, D. Litz, C. Chitwan, G. Zahiremami re: standing motion reply (0.3); draft rider re: standing motion reply (2.3); conduct legal research (1.1).	L Miranda	3.70	4,514.00
5 December 2025	Research re: reasonable equivalent value (6.0); emails with D. Litz re: same (0.5); emails on pending matters with L. Miranda, R. Beil, J. Yoo. and B. Kakani (0.6); call on standing reply with D. Litz, L. Miranda, A. Chas and G. Zahiremami (0.3); call on standing reply with C. West, A. Zatz, D. Litz, G. Zahiremami and S. Greissman (0.8).	C Chitwan	8.20	9,102.00
5 December 2025	Analyze Debtors' omnibus objection and reply brief (0.4); analyze consenting creditors brief in support (0.2); analyze cases cited by both (1.2); draft riders distinguishing cases (0.9); Meeting with V. Sachdev, R. Beil, and G. Zahiremami re: strategy for reply brief (0.6).	D Mago	3.30	3,267.00
5 December 2025	Conduct research re: standing (2.2); attend call with W&C team re: same (0.7); conduct docket research re: same (1.2); email to A. Chase re: same (0.1); email to D. Litz re: citations (0.1); call with A. Chase re: same (0.2); call with standing motion team (0.5); draft section of reply and conduct related research re: same (2.4).	G Zahiremami	7.40	7,326.00
6 December 2025	Revising potential litigation issues reply.	A Zatz	5.50	11,550.00
6 December 2025	Draft section of reply brief (2.6); confer among W&C re: same (0.5).	A Chase	3.10	4,898.00
6 December 2025	Confer with R. Beil, G. Zahiremami, and D. Mago re: reply (0.2); correspond with same re: same (0.1); call with R. Beil re: same (0.1); draft sections of lien reply (3.4); research for same (2.7); review A. Zatz comments to same (0.2); revise same per comments received and make further edits of my own (3.4).	V Sachdev	10.10	14,342.00
6 December 2025	Multiple rounds of drafting and revisions to standing reply brief, iterative conferences with W&C team re: same.	D Litz	10.20	13,974.00
6 December 2025	Research potential litigation issue cases re: standing motion (1.2), research potential litigation issue cases re: same (0.8); Draft and revise potential litigation	R Beil	4.00	5,120.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	issues argument rider re: standing reply (1.0), draft and revise potential litigation issues rider re: same (1.0).			
6 December 2025	Call with L. Miranda and A. Chase re: standing motion reply (0.3); draft potential litigation claim section re: same (3.7).	A Aquije	4.00	4,440.00
6 December 2025	Research re: interpretation of value (1.2); review cases cited in opposing briefs on standing (3.0); emails with D. Litz re: revisions to standing reply (0.3).	C Chitwan	4.50	4,995.00
6 December 2025	Analyze Debtors' omnibus objection and reply brief (0.2); analyze consenting creditors brief in support (0.2); revise riders distinguishing cases (0.1).	D Mago	0.50	495.00
6 December 2025	Review and revise standing motion (2.3); prepare draft riders and conduct related research (1.4); confer with W&C team re: same (0.1); conduct research re: standing (1.4); draft section of reply re: same (2.6); email to C. West re: same (0.1).	G Zahiremami	7.90	7,821.00
6 December 2025	Research re: standing motion reply.	C Isaac	3.00	2,610.00
6 December 2025	Research re: Debtors' cited cases re: Committee's allegations re: potential litigation issue.	A Quintana	3.60	3,132.00
7 December 2025	Review Debtors omnibus response (1.5); review 1L response/objection (1.0); review standing reply (1.5); review standing reply (1.2); conference call with A. Zatz re: replies (0.5); team conference call re: standing reply and analysis (0.5).	S Greissman	6.20	15,500.00
7 December 2025	Revising standing reply (6.8); revising potential action standing motion reply (4.0); call with C. Shore re: replies (0.3); internal call re: replies (0.4).	A Zatz	11.50	24,150.00
7 December 2025	Call among W&C re: reply brief (0.8); review and revise reply brief (6.2); assist with finalizing same (0.7).	A Chase	7.70	12,166.00
7 December 2025	Revise standing reply (0.2); correspond with R. Beil, D. Mago, G. Zahiremami, and A. Zatz re: same (0.1); correspond with Alix re: same (0.2); confer with A. Zatz and Alix re: discussion on standing reply (0.1); review and implement changes to standing reply per comments received (0.4); call with Alix re: reply (0.7); call with R. Beil, D. Mago, G. Zahiremami re: reply next steps (0.3); multiple calls with A. Zatz re: arguments for reply (0.5); further revisions and comment on reply brief (3.9); correspond with Alix re: arguments for reply (0.2); call with R. Beil re: revisions to brief (0.1); correspond with A. Zatz and S. Greissman re: potential additional arguments for reply (0.4); correspond with A. Chase, R. Beil and D. Litz re: filing (0.2); correspond with R. Beil, D. Hirshorn, D. Litz, A. Chase, L. Miranda, and C. Chitwan re: filing (0.2); review standing reply brief (0.9).	V Sachdev	8.40	11,928.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
7 December 2025	Multiple rounds of drafting, revising, commenting, and editing reply brief and conferring with W&C team re: same (12.8); meeting with W&C team re: same (0.5); prepare and file brief (1.5).	D Litz	14.80	20,276.00
7 December 2025	Analyze standing reply in preparation re: standing reply call (0.5), attend call re: same (0.3); Analyze W&C edits and continuously draft and revise reply re: standing reply (6.4); conduct quality and citation checks re: same (2.1).	R Beil	9.30	11,904.00
7 December 2025	Substantive cite check re: standing reply.	A Aquije	1.00	1,110.00
7 December 2025	Call on standing reply with D. Litz, L. Miranda, A. Chase, A. Zatz, S. Greissman, C. West and G. Zahiremami (0.7); finish review cases cited by Debtors in their objection and assist D. Litz, A. Chase and L. Miranda with revision, finalization and filing of standing reply (13.8).	C Chitwan	14.50	16,095.00
7 December 2025	Revise reply to objection to standing motion (1.2); call with V. Sachdev, R. Beil, and G. Zahiremami re: strategy for reply brief (0.4); further revise reply (1.6).	D Mago	3.20	3,168.00
7 December 2025	Review and revise standing reply (5.3); call with W&C team re: same (0.3); confer with W&C team re: same (0.2); review and revise standing reply and conduct related research (4.3); confer with W&C team re: same (0.2).	G Zahiremami	10.30	10,197.00
7 December 2025	Research re: standing motion reply (8.0); revise standing motion reply (4.8).	C Isaac	12.80	11,136.00
7 December 2025	Preparing L. Norwalk deposition transcript (2.4); drafting proposed edits to Standing Reply Brief (1.5); cite checking Reply Brief and review cited case law to review for accuracy and relevance (6.8).	A Quintana	10.70	9,309.00
8 December 2025	Call with A. Zatz re: standing closing arguments for trial (0.4); research re: same (0.3); confer with R. Beil re: same (0.1).	V Sachdev	0.80	1,136.00
8 December 2025	Finalize and review filing of standing reply.	R Beil	0.80	1,024.00
8 December 2025	Emails with D. Hirshorn re: Committee replies to be filed.	C Chitwan	0.20	222.00
9 December 2025	Research re: potential litigation issues arguments.	A Zatz	0.70	1,470.00
9 December 2025	Correspond with A. Zatz and R. Beil re: standing research (0.2); research re: same (0.3).	V Sachdev	0.50	710.00
9 December 2025	Analyze and summarize relevant potential litigation issue cases re: confirmation trial and standing.	R Beil	2.00	2,560.00
10 December 2025	Preparing potential litigation issues arguments.	A Zatz	5.60	11,760.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 December 2025	Review query re: excluded collateral, and related review of loan documents and other transaction materials.	G Silnicki	0.60	882.00
10 December 2025	Prepare closing argument slides (0.4); confer with A. Zatz re: same (0.2); research for same including review of data room productions for same and review of hearing transcripts (3.4); draft key taking points for closing arguments (0.9); confer with A. Zatz re: same (0.5); review cases in preparation for same (0.4); correspond with R. Beil, D. Mago, G. Silnicki, P. Rai and Alix re: same (0.2).	V Sachdev	6.00	8,520.00
11 December 2025	Confer with A. Zatz re: closing argument on standing and related script and slides (2.3); review and edit same (1.4); research in preparation for confirmation closing arguments (2.1).	V Sachdev	5.80	8,236.00
SUBTOTAL: Investigation of Causes of Action			**382.90**	**523,640.00**

Non-Working Travel

5 December 2025	Travel to Houston (billed at half time).	J Shore	3.00	7,500.00
5 December 2025	Travel to confirmation hearing (billed at half time).	L Miranda	3.00	3,660.00
5 December 2025	Travel to Houston (billed at half time).	J Walz	3.50	3,045.00
7 December 2025	Travel to Houston for hearing (billed at half time).	S Greissman	3.50	8,750.00
7 December 2025	Traveling to Houston (billed at half time).	A Zatz	1.10	2,310.00
12 December 2025	Travel home from Houston (billed at half time).	S Greissman	3.00	7,500.00
12 December 2025	Return travel to NYC (billed at half time).	J Shore	3.80	9,500.00
12 December 2025	Traveling back from Houston (billed at half time).	A Zatz	2.00	4,200.00
12 December 2025	Travel post confirmation hearing (billed at half time).	A Chase	1.80	2,844.00
12 December 2025	Travel back home from Confirmation Hearing (billed at half time).	L Miranda	4.20	5,124.00
12 December 2025	Travel to New York from Houston (billed at half time).	J Walz	3.90	3,393.00
SUBTOTAL: Non-Working Travel			**32.80**	**57,826.00**

Professional Retention & Fees - W&C

1 December 2025	Review potential parties in interest list (0.6); prepare for connections search re: same (0.2); review pro forma time entries or expense entries for October monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.1); revise October monthly fee	S Ludovici	1.50	1,665.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	statement (0.6).			
2 December 2025	Review and comment on W&C fee statement.	D Litz	2.50	3,425.00
2 December 2025	Follow up re: October monthly fee statement (0.3); emails with D. Litz and team re: monthly fee statements (0.1); review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (3.1); revise October monthly fee statement (0.6).	S Ludovici	4.10	4,551.00
2 December 2025	Review and finalize W&C Second Monthly Fee Statement (0.3); file same (0.1); electronically serve same (0.1).	D Hirshorn	0.50	245.00
3 December 2025	Correspond with S. Ludovici, D. Litz, and L. Miranda re: interim fee application.	V Sachdev	0.20	284.00
3 December 2025	Prepare language for first interim fee app.	D Litz	0.80	1,096.00
3 December 2025	Coordinate late night print job for G. Pesce (0.2); draft supplemental declaration (0.6); revise monthly fee statement (0.6); emails with G. Pesce re: same (0.2); draft November monthly fee statement (0.2); draft first interim fee application (0.4); review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.8); extensive correspondence with G. Pesce, A. Zatz and S. Greissman re: monthly fee statements (0.3).	S Ludovici	3.30	3,663.00
4 December 2025	Review report for connections disclosure and draft supplemental declaration (1.3); draft November monthly fee statement (0.6); review pro forma time entries or expense entries for November monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality (0.2); revise interim fee application (0.1).	S Ludovici	2.20	2,442.00
5 December 2025	Review September monthly fee statement issue (0.1); revise November monthly fee statement (0.3); email with A. Venes re: motion to seal supplemental decs (0.1); revise Pesce supplemental declaration (0.1); review draft interim fee application (0.1); emails with W&C team re: November monthly fee statement (0.1); review and revise motion to seal (0.5); email with G. Pesce re: same (0.2); emails with G. Pesce re: supplemental declaration and re: November monthly fee statement (0.2).	S Ludovici	1.70	1,887.00
5 December 2025	Precedent for joinders in motions to seal supplemental declarations (0.2); draft Committee's motion to seal supplemental declarations per S. Ludovici (1.1); emails with S. Ludovici re: same (0.1); Assist with finalizing for, e-filing and service of W&C's Third Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for Period from	A Venes	1.80	882.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	November 1, 2025 to and including November 30, 2025 per S. Ludovici (0.4).			
6 December 2025	Email with D. Hirshorn re: motion to seal.	S Ludovici	0.10	111.00
6 December 2025	Review and respond to emails S. Ludovici re: filing motion to seal and Second Supplemental Declaration of G. Pesce in Support of W&C Retention Application (0.1); review and finalize motion to seal (0.1); file same (0.1); redact Second Supplemental Declaration of G. Pesce in Support of W&C Retention Application (0.2); finalize sealed version of same (0.1); file redacted version of Second Supplemental Declaration of G. Pesce in Support of W&C Retention Application (0.1); file sealed version of same (0.1); electronically serve same (0.1).	D Hirshorn	0.90	441.00
7 December 2025	Draft interim fee application.	S Ludovici	0.50	555.00
8 December 2025	Research for G. Pesce re: interim fee application (0.3); email with G. Pesce re: interim fee application (0.1).	S Ludovici	0.40	444.00
9 December 2025	Finalize interim fee application for filing.	S Ludovici	0.20	222.00
9 December 2025	Review and finalize W&C First Fee Application (0.3); file same (0.2); electronically serve same (0.1).	D Hirshorn	0.60	294.00
10 December 2025	Draft supplemental declaration.	S Ludovici	0.40	444.00
12 December 2025	Review confirmation impact on fee application process.	S Ludovici	0.40	444.00
15 December 2025	Emails with G. Pesce and S. Greissman re: fee issues.	S Ludovici	0.30	333.00
16 December 2025	Analyze final fee application provisions of Plan (0.4); email with Alix re: same (0.2); review October monthly fee statement issue (0.1); Emails with G. Pesce re: October monthly fee statement (0.1).	S Ludovici	0.80	888.00
17 December 2025	Email with W&C team re: supplemental declaration.	S Ludovici	0.10	111.00
17 December 2025	Review and respond to email from S. Ludovici re: assistance with submission of G. Pesce third supplemental declaration in support of W&C Retention (0.1); e-file declaration (0.1); confirm filing with S. Ludovici (0.1); perform email service including Chambers (0.2).	A Venes	0.50	245.00
18 December 2025	Review final fee application preparation.	S Greissman	0.40	1,000.00
18 December 2025	Review W&C fee application issue (0.1); review draft Alix monthly fee application (0.3); discuss fee issue with K. Brountzas at length (1.0); review same (0.2).	S Ludovici	1.60	1,776.00
19 December 2025	Begin drafting final fee application (0.2); emails with G. Pesce, and with LW, and with AlixPartners re: fee	S Ludovici	0.70	777.00

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	applications (0.2); emails with W&C team re: final fee application drafting (0.3).			
22 December 2025	Draft and revise narrative summaries for each project category re: final fee application (3.0); analyze time entries re: same (2.3); analyze case docket re: same (2.0).	R Beil	7.30	9,344.00
24 December 2025	Draft final fee application.	S Ludovici	0.80	888.00
SUBTOTAL: Professional Retention & Fees - W&C			**34.60**	**38,457.00**

Professional Retention & Fees - Other

3 December 2025	Review and finalize AlixPartners Second Monthly Fee Statement (0.1); file same (0.1); electronically serve same (0.1).	D Hirshorn	0.30	147.00
16 December 2025	Emails with FTI re: final fee application (0.2); email with J. Weichselbaum (Latham) re: final fee application (0.1); call with same re: same (0.1).	S Ludovici	0.40	444.00
18 December 2025	Review AlixPartners fee statement descriptions for privilege issues and confer with W&C team re: same.	D Litz	1.20	1,644.00
18 December 2025	Assist team with submission and service of AlixPartners's third monthly fee statement (0.2); update pleadings file and calendar (0.1).	A Venes	0.30	147.00
SUBTOTAL: Professional Retention & Fees - Other			**2.20**	**2,382.00**

TOTAL	**2,192.30**	**3,114,550.00**

Exhibit D

Summary of Expenses by Category

Category	Amount
Airfare	$12,380.78
Business Meals	$1,905.77
Certification of a Document by the County Clerk	$335.80
Computer Services	$16.00
Courier Service	$442.92
Court Costs	$100.00
Deposition Transcripts	$58,769.33
Document Research	$12.00
E-Discovery Data Hosting / Storage	$1,081.10
E-Discovery Data Processing	$105.00
E-Discovery User Fees	$2,100.00
Express Mail	$82.21
External Document Production	$31,128.22
Hotel Expense	$29,154.76
Overtime Meals	$863.19
Taxi - Business	$5,942.18
Taxi - Overtime	$454.37
Train - Out of Town	$485.10
Travel Meals	$2,312.58
Grand Total	**$147,671.31**

Exhibit E

Detailed Statement of Expenses

Name	Date	English Narrative	Category	Amount
Wick, Katie	10/29/2025	Overtime Transportation US - OT Meal - 29-Oct-25	Taxi - Overtime	$32.92
Sullivan, Janet	11/1/2025	E-Discovery User Fees	E-Discovery User Fees	$1,275.00
Sullivan, Janet	11/1/2025	E-Discovery Data Hosting / Storage	E-Discovery Data Hosting / Storage	$541.07
Wick, Katie	11/6/2025	Overtime Meals US - Katie Wick - OT Meal - 06-Nov-25	Overtime Meals	$30.73
Sullivan, Janet	11/10/2025	Madison Avenue	E-Discovery Data Processing	$35.00
Wick, Katie	11/13/2025	Overtime Meals US - Katie Wick - OT Meal - 13-Nov-25	Overtime Meals	$30.73
Wick, Katie	11/17/2025	Overtime Meals US - Katie Wick - OT Meal - 17-Nov-25	Overtime Meals	$29.36
Wick, Katie	11/18/2025	Overtime Meals US - Katie Wick - OT Meal - 18-Nov-25	Overtime Meals	$35.00
Sullivan, Janet	11/22/2025	Jupiter; Madison Avenue	E-Discovery Data Processing	$35.00
Sullivan, Janet	12/1/2025	E-Discovery Data Hosting / Storage	E-Discovery Data Hosting / Storage	$540.03
Sullivan, Janet	12/1/2025	E-Discovery User Fees	E-Discovery User Fees	$825.00
Galvan, Paolo	12/2/2025	Jupiter; Madison Avenue	E-Discovery Data Processing	$35.00
Wick, Katie	12/2/2025	Certified Document Charges - Hearing Transcript - 02-Dec-25	Certification of a Document by the County Clerk	$167.90
Greissman, Scott	12/4/2025	Veritext, LLC. Invoice Date: 01 December 2025. Transcript Services - Certified Transcript | Witness: David Mounts Gonzales | Job #: 7765104 | Job Date: 11/26/2025	Deposition Transcripts	$2,448.45
Greissman, Scott	12/4/2025	Veritext, LLC. Invoice Date: 02 December 2025. Video - Digitizing & Transcript Synchronization | Witness: Heath Sampson | Job #: 7742202 | Job Date: 11/11/2025	Deposition Transcripts	$602.50
Greissman, Scott	12/4/2025	Veritext, LLC. Invoice Date: 02 December 2025. Video - Initial Services | Witness: David Mounts Gonzales | Job #: 7742252 | Job Date: 11/14/2025	Deposition Transcripts	$2,320.00
Greissman, Scott	12/4/2025	Veritext, LLC. Invoice Date: 02 December 2025. Video - Digitizing & Transcript Synchronization | Witness: Barbara Gutierrez | Job #: 7732620 | Job Date: 11/5/2025	Deposition Transcripts	$1,011.25
Greissman, Scott	12/4/2025	Veritext, LLC. Invoice Date: 03 December 2025. Video - Initial Services | Witness: Chad Shandler | Job #: 7757416 | Job Date: 11/19/2025	Deposition Transcripts	$1,380.00
Wick, Katie	12/4/2025	Overtime Transportation US - OT Transportation - 04-Dec-25	Taxi - Overtime	$46.88
Zakia, Jason	12/4/2025	Hotel stay by Zakia, Jason at The Ritz - Carlton in Boston, Massachusetts for 2 days, 1 nights for ModivCare matter.	Hotel Expense	$569.45
Zakia, Jason	12/4/2025	Hotel - Dinner - Attend depositions - 18-Nov-2025 - Internal Guest J. Zakia - Attend depositions - 18-Nov-2025	Travel Meals	$66.77

Name	Date	English Narrative	Category	Amount
Zakia, Jason	12/4/2025	Car Service for Zakia, Jason from ORD to Residence on 21-Nov-2025	Taxi - Business	$120.00
Zakia, Jason	12/4/2025	Car Service for Zakia, Jason from Residence to ORD on 23-Nov-2025	Taxi - Business	$152.18
Zakia, Jason	12/4/2025	Car Service for Zakia, Jason from BOS to 10 Avery St, Boston on 23-Nov-2025	Taxi - Business	$76.70
Zakia, Jason	12/4/2025	Hotel - Dinner - Attend depositions - 20-Nov-2025 - Internal Guest J. Zakia - Attend depositions - 20-Nov-2025	Travel Meals	$32.94
Zakia, Jason	12/4/2025	Car Service for Zakia, Jason from 1221 Avenue of the Americas, New York to LGA on 21-Nov-2025	Taxi - Business	$109.59
Zakia, Jason	12/4/2025	One Way, Economy airfare/fee on American Airline from LGA to ORD for Zakia, Jason on 11/21/2025 to Attend depositions	Airfare	$301.49
Zakia, Jason	12/4/2025	One Way, Economy airfare/fee on American Airline from ORD to BOU for Zakia, Jason on 11/23/2025 to Attend depositions	Airfare	$299.49
Zakia, Jason	12/4/2025	Hotel stay by Zakia, Jason at Westin Hotel & Resort in Short Hills, New Jersey for 3 days, 2 nights for ModivCare matter.	Hotel Expense	$1,000.00
Greissman, Scott	12/5/2025	Courier Services: 12/05/2025 - 12/17/2025 | Houston Office	Courier Service	$31.25
Miranda, Loredana	12/5/2025	Taxi for Miranda, Loredana from 1221 Avenue of the Americas, New York to Residence on 12-Nov-2025	Taxi - Overtime	$88.48
Greissman, Scott	12/8/2025	Veritext, LLC. Invoice Date: 05 December 2025. Transcript Services - Certified Transcript | ModivCare Inc., Et Al. v. (25-90309 (ARP))	Deposition Transcripts	$6,293.50
Greissman, Scott	12/8/2025	Courier Services: 12/05/2025 - 12/17/2025 | Houston Office	Courier Service	$137.80
Wick, Katie	12/8/2025	Certified Document Charges - Hearing Transcript - 08-Dec-25	Certification of a Document by the County Clerk	$167.90
Greissman, Scott	12/9/2025	Witness: Scott A. Kern - Job #: 7732627 | Job Date: 11/6/2025 - Case: ModivCare Inc., Et Al. v. (2590309(ARP))	Deposition Transcripts	$1,480.00
Greissman, Scott	12/9/2025	Witness: Chad Shandler - Job #: 7686930 | Job Date: 10/28/2025 - Case: ModivCare Inc., Et Al. v. (2590309(ARP))	Deposition Transcripts	$660.00
Greissman, Scott	12/9/2025	Courier Services: 12/05/2025 - 12/17/2025 | Houston Office	Courier Service	$57.80
Greissman, Scott	12/10/2025	Courier Services: 12/05/2025 - 12/17/2025 | Houston Office	Courier Service	$16.25
Wick, Katie	12/10/2025	Overtime Meals US - Katie Wick - OT Meal 12.10 - 10-Dec-25	Overtime Meals	$31.89
Greissman, Scott	12/11/2025	Courier Services: 12/05/2025 - 12/17/2025 | Houston Office	Courier Service	$132.80
Koster, Charles	12/11/2025	Taxi for Koster, Charles from Residence to 3700 Westheimer, Houston on 06-Dec-2025	Taxi - Business	$15.55
Koster, Charles	12/11/2025	Taxi for Koster, Charles from 2503 Maconda Ln, Houston to Residence on 07-Dec-2025	Taxi - Business	$10.73
Koster, Charles	12/11/2025	Breakfast - Team meal - 07-Dec-2025 - Internal Guest C. Koster - Team meal - 07-Dec-2025	Business Meals	$28.26
Greissman, Scott	12/15/2025	Veritext, LLC. Invoice Date: 14 November 2025. Transcript Services - Original Transcript(s) | ModivCare Inc., Et Al. v.	Deposition Transcripts	$8,904.28
Greissman, Scott	12/15/2025	Veritext, LLC. Invoice Date: 04 December 2025. Video - Digitizing & Transcript Synchronization - ModivCare Inc., Et Al. v.	Deposition Transcripts	$445.00
Greissman, Scott	12/15/2025	Veritext, LLC. Invoice Date: 13 December 2025. Deposition Transcripts | Job #: 7753481 | Job Date: 11/17/2025 | Case: ModivCare Inc., Et Al. v. (2590309) | Witness: Kevin Glodowski	Deposition Transcripts	$2,380.00

Name	Date	English Narrative	Category	Amount
Greissman, Scott	12/15/2025	Blowback with Assembly - MODIVCARE EXHIBITS CM 1908759-0002	External Document Production	$31,128.22
Greissman, Scott	12/15/2025	Witness: Daniel B. Silvers - Job #: 7742224 | Job Date: 11/13/2025 - Case: ModivCare Inc., Et Al. v. (2590309)	Deposition Transcripts	$2,350.00
Bourgault, Jacob	12/16/2025	Dinner - Dinner. - 09-Dec-2025 - Internal Guest J. Bourgault - Dinner. - 09-Dec-2025	Overtime Meals	$21.11
Bourgault, Jacob	12/16/2025	Dinner - Dinner for Jacob and Jacko Walz. - 11-Dec-2025 - Internal Guest J. Bourgault/J. Walz - Dinner for Jacob and Jacko Walz. - 11-Dec-2025	Overtime Meals	$55.13
Bourgault, Jacob	12/16/2025	Dinner - Trial Team Dinner. - 10-Dec-2025 - Internal Guest J. Bourgault - Trial Team Dinner. - 10-Dec-2025	Overtime Meals	$39.76
Bourgault, Jacob	12/16/2025	Dinner - Internal Guest J. Bourgault/A. Zatz - Dinner for Jacob & Andrew Zatz – Uber Eats - 07-Dec-2025	Overtime Meals	$86.57
Bourgault, Jacob	12/16/2025	Dinner - Internal Guest J. Bourgault/A. Chase/L. Miranda - Dinner for Jacob, Ashely Chase, and Loredana Miranda – Uber Eats - 05-Dec-2025	Overtime Meals	$130.18
Bourgault, Jacob	12/16/2025	Dinner - Dinner. - 08-Dec-2025 - Internal Guest J. Bourgault - Dinner. - 08-Dec-2025	Overtime Meals	$37.96
Greissman, Scott	12/16/2025	Texas Southern Bankruptcy Court. Invoice Date: 24 November 2025.	Court Costs	$100.00
Koster, Charles	12/16/2025	Taxi for Koster, Charles from 1510 Capitol St, Houston to 2700 Milam St, Houston on 11-Dec-2025	Taxi - Business	$10.72
Koster, Charles	12/16/2025	Taxi for Koster, Charles from 2700 Milam St, Houston to Residence on 11-Dec-2025	Taxi - Business	$16.70
Koster, Charles	12/16/2025	Taxi for Koster, Charles from 609 Main St, Houston to Residence on 10-Dec-2025	Taxi - Business	$19.14
Koster, Charles	12/16/2025	Taxi for Koster, Charles from Residence to 617 Caroline St, Houston on 10-Dec-2025	Taxi - Business	$21.29
Shore, Christopher	12/16/2025	Hotel - Dinner - ModivCare trial - dinner - 05-Dec-2025 - Internal Guest C. Shore - ModivCare trial - dinner - 05-Dec-2025	Travel Meals	$113.10
Shore, Christopher	12/16/2025	Hotel - Dinner - ModivCare trial - dinner - 09-Dec-2025 - Internal Guest C. Shore - ModivCare trial - dinner - 09-Dec-2025	Travel Meals	$70.00
Shore, Christopher	12/16/2025	Hotel - Dinner - ModivCare trial - dinner - 10-Dec-2025 - Internal Guest C.Shore - ModivCare trial - dinner - 10-Dec-2025	Travel Meals	$70.00
Shore, Christopher	12/16/2025	Hotel - Dinner - ModivCare trial - dinner - 07-Dec-2025 - Internal Guest C.Shore - ModivCare trial - dinner - 07-Dec-2025	Travel Meals	$70.00
Venes, Aileen	12/16/2025	Dinner - Working dinner - 03-Dec-2025 - Internal Guest A.Venes - Working dinner - 03-Dec-2025	Overtime Meals	$32.31
Zakia, Jason	12/16/2025	Car Service for Zakia, Jason from Residence to ORD on 05-Dec-2025	Taxi - Business	$123.05
Zakia, Jason	12/16/2025	Hotel - Dinner - ModivCare attend confirmation hearing. - 06-Dec-2025 - Internal Guest J. Zakia - ModivCare attend confirmation hearing. - 06-Dec-2025	Travel Meals	$30.82
Zakia, Jason	12/16/2025	Hotel - Dinner - ModivCare attend confirmation hearing. - 11-Dec-2025 - Internal Guest J. Zakia - ModivCare attend confirmation hearing. - 11-Dec-2025	Travel Meals	$33.62
Zakia, Jason	12/16/2025	Car Service for Zakia, Jason from 806 Main St Houston to IAH on12-Dec-2025	Taxi - Business	$128.63
Zakia, Jason	12/16/2025	Hotel - Dinner - ModivCare attend confirmation hearing. - 07-Dec-2025 - Internal Guest J. Zakia - ModivCare attend confirmation hearing. - 07-Dec-2025	Travel Meals	$68.27
Zakia, Jason	12/16/2025	One Way, Economy airfare/fee on American Airline from ORD to IAH for Zakia, Jason on 12/05/2025 for Confirmation Hearing	Airfare	$286.48

Name	Date	English Narrative	Category	Amount
Zakia, Jason	12/16/2025	Car Service for Zakia, Jason from ORD to Residence on 12-Dec-2025	Taxi - Business	$131.64
Zakia, Jason	12/16/2025	Hotel stay by Zakia, Jason at JW Marriot Houston in Houston, Texas for 8 days, 7 nights for ModivCare matter.	Hotel Expense	$2,994.03
Zakia, Jason	12/16/2025	Car Service for Zakia, Jason from IAH to 806 Main St Houston on 05-Dec-2025	Taxi - Business	$117.55
Zakia, Jason	12/16/2025	One Way, Business airfare/fee on American Airline from IAH to ORD for Zakia, Jason on 12/12/2025 for Confirmation Hearing (billed at 50%).	Airfare	$225.24
Zakia, Jason	12/16/2025	Hotel - Dinner - ModivCare attend confirmation hearing. - 10-Dec-2025 - Internal Guest J. Zakia - ModivCare attend confirmation hearing. - 10-Dec-2025	Travel Meals	$70.00
Zakia, Jason	12/16/2025	Hotel - Dinner - ModivCare attend confirmation hearing. - 08-Dec-2025 - Internal Guest J. Zakia - ModivCare attend confirmation hearing. - 08-Dec-2025	Travel Meals	$70.00
Zakia, Jason	12/16/2025	Hotel - Dinner - ModivCare attend confirmation hearing. - 11-Dec-2025 - Internal Guest J. Zakia - ModivCare attend confirmation hearing. - 11-Dec-2025	Travel Meals	$70.00
Greissman, Scott	12/17/2025	Veritext, LLC. Invoice Date: 15 December 2025. Transcript Services - Certified Transcript - Priority Request | ModivCare Inc, Et Al. v.	Deposition Transcripts	$4,974.29
Wick, Katie	12/17/2025	DELIVERY SERVICES FedEx -12/05/2025- Katie Wick FROM White & Case LLP-1221 Avenue of Americas NEW YORK CITY NY 10020 US TO Scott Greissman SCARSDALE NY	Express Mail	$82.21
Zatz, Andrew	12/17/2025	One Way, Economy airfare/fee on United Airlines Inc. from HOU to NJ for Zatz, Andrew on 12/12/2025 for Seat Upgrade	Airfare	$42.99
Zatz, Andrew	12/17/2025	Taxi for Zatz, Andrew from EWR to residence on 12-Dec-2025	Taxi - Business	$56.23
Zatz, Andrew	12/17/2025	Taxi for Zatz, Andrew from IAH to 609 Main St Ste 2900, Houston 07-Dec-2025	Taxi - Business	$50.57
Zatz, Andrew	12/17/2025	Hotel - Breakfast - Hotel stay during Houston travel - 11-Dec-2025 - Internal Guest A.Zatz - Hotel stay during Houston travel - 11-Dec-2025	Travel Meals	$6.41
Zatz, Andrew	12/17/2025	Internet - In-flight Wi-Fi during Houston travel for Committee trial - 07-Dec-2025	Computer Services	$8.00
Zatz, Andrew	12/17/2025	Internet - In-flight Wi-Fi during Houston travel for Committee trial - 12-Dec-2025	Computer Services	$8.00
Zatz, Andrew	12/17/2025	Ticketing Fee for airfare on United Airlines Inc. from NJ to HOU for Zatz, Andrew on 12/07/2025	Airfare	$50.00
Zatz, Andrew	12/17/2025	Drinks - Coffee purchase during Houston travel - 10-Dec-2025 - Internal Guest A.Zatz - Coffee purchase during Houston travel - 10-Dec-2025	Travel Meals	$10.20
Zatz, Andrew	12/17/2025	One Way, Economy airfare/fee on United Airlines Inc. from NJ to HOU for Zatz, Andrew on 12/07/2025 for Confirmation hearing	Airfare	$748.09
Zatz, Andrew	12/17/2025	Taxi for Zatz, Andrew from residence to EWR on 07-Dec-2025	Taxi - Business	$37.97
Zatz, Andrew	12/17/2025	Taxi for Zatz, Andrew from 6440 Southwest Fwy, Houston, TX to 806 Main St, Houston on 12-Dec-2025	Taxi - Business	$27.57
Zatz, Andrew	12/17/2025	Lunch - 10-Dec-2025 - Internal Guest A.Zatz - Lunch - 10-Dec-2025	Travel Meals	$16.09
Zatz, Andrew	12/17/2025	Hotel - Breakfast - Hotel stay during Houston travel - 08-Dec-2025 - Internal Guest A.Zatz - Hotel stay during Houston travel - 08-Dec-2025	Travel Meals	$6.41
Zatz, Andrew	12/17/2025	Hotel stay by Zatz, Andrew at JW Marriot Houston in Houston, Texas for 6 days, 5 nights for ModivCare matter.	Hotel Expense	$2,500.00
Chase, Ashley	12/18/2025	Taxi for Chase, Ashley from Residence to IAH on 05-Dec-2025	Taxi - Business	$112.34

Name	Date	English Narrative	Category	Amount
Chase, Ashley	12/18/2025	One Way, Economy airfare/fee on United Airlines Inc. from HOU to MIA for Chase, Ashley on 12/12/2025 for Committee trial	Airfare	$372.61
Chase, Ashley	12/18/2025	Taxi for Chase, Ashley from MIA to 455 Grand Bay Dr, Miami on 12-Dec-2025	Taxi - Business	$57.11
Chase, Ashley	12/18/2025	Hotel stay by Chase, Ashley at JW Marriot Houston in Houston, Texas for 8 days, 7 nights for ModivCare matter.	Hotel Expense	$3,156.07
Chase, Ashley	12/18/2025	Hotel - Dinner - Hotel Stay - JW Marriott Houston Downtown (dinner) - 12-Dec-2025 - Internal Guest A.Chase - Hotel Stay - JW Marriott Houston Downtown (dinner) - 12-Dec-2025	Travel Meals	$40.75
Chase, Ashley	12/18/2025	Ticketing Fee for airfare on United Airlines Inc. from HOU to MIA for Chase, Ashley on 12/12/2025	Airfare	$50.00
Chase, Ashley	12/18/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from LGA to HOU for Chase, Ashley on 12/05/2025 for Flight to HOU for ModivCare matters.	Airfare	$498.62
Chase, Ashley	12/18/2025	Taxi for Chase, Ashley from 1221 Avenue of the Americas, New York to Residence on 12-Nov-25	Taxi - Overtime	$32.53
Chase, Ashley	12/18/2025	Ticketing Fee for airfare on Delta Airlines Inc. from LGA to HOU for Chase, Ashley on 12/05/2025	Airfare	$50.00
Chase, Ashley	12/18/2025	Taxi for Chase, Ashley from 15 W 72nd St, New York to 1221 Avenue of the Americas, New York on 13-Nov-2025	Taxi - Business	$39.53
Chase, Ashley	12/18/2025	Taxi for Chase, Ashley from Residence to IAH on12-Dec-2025	Taxi - Business	$62.66
Chase, Ashley	12/18/2025	Dinner - Dinner - 06-Dec-2025 - Internal Guest A.Chase - Dinner - 06-Dec-2025	Travel Meals	$29.88
Greissman, Scott	12/18/2025	Witness: ModivCare Hearing , Dec 9	Deposition Transcripts	$4,500.82
Walz, Jacko	12/18/2025	New York Law Institute, Inc. Invoice Date: 01 December 2025. Document retrieval	Document Research	$12.00
Greissman, Scott	12/19/2025	Judicial Transcribers Of Texas, LLC. Invoice Date: 19 December 2025. Deposition Transcripts | MODIVCARE, INC., ET AL / OFFICIAL TRANSCRIPTS OF CONFIRMATION DAYS ONE, TWO, AND THREE | CASE NUMBER: 25-90309-11 | Dates covered: 12/08/2025 - 12/11/2025	Deposition Transcripts	$7,592.00
Smith, Erin	12/19/2025	Baggage Fee - Excess baggage fee expense incurred while traveling for matter. - 05-Dec-2025	Airfare	$35.00
Smith, Erin	12/19/2025	Hotel - Dinner - Internal Guest E. Smith - Hotel accommodation expense incurred while traveling for matter. - 12-Dec-2025	Travel Meals	$48.64
Smith, Erin	12/19/2025	Ticketing Fee for airfare on Delta Airlines Inc. from HOU to LGA for Smith, Erin on 12/12/2025	Airfare	$84.28
Smith, Erin	12/19/2025	Lunch - E. Smith - Lunch expense incurred while traveling for matter. - 05-Dec-2025	Travel Meals	$22.45
Smith, Erin	12/19/2025	Roundtrip, Economy airfare/fee on Delta Airline Inc from LGA to HOU for Smith, Erin on 12/05/2025 for ModivCare Matter	Airfare	$682.66
Smith, Erin	12/19/2025	Ticketing Fee for airfare on Delta Airlines Inc. from LGA to HOU for Smith, Erin on 12/05/2025	Airfare	$50.00
Smith, Erin	12/19/2025	Hotel - Dinner - Internal Guest E. Smith - Hotel accommodation expense incurred while traveling for matter. - 12-Dec-2025	Travel Meals	$58.70
Smith, Erin	12/19/2025	Hotel stay by Smith, Erin at JW Marriot Houston in Houston, Texas for 8 days, 7 nights for ModivCare matter.	Hotel Expense	$3,061.08

Name	Date	English Narrative	Category	Amount
Smith, Erin	12/19/2025	Hotel stay by Smith, Erin at JW Marriott Copley Place in Boston, Massachusetts for 2 days, 1 night for ModivCare matter.	Hotel Expense	$335.66
Smith, Erin	12/19/2025	Train - NYP/BOS - 23-Nov-25 to 24-Nov-25 - Train ticket expense incurred while traveling for matter. - 22-Nov-2025	Train - Out of Town	$485.10
Smith, Erin	12/19/2025	Dinner - Meal expense incurred while traveling for matter. - 06-Dec-2025 - Internal Guest E. Smith - Meal expense incurred while traveling for matter. - 06-Dec-2025	Travel Meals	$14.79
Miranda, Loredana	12/22/2025	Lunch - Lunch with Ashley Chase - 05-Dec-2025 - Internal Guest L.Miranda/A.Chase - Lunch with Ashley Chase - 05-Dec-2025	Travel Meals	$48.20
Miranda, Loredana	12/22/2025	Dinner - Dinner - 09-Dec-2025 - Internal Guest L.Miranda - Dinner - 09-Dec-2025	Travel Meals	$26.55
Miranda, Loredana	12/22/2025	Taxi - 737 Preston St, Houston TX to 806 Main St, Houston TX - Uber ride from dinner to hotel - 08-Dec-2025	Taxi - Business	$13.98
Miranda, Loredana	12/22/2025	Ticketing Fee for airfare on Delta Airlines Inc. from NYC to HOU and HOU to NYC for Miranda, Loredana on 12/05/2025 to 12/12/2025	Airfare	$123.49
Miranda, Loredana	12/22/2025	Dinner - Dinner with Ashley Chase - 07-Dec-2025 - Internal Guest L.Miranda/A.Chase - Dinner with Ashley Chase - 07-Dec-2025	Travel Meals	$87.28
Miranda, Loredana	12/22/2025	Taxi - 702 Main St., Houston TX to 2700 Milam St. Houston TX - Uber ride from hotel to dinner - 11-Dec-2025	Taxi - Business	$25.10
Miranda, Loredana	12/22/2025	Taxi - 59 Withers St, Brooklyn, NY to LaGuardia Airport (LGA), Queens, NY - Uber from residence to airport - 05-Dec-2025	Taxi - Business	$57.88
Miranda, Loredana	12/22/2025	Hotel stay by Miranda, Loredana at JW Marriott Houston Downtown in Houston, TX for 8 days, 7 nights for ModivCare Matter	Hotel Expense	$2,994.03
Miranda, Loredana	12/22/2025	Hotel - Dinner - Dinner at hotel - 11-Dec-2025 - Internal Guest L.Miranda - Dinner at hotel - 11-Dec-2025	Travel Meals	$48.76
Miranda, Loredana	12/22/2025	Taxi - 1510 Texas Ave, Houston, TX to 806 Main St, Houston, TX - Uber ride from dinner to hotel - 11-Dec-2025	Taxi - Business	$22.30
Miranda, Loredana	12/22/2025	Taxi - 702 Main St, Houston TX to 737 Preston St, Houston TX - Uber ride from hotel to dinner - 08-Dec-2025	Taxi - Business	$16.95
Miranda, Loredana	12/22/2025	Hotel - Breakfast - Breakfast at hotel - 07-Dec-2025 - Internal Guest L.Miranda - Breakfast at hotel - 07-Dec-2025	Travel Meals	$26.86
Miranda, Loredana	12/22/2025	Lunch - Lunch with team - 07-Dec-2025 - Internal Guest L.Miranda/A.Chase/J.Bourgault/J.Walz/E.Smith - Lunch with team - 07-Dec-2025	Travel Meals	$105.85
Miranda, Loredana	12/22/2025	Ticketing Fee for airfare on Delta Airlines Inc. from HOU to NYC for Miranda, Loredana on 12/12/2025	Airfare	$50.00
Miranda, Loredana	12/22/2025	Hotel - Breakfast - Breakfast at hotel - 10-Dec-2025 - Internal Guest L.Miranda - Breakfast at hotel - 10-Dec-2025	Travel Meals	$20.86
Miranda, Loredana	12/22/2025	Taxi - 702 Main St, Houston TX to 515 Rusk St., Houston TX - Uber ride from lunch to courthouse - 11-Dec-2025	Taxi - Business	$22.26
Miranda, Loredana	12/22/2025	Lunch - Lunch with team - 06-Dec-2025 - Internal Guest L.Miranda/E.Smith/A.Chase/J.Walz/J.Bourgault - Lunch with team - 06-Dec-2025	Travel Meals	$71.40
Miranda, Loredana	12/22/2025	Taxi - George Bush Intercontinental Airport (IAH), Houston, TX to 806 Main St, Houston, TX - Uber ride from Houston airport to hotel - 05-Dec-2025	Taxi - Business	$111.56

Name	Date	English Narrative	Category	Amount
Miranda, Loredana	12/22/2025	Dinner - Dinner with Ashley Chase - 08-Dec-2025 - Internal Guest L.Miranda/A.Chase - Dinner with Ashley Chase - 08-Dec-2025	Travel Meals	$85.25
Miranda, Loredana	12/22/2025	Round Trip, Economy airfare/fee on Delta Airlines Inc. from NYC to HOU and HOU to NYC for Miranda, Loredana on 12/05/2025 to 12/12/2025 for Client Trial	Airfare	$733.41
Miranda, Loredana	12/22/2025	Taxi - 702 Main St., Houston TX to George Bush Intercontinental Airport - Uber ride from hotel to airport - 12-Dec-2025	Taxi - Business	$124.34
Miranda, Loredana	12/22/2025	Dinner - Dinner - 06-Dec-2025 - Internal Guest L.Miranda - Dinner - 06-Dec-2025	Travel Meals	$18.94
Shore, Christopher	12/22/2025	One Way, Business airfare/fee on Delta Airlines Inc. from NYC to HOU for Shore, Christopher on 12/05/2025 for ModivCare Trial	Airfare	$869.48
Shore, Christopher	12/22/2025	Ticketing Fee for airfare on Delta Airlines Inc. from NYC to HOU for Shore, Christopher on 12/05/2025	Airfare	$50.00
Shore, Christopher	12/22/2025	Taxi - New York La Guardia, NY/1221 Avenue of the Americas, New York, NY 10020 - Modivcare trial - Ride - 12-Dec-2025	Taxi - Business	$133.94
Shore, Christopher	12/22/2025	Hotel - Car Service - 1300 Lamar St, Houston, TX 77010, US/Terminal C, George Bush Intercontinental Airport (IAH), Houston, TX 77032, US - Modivcare trial - ride to airport - 12-Dec-2025	Taxi - Business	$86.97
Shore, Christopher	12/22/2025	Ticketing Fee for airfare on Delta Airlines Inc. from HOU to NYC for Shore, Christopher on 12/12/2025	Airfare	$50.00
Shore, Christopher	12/22/2025	One Way, Business airfare/fee on Delta Airlines Inc. from HOU to NYC for Shore, Christopher on 12/12/2025 for ModivCare Trial	Airfare	$1,125.18
Shore, Christopher	12/22/2025	Hotel stay by Shore, Christopher at Four Seasons Hotel Houston in Houston, TX for 8 days, 7 nights for ModivCare trial	Hotel Expense	$9.74
Shore, Christopher	12/22/2025	Hotel stay by Shore, Christopher at Four Seasons Hotel Houston in Houston, TX for 8 days, 7 nights for ModivCare trial	Hotel Expense	$5,476.11
Shore, Christopher	12/22/2025	Taxi - New York, New York / New York La Guardia, NY - ModivCare trial - ride to the airport - 05-Dec-2025	Taxi - Business	$82.53
Smith, Erin	12/22/2025	Overtime Transportation US - Taxi expense incurred for working late in the office due to a matter. - 17-Nov-25	Taxi - Overtime	$60.30
Smith, Erin	12/22/2025	Overtime Transportation US - Taxi expense incurred for working late in the office due to a matter. - 20-Oct-25	Taxi - Overtime	$51.24
Smith, Erin	12/22/2025	Taxi - Train/Hotel - Taxi expense incurred for working due to a matter. - 05-Dec-2025	Taxi - Business	$50.39
Smith, Erin	12/22/2025	Overtime Transportation US - Taxi expense incurred for working late in the office due to a matter. - 24-Nov-25	Taxi - Overtime	$55.98
Smith, Erin	12/22/2025	Taxi - Residence/Train station - Taxi expense incurred for working due to a matter. - 05-Dec-2025	Taxi - Business	$57.53
Smith, Erin	12/22/2025	Taxi - Airport/Residence - Taxi expense incurred for working due to a matter. - 12-Dec-2025	Taxi - Business	$148.80
Smith, Erin	12/22/2025	Overtime Meals US - Erin Smith - Meal expense incurred for working late in the office due to a matter. - 19-Nov-25	Overtime Meals	$25.65
Smith, Erin	12/22/2025	Overtime Transportation US - Taxi expense incurred for working late in the office due to a matter. - 20-Nov-25	Taxi - Overtime	$34.80

Name	Date	English Narrative	Category	Amount
Smith, Erin	12/22/2025	Overtime Transportation US - Taxi expense incurred for working late in the office due to a matter. - 20-Nov-25	Taxi - Overtime	$51.24
Greissman, Scott	12/24/2025	Deposition Transcripts | Case: In Re: ModivCare Inc, Et Al. v. (2590309) | Job #: 7790773 | Job Date: 12/11/2025 | Witness: ModivCare Hearing , Day 4	Deposition Transcripts	$3,482.20
Shore, Christopher	12/24/2025	Ticketing Fee for airfare on United Airlines Inc. from HOU to FL for Shore, Christopher on 10/30/2025	Airfare	$64.49
Shore, Christopher	12/24/2025	Taxi - 48 W Putnam Ave, Greenwich, CT 06830, US / Terminal C Express Dropoff, Checked-In, LaGuardia Airport (LGA), Queens, NY 11371, US - Ride going to the airport (client Trial travel) - 05-Dec-2025	Taxi - Business	$94.91
Shore, Christopher	12/24/2025	Taxi - Terminal B, Flushing, NY 11371, US/1003 Lake Ave, Greenwich, CT 06831-2712, US - Ride from the airport (client Trial travel) - 12-Dec-2025	Taxi - Business	$154.06
Shore, Christopher	12/24/2025	Taxi - Terminal A, George Bush Intercontinental Airport (IAH), Houston, TX 77032, US/ 1300 Lamar St, Houston, TX 77010, US - Ride going to the hotel (client Trial travel) - 05-Dec-2025	Taxi - Business	$66.73
Shore, Christopher	12/24/2025	Taxi - 30 S State St, Stamford, CT 06902, US / 1003 Lake Ave, Greenwich, CT 06831-2712, US - Ride for client meeting - 28-Oct-2025	Taxi - Business	$33.93
Greissman, Scott	12/25/2025	Veritext, LLC. Invoice Date: 24 December 2025. Deposition Transcripts | Case: ModivCare Inc., Et Al. v. (2590309) | Job #: 7757482 | Job Date: 11/20/2025 | Witness: Zul Jamal.	Deposition Transcripts	$2,420.00
Walz, Jacko	12/25/2025	Ticketing Fee for airfare on Delta Airlines Inc. from HOU to LGA for Walz, Jacko on 12/12/2025	Airfare	$50.00
Walz, Jacko	12/25/2025	Taxi - 609 Main St, Houston, TX to 1300 Lamar St, Houston, TX - Uber from W&C Houston office to hotel - 09-Dec-2025	Taxi - Business	$13.01
Walz, Jacko	12/25/2025	Dinner - Dinner - 08-Dec-2025 - Internal Guest J.Walz - Dinner - 08-Dec-2025	Travel Meals	$50.27
Walz, Jacko	12/25/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from HOU to LGA for Walz, Jacko on 12/12/2025 for Client Trial	Airfare	$278.12
Walz, Jacko	12/25/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from LGA to HOU for Walz, Jacko on 12/05/2025 for Client Trial	Airfare	$392.76
Walz, Jacko	12/25/2025	Dinner - Dinner - 06-Dec-2025 - Internal Guest J.Walz - Dinner - 06-Dec-2025	Travel Meals	$32.56
Walz, Jacko	12/25/2025	Taxi - 3700 N Terminal Rd, Houston, TX to 806 Main St, Houston, TX - Uber from airport to hotel - 05-Dec-2025	Taxi - Business	$50.58
Walz, Jacko	12/25/2025	Taxi - 1300 Lamar St, Houston, TX to 609 Main St Ste 2900, Houston, TX - Uber from hotel to W&C Houston office - 09-Dec-2025	Taxi - Business	$12.97
Walz, Jacko	12/25/2025	Dinner - Dinner - 07-Dec-2025 - Internal Guest J.Walz - Dinner - 07-Dec-2025	Travel Meals	$57.10
Walz, Jacko	12/25/2025	Taxi - 66 Rockwell Pl, Brooklyn, NY to LaGuardia Airport (LGA), Queens, NY - Uber from residence to airport - 05-Dec-2025	Taxi - Business	$72.92
Walz, Jacko	12/25/2025	Hotel stay by Walz, Jacko at JW Marriott Houston Downtown in Houston, TX for 8 days, 7 nights for ModivCare Matter	Hotel Expense	$3,061.08
Walz, Jacko	12/25/2025	Taxi - Terminal C Inner Arrivals Rd & Terminal C Outer Arrivals Rd, New York, NY to 66 Rockwell Pl, Brooklyn, NY - Uber from airport to residence - 12-Dec-2025	Taxi - Business	$135.06
Walz, Jacko	12/25/2025	Ticketing Fee for airfare on Delta Airlines Inc. from LGA to HOU for Walz, Jacko on 12/05/2025	Airfare	$50.00
Greissman, Scott	12/26/2025	Breakfast - Breakfast - 11-Dec-2025 - Internal Guest S.Greissman - Breakfast - 11-Dec-2025	Travel Meals	$16.34

Name	Date	English Narrative	Category	Amount
Greissman, Scott	12/26/2025	One Way, Business airfare/fee on Delta Airlines Inc. from HOU to LGA for Greissman, Scott on 12/11/2025 for Client Trial	Airfare	$1,455.24
Greissman, Scott	12/26/2025	Dinner - Closing dinner - 11-Dec-2025 - Internal Guest S.Greissman/A.Chase/A.Zatz/C.West/C.Shore/L.Miranda/J.Walz - Closing dinner - 11-Dec-2025	Business Meals	$1,877.51
Greissman, Scott	12/26/2025	Additional Fee for airfare on Delta Airlines Inc. from HOU to NJ for Greissman, Scott on 12/12/2025	Airfare	$521.04
Greissman, Scott	12/26/2025	Hotel - Car Service - Hotel to W&C Houston office - Hotel car service during Houston travel - 10-Dec-2025	Taxi - Business	$160.65
Greissman, Scott	12/26/2025	Hotel - Breakfast - Hotel breakfast during Houston travel - 11-Dec-2025 - Internal Guest S.Greissman - Hotel breakfast during Houston travel - 11-Dec-2025	Travel Meals	$8.58
Greissman, Scott	12/26/2025	Hotel - Dinner - Hotel for Houston travel - 08-Dec-2025 - Internal Guest S.Greissman - Hotel for Houston travel - 08-Dec-2025	Travel Meals	$457.12
Greissman, Scott	12/26/2025	One Way, Business airfare/fee on Delta Airlines Inc. from LGA to HOU for Greissman, Scott on 12/07/2025 for Client Trial	Airfare	$1,344.88
Greissman, Scott	12/26/2025	Hotel - Breakfast - Breakfast at hotel for Houston travel - 10-Dec-2025 - Internal Guest S.Greissman - Breakfast at hotel for Houston travel - 10-Dec-2025	Travel Meals	$17.16
Greissman, Scott	12/26/2025	Hotel stay by Greissman, Scott at Four Seasons Hotel Houston in Houston, TX for 5 days, 4 nights for ModivCare Matter	Hotel Expense	$2,437.16
Greissman, Scott	12/26/2025	Ticketing Fee for airfare on Delta Airlines Inc. from NYC to HOU for Greissman, Scott on 12/07/2025	Airfare	$50.00
Greissman, Scott	12/26/2025	Hotel - Car Service - Hotel to Houston TX airport - Hotel car service for Houston travel - 11-Dec-2025	Taxi - Business	$162.65
Greissman, Scott	12/26/2025	Lunch - Lunch at airport - 12-Dec-2025 - Internal Guest S.Greissman - Lunch at airport - 12-Dec-2025	Travel Meals	$14.12
Greissman, Scott	12/26/2025	Hotel stay by Greissman, Scott at Four Seasons Hotel Houston in Houston, TX for 2 days, 1 nights for ModivCare Matter	Hotel Expense	$507.94
Greissman, Scott	12/26/2025	Ticketing Fee for airfare on Delta Airlines Inc. from HOU to NYC for Greissman, Scott on 12/11/2025	Airfare	$50.00
Shore, Christopher	12/26/2025	Taxi - Terminal A, George Bush Intercontinental Airport (IAH), Houston, TX 77032, US/ 1300 Lamar St, Houston, TX 77010, US - ModivCare ride - 05-Dec-2025	Taxi - Business	$6.67
Shore, Christopher	12/26/2025	Courier - Matter related document - 05-Dec-25	Courier Service	$67.02
Walz, Jacko	12/26/2025	Taxi - W&C NY office to 200 Park Ave, New York, NY - Uber ride from W&C NY office to Paul Hastings office for client deposition - 17-Nov-2025	Taxi - Business	$29.72
Walz, Jacko	12/26/2025	`	Taxi - Business	$26.98
Wick, Katie	12/26/2025	CAR SERVICE INVOICE#103235660-11/05/2025-Katie Wick- Sunnys RECEIPT ID11171720-10020 1003 Lake Ave, Greenwich, CT 06831, USA 06831 60	Taxi - Business	$233.33
Zakia, Jason	12/26/2025	CAR SERVICE INVOICE#103235660-11/12/2025-Jason Zakia- Sunnys RECEIPT ID11178369-06103 W Boston, Stuart Street, Boston, Massachusetts, USA 02116 160	Taxi - Business	$654.67
Zakia, Jason	12/26/2025	CAR SERVICE INVOICE#103235660-11/11/2025-Jason Zakia- Sunnys RECEIPT ID11178366-06519 Hartford Marriott Downtown, Columbus Boulevard, Hartford, CT, USA 06103 63	Taxi - Business	$309.53

Name	Date	English Narrative	Category	Amount
Greissman, Scott	12/29/2025	CAR SERVICE INVOICE#103235734-12/07/2025-Scott Greissman- Carey RECEIPT ID11194031-77032 1300 Lamar Street, Houston, TX, USA 77010 32	Taxi - Business	$211.51
Greissman, Scott	12/29/2025	CAR SERVICE INVOICE#103235734-12/12/2025-Scott Greissman- Sunnys RECEIPT ID11194725-07114 147 Moorland Drive, Scarsdale, NY, USA 10583 59	Taxi - Business	$296.75
Greissman, Scott	12/29/2025	CAR SERVICE INVOICE#103235734-12/07/2025-Scott Greissman- NY Black Car RECEIPT ID11190141-10583 LaGuardia Airport 11371 36	Taxi - Business	$336.31
Moe, Khin	12/29/2025	CAR SERVICE INVOICE#103235734-11/22/2025-ERIN Schmidt- Sunnys RECEIPT ID11189285-10020 615 Carroll St, Brooklyn, NY 11215, USA 11215 17	Taxi - Business	$126.03
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 10-Nov-25	Overtime Meals	$35.00
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 08-Oct-25	Overtime Meals	$35.00
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 05-Nov-25	Overtime Meals	$35.00
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 17-Nov-25	Overtime Meals	$32.97
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 28-Oct-25	Overtime Meals	$35.00
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 22-Oct-25	Overtime Meals	$35.00
Walz, Jacko	12/30/2025	Overtime Meals US - Jacko Walz - Dinner - 12-Nov-25	Overtime Meals	$35.00
Walz, Jacko	12/30/2025	Dinner - Dinner during Houston travel - 30-Oct-2025 - Internal Guest J.Walz - Dinner during Houston travel - 30-Oct-2025	Travel Meals	$99.54
Walz, Jacko	12/30/2025	Taxi - 1300 Lamar St, Houston, TX to 609 Main St Ste 2900, Houston, TX - Uber from hotel to W&C Houston office - 30-Oct-2025	Taxi - Business	$10.90
Walz, Jacko	12/30/2025	Taxi - 66 Rockwell Pl, Brooklyn, NY to LaGuardia Airport (LGA), Queens, NY - Uber from residence to airport - 29-Oct-2025	Taxi - Business	$96.16
Walz, Jacko	12/30/2025	Ticketing Fee for airfare on American Airlines from IAH to DFW for Walz, Jacko on 10/31/2025	Airfare	$50.00
Walz, Jacko	12/30/2025	Taxi - George Bush Intercontinental Airport (IAH), Houston, TX to 1300 Lamar St, Houston, TX - Uber from airport to hotel - 29-Oct-2025	Taxi - Business	$53.98
Walz, Jacko	12/30/2025	Taxi - 1200 Mckinney St, Houston, TX to George Bush Intercontinental Airport (IAH), Houston, TX - Uber from dinner to airport - 30-Oct-2025	Taxi - Business	$69.13
Walz, Jacko	12/30/2025	Ticketing Fee for airfare on Delta Airlines Inc. from DFW to NYC for Walz, Jacko on 10/31/2025	Airfare	$50.00
Walz, Jacko	12/30/2025	Ticketing Fee for airfare on Delta Airlines Inc. from LGA to IAH for Walz, Jacko on 10/29/2025	Airfare	$50.00
Walz, Jacko	12/30/2025	One Way, Economy airfare/fee on American Airlines from IAH to DFW for Walz, Jacko on 10/31/2025 for ModivCare matter	Airfare	$340.38
Walz, Jacko	12/30/2025	Hotel stay by Walz, Jacko at Four Seasons Hotel Houston in Houston, TX for 2 days, 1 nights for ModivCare Matter	Hotel Expense	$700.40
Walz, Jacko	12/30/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from LGA to IAH for Walz, Jacko on 10/29/2025 for ModivCare matter	Airfare	$369.18
Walz, Jacko	12/30/2025	One Way, Economy airfare/fee on Delta Airlines Inc. from DFW to NYC for Walz, Jacko on 10/31/2025 for ModivCare matter	Airfare	$486.18

Name	Date	English Narrative	Category	Amount
Walz, Jacko	12/30/2025	Taxi - LaGuardia Airport (LGA), Queens, NY to 66 Rockwell Pl, Brooklyn, NY - Uber from airport to residence - 31-Oct-2025	Taxi - Business	$71.06
Walz, Jacko	12/30/2025	Hotel stay by Walz, Jacko at Houston Airport Marriot in Houston, TX for 2 days, 1 nights for ModivCare Matter	Hotel Expense	$352.01
Greissman, Scott	12/31/2025	Veritext, LLC. Invoice Date: 19 December 2025. Transcript Services - Certified Transcript - Priority Request | ModivCare Inc, Et Al.	Deposition Transcripts	$3,070.04
Wick, Katie	12/31/2025	Overtime Meals US - Katie Wick - OT Meal - 31-Dec-25	Overtime Meals	$33.84
Greissman, Scott	1/2/2026	Veritext, LLC. Invoice Date: 02 January 2026. Job date: 17 Nov 2026. Video - Digitizing & Transcript Synchronization | ModivCare Inc., Et Al. v.	Deposition Transcripts	$2,455.00

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

In re:	Chapter 11
MODIVCARE, INC., *et al.,*[1]	Case No. 25-90309 (ARP)
Reorganized Debtors.	(Jointly Administered)
	Objection Deadline: March 4, 2026 @ 4:00 p.m. (CT)

SUMMARY COVER SHEET TO THE FINAL FEE APPLICATION OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	**Financial Advisor to the Official Committee of Unsecured Creditors**	
Docket No. of Employment Order(s):	**November 4, 2025, effective as of September 10, 2025 [Docket No. 654]**	
Interim Application ( ) No. _____ Final Application (X)		
	Beginning Date	**End Date**
Time period covered by this Application for which interim compensation has not previously been awarded:	09/10/2025	12/29/2025
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? **Yes**		

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? **Yes**
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? **Yes**
Do expense reimbursements represent actual and necessary expenses incurred? **Yes**

Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	$4,955,847.00
Total professional hours covered by this Application:	4,671.3
Average hourly rate for professionals:	$1,060.91
Total paraprofessional fees requested in this Application:	$0.00
Total paraprofessional hours covered by this Application:	N/A
Average hourly rate for paraprofessionals:	N/A
Total fees requested in this Application:	$4,980,847.00[2]
Total expense reimbursements requested in this Application:	$41,910.29
Total fees and expenses requested in this Application:	**$5,022,757.29**
Total fees and expenses awarded in all prior Applications:	**$0.00**

Plan Status: On December 15, 2025, after a hearing before the United States Bankruptcy Court for the Southern District of Texas (the "Court"), the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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], approving, among other things, the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (the "Plan"). The effective date of the Plan occurred on December 29, 2025.

[2] The Application does not include actual fees incurred after December 29, 2025 in connection with the preparation and prosecution of this Application. Accordingly, AlixPartners requests allowance of up to $25,000.00 for fees incurred or expected to be incurred after the Effective Date (as defined herein) in connection therewith (the "Post-Effective Date Fees"). For the avoidance of doubt, AlixPartners shall invoice the lesser of (i) its actual, reasonable, and necessary Post-Effective Date Fees or (ii) $25,000.00.

Primary Benefits:
During the case, AlixPartners advised and assisted the Committee and its counsel at White & Case ("W&C") with several workstreams that provided numerous benefits, including:

- performing due diligence on the Debtors' financial projections and valuation
- drafting of expert business plan and valuation reports and providing expert testimony at the confirmation trial
    - business plan expert report identified numerous opportunities to enhance the Debtors' projected EBITDA
- supporting an objection to the Debtors' DIP financing motion with analysis and testimony, resulting in material changes to the DIP financing order in favor of unsecured creditors
- providing insight and analysis into the Debtors' initial Plan and Disclosure Statement and assisting W&C with a Disclosure Statement objection, which resulted in the Debtors amending the Plan to increase recoveries to general unsecured creditors
- performing analysis on the Company's liquidity, including various sensitivity scenarios
- undertaking diligence and financial analysis related to various motions and objections, including challenges on liens, section 552 and historical transactions
- evaluating unsecured creditor recovery estimates under various scenarios
- investigating potential causes of action against various parties
- reviewing and providing analysis of filed and schedule claims as well as the Debtors' schedules and statements
- performing various ad hoc financial analysis supporting W&C, including analysis on the "first day" motions and United Healthcare settlement
- analyzing and evaluating the reasonableness of the engagement terms and conditions proposed by Debtors' retained professionals
- assisting W&C with numerous motions filed with the court including:
    - investigating the prepetition liability management exercise and related causes of action
    - investigating secured lenders' liens on certain of the Debtors' assets earned pre- and post-petition
- assisting W&C with extensive discovery related to the DIP, Plan and various motions and complaints, including document review, numerous depositions and Company interviews, and preparing for and participating in various meetings with parties in the case
- working with W&C to prepare for the confirmation hearing including witness preparation and providing insight and financial analysis used during trial
- communication with the Committee members and their legal advisors to ensure all constituents were well informed and advised in order to make necessary decisions for the benefit of all unsecured creditors

ALIXPARTNERS, LLP

SUMMARY OF MONTHLY FEE STATEMENTS
DURING THE FINAL PERIOD

Date Filed; Docket No.	Period	Requested		Paid		Amount Outstanding
		Fees	Expenses	Fees	Expenses	
11/05/2025 Docket #666	09/10/2025 - 09/30/2025	$ 983,352.00	$ 2,567.78	$ 786,681.60	$ 2,567.78	$ 196,670.40
12/03/2025 Docket #897	10/01/2025 - 10/31/2025	2,066,591.00	17,382.17	1,653,272.80	17,382.17	413,318.20
12/18/2025 Docket #1086	11/01/2025 - 11/30/2025	1,303,465.75	5,121.11	1,042,772.60	5,121.11	260,693.15
1/15/2026 Docket #1178	12/1/2025 - 12/29/2025	602,438.25	16,839.23	481,950.60	16,839.23	120,487.65
Subtotal		**$ 4,955,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 991,169.40**
Post-Effective Date Fees		25,000.00				25,000.00
Total		**$ 4,980,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 1,016,169.40**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DURING THE FINAL PERIOD

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	281.5	$ 410,990.00
Kevin Nystrom	Partner & Managing Director	$1,430	0.2	286.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	117.3	165,979.50
Marc Brown	Partner & Managing Director	$1,415	150.8	213,382.00
Greg Magrisi	Partner & Managing Director	$1,250	178.4	223,000.00
Christopher Rubel	Partner	$1,225	222.0	271,950.00
Jerry Wang	Partner	$1,225	18.4	22,540.00
Johnny Lee	Partner	$1,225	123.9	151,777.50
Elizabeth S Kardos	Partner	$950	12.0	11,400.00
Ashutosh Panda	Director	$1,150	463.6	533,140.00
Joel Amico	Director	$1,150	440.0	506,000.00
Iain Nelson	Director	$1,120	42.0	47,040.00
Matthew D Gates	Director	$1,120	192.1	215,152.00
Ryan Komendowski	Director	$1,080	416.1	449,388.00
Matthew Root	Director	$1,000	254.3	254,300.00
Matthew Wicker	Director	$1,000	1.5	1,500.00
Kaitlyn Sundt McClarren	Director	$715	8.1	5,791.50
Sam Lemack	Senior Vice President	$980	37.3	36,554.00
John Tutty	Senior Vice President	$950	143.5	136,325.00

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DURING THE FINAL PERIOD

Professional	Title	Rate	Hours	Fees
Thomas G Prince	Senior Vice President	$950	241.9	229,805.00
Christopher Cuomo	Senior Vice President	$910	150.3	136,773.00
Jyoji Morimoto	Senior Vice President	$910	89.5	81,445.00
Susan Clark	Senior Vice President	$910	318.4	289,744.00
Chase Hood	Senior Vice President	$850	408.1	346,885.00
Sari Hammer	Senior Vice President	$660	0.8	528.00
Brooke Filler	Senior Vice President	$605	5.6	3,388.00
Laurie Capen Verry	Senior Vice President	$600	0.5	300.00
Jennifer Braverman	Senior Vice President	$565	35.5	20,057.50
Claire Allshouse	Vice President	$810	14.6	11,826.00
Lucas Lovatto	Vice President	$835	221.7	185,119.50
Lisa Marie Bonito	Vice President	$580	62.3	36,134.00
Francisco Carafi	Vice President	$445	15.5	6,897.50
Hugh Olohan	Analyst	$535	3.6	1,926.00
Total Hours and Fees for Professionals			**4,671.3**	**$ 5,007,324.00**
Less: 50% Travel Fees				(51,477.00)
Total Fees for Professionals				**$ 4,955,847.00**

Average Billing Rate **$ 1,060.91**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
DURING THE FINAL PERIOD

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	101.3	$ 116,057.50
1.2	Meetings & Communication with UCC and Creditors	256.6	306,728.50
1.3	Prepare Committee Presentations	118.8	131,055.00
1.4	Meetings & Communication with Debtors	105.8	120,354.00
1.5	Mediation and Settlement Communications	42.6	47,590.50
1.6	DIP Financing and Cash Collateral	215.0	228,903.50
1.7	Liquidity and Cash Management	103.0	100,676.00
1.9	Business and Strategic Plan	1,304.9	1,335,818.50
1.10	Employee Compensation and Advisor Retention Matters	21.9	22,210.00
1.11	Financial and Other Diligence	406.9	430,674.00
1.12	Other Motions and Related Objections	59.8	67,875.00
1.13	Litigation Support & Investigations	398.4	469,325.50
1.14	Claims Analysis	152.4	147,204.50
1.15	Valuation and Solvency Analysis	829.4	902,168.50
1.17	RSA, Disclosure Statement & Plan of Reorganization	85.5	89,377.50
1.18	Court Hearings and Status Conferences	201.9	240,499.50
1.19	Retention Application & Relationship Disclosures	56.2	37,347.00
1.20	Fee Applications & Fee Statements	83.0	60,713.00
1.21	Discovery	2.3	2,626.00
1.22	Intercompany & Waterfall Analysis	44.1	47,166.00
1.31	Travel Time	81.5	51,477.00
	Total Hours and Fees By Matter Category	**4,671.3**	**$ 4,955,847.00**

Average Billing Rate $ 1,060.91

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
DURING THE FINAL PERIOD

Expense Category	Amount
Airfare	$ 6,470.03
Client Research	11,973.63
Ground Transportation	5,056.71
Lodging	16,229.90
Meals	2,180.02
Total Expenses	**$ 41,910.29**

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

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

FINAL FEE APPLICATION OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH DECEMBER 29, 2025

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors and reorganized debtors (collectively, the "Debtors" or the "Reorganized Debtors"), hereby submits its final application (the "Application") for allowance of compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from September 10, 2025 through December 29, 2025 (the "Final Period").

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Southern District of Texas, in the Houston Division (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Basis for Relief

3. The bases for relief requested herein are Sections 327, 330 and 331 of Title 11 of the United States Bankruptcy Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Local Rules"), the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the "U.S. Trustee Guidelines") and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 500] ("Interim Compensation Order").

Background

4. On August 20, 2025 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned Chapter 11 Cases (the "Chapter 11 Cases") in this Court.

5. No trustee or examiner has been appointed in these Chapter 11 Cases

6. On September 5, 2025, the Office of the United States Trustee for the District of Texas, Houston Division (the "U.S. Trustee") appointed the Official Committee of Unsecured Creditors (the "Committee") [Docket No. 124].

7. On December 5, 2025, the Debtors filed their *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (the "Plan").

8. On December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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"), pursuant to which the Court approved and confirmed the Plan.

9. On December 29, 2025, the Debtors filed the *Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* [Docket No. 1134] (the "Effective Date Notice"). The Plan went effective on December 29, 2025, (the "Effective Date").

10. Pursuant to the Plan, Confirmation Order, and Effective Date Notice, all professionals requesting compensation for services rendered and reimbursement of expenses in the Chapter 11 Cases prior to the Effective Date must file and serve a final fee application.

AlixPartners' Retention

11. On October 8, 2025, the Committee filed its *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* [Docket No. 473] (the "Retention Application").

12. On November 4, 2025, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* [Docket No. 654] (the "Retention Order").

13. The Retention Order approved the terms of AlixPartners' hourly fee and expense structure set forth in the engagement letter dated September 11, 2025 (the "Engagement Letter") and authorized AlixPartners to be compensated and reimbursed pursuant to section 330 of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, Bankruptcy Rules, Local Rules, U.S. Trustee Guidelines and the Interim Compensation Order, and any other applicable orders of this Court.

14. Pursuant to the Engagement Letter, David MacGreevey is the Partner & Managing Director responsible for this engagement, assisted by a staff of consultants at various levels with a wide range of relevant skills and abilities.

Monthly Fee Statements During the Final Period

15. AlixPartners served four (4) monthly fee statements (the "Monthly Fee Statements") during the Final Period. The Monthly Fee Statements contain detailed descriptions

of the services rendered in the amount of $4,955,847.00[2] and out-of-pocket expenses incurred in the amount of $41,910.29 and are attached hereto:

> **Exhibit A** is the *First Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through September 30, 2025* [Docket No. 666]
>
> **Exhibit B** is the *Second Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from October 1, 2025 through October 31, 2025* [Docket No. 897]
>
> **Exhibit C** is the *Third Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2025 through November 30, 2025* [Docket No. 1086]
>
> **Exhibit D** is the *Fourth Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from December 10, 2025 through December 29, 2025* [Docket No. 1178]

16. Detailed descriptions of the services rendered by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour), and a detailed list of out-of-pocket expenses incurred during the Final Period were included in the Monthly Fee Statements, which have been served and noted below:

[2] This amount includes the 20% holdback of fees reflected in the Monthly Fee Statements, including $196,670.40 for the First Monthly Fee Statement, $413,318.20 for the Second Monthly Fee Statement, $260,693.15 for the Third Monthly Fee Statement, and $120,487.65 for the Fourth Monthly Fee Statement, for a total holdback of $991,169.40 (the "Holdback").

Date Filed; Docket No.	Period	Requested		Paid		Amount Outstanding
		Fees	Expenses	Fees	Expenses	
11/05/2025 Docket #666	09/10/2025 - 09/30/2025	$ 983,352.00	$ 2,567.78	$ 786,681.60	$ 2,567.78	$ 196,670.40
12/03/2025 Docket #897	10/01/2025 - 10/31/2025	2,066,591.00	17,382.17	1,653,272.80	17,382.17	413,318.20
12/18/2025 Docket #1086	11/01/2025 - 11/30/2025	1,303,465.75	5,121.11	1,042,772.60	5,121.11	260,693.15
1/15/2026 Docket #1178	12/1/2025 - 12/29/2025	602,438.25	16,839.23	481,950.60	16,839.23	120,487.65
Subtotal		**$ 4,955,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 991,169.40**
Post-Effective Date Fees		25,000.00				25,000.00
Total		**$ 4,980,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 1,016,169.40**

17. This final Application does not include additional fees incurred after December 29, 2025 with regards to the preparation and prosecution of this final Application. AlixPartners hereby requests an additional $25,000.00 for fees incurred and expected to be incurred after the Effective Date in connection with the preparation and prosecution of this final Application (the "Post-Effective Date Fees"). For the avoidance of doubt, AlixPartners will invoice the lesser of either actual, reasonable and necessary fees or $25,000.00 for the Post-Effective Date Fees.

18. AlixPartners received payments from the Debtors in the amount of $3,964,677.60 for services rendered and $41,910.29 for out-of-pocket expenses incurred during the Final Period. The total amount of $1,016,169.40 remains outstanding as of the filing of this Application.

Summary of Services Rendered During the Final Period

19. During the Final Period, AlixPartners advised the Committee and supported White & Case in analyzing numerous issues critical to unsecured creditors' interests. Due to the Committee's efforts with assistance from AlixPartners, the unsecured creditors were able to obtain a more favorable recovery than the Debtors initial filed Plan. After numerous meetings and diligence sessions with the Debtors' advisors and various Committee filings with the Court, the Debtors ultimately filed an amended Plan that increased recoveries for general unsecured creditors by allowing them to share in the reorganized equity and participate in the warrants package or select a cash out option.

20. AlixPartners also developed an independent view of the Debtors' business plan and valuation. This included numerous due diligence sessions with management and Debtor advisors, review of various Debtor produced business plan documents, development of supporting analyses and review of data room documents. Ultimately AlixPartners produced expert reports related to its analysis of the Debtors' business plan and valuation and provided related testimony at the confirmation hearing. The expert business plan report provided an objective third party view of the Debtors' proposed business plan and identified key initiatives that would result in EBITDA enhancements. During the DIP hearing, AlixPartners presented analysis and testimony that ultimately served as the basis for changes in the DIP financing order beneficial to unsecured creditors. In sum, AlixPartners played a critical role to represent unsecured creditors interests, increased recoveries under the Plan and provided a check on the Debtors' actions throughout the case.

Summary of Services by Category During the Final Period

21. AlixPartners classified the services performed into separate categories. The descriptions below summarize the services provided by AlixPartners to the Committee during the Final Period.

Matter Code 1.1: Planning, Coordination and Case Management
101.3 hours – $116,057.50

- Organized and managed resources to effectively plan and coordinate the Chapter 11 process
- Held working sessions to keep the engagement team informed of case developments, remain aligned on the many workstreams, verify that resources were properly allocated to meet deadlines, and ensure all matters and issues are being addressed in an efficient and timely manner

Matter Code 1.2: Meetings & Communication with UCC and Creditors
256.6 hours – $306,727.50

- Updated the Committee regarding the status of the Chapter 11 Cases and presented analyses for various case workstreams

- Attended discussions and communicated with other professionals representing the Committee
- Calls and communication with W&C and/or Committee members

Matter Code 1.3: Preparation of Committee Presentations
118.8 hours - $131,055.00

- Prepared, revised and circulated presentations to the Committee containing case updates and various case workstream analyses

Matter Code 1.4: Meetings & Communication with Debtors
105.8 hours - $120,354.00

- Meetings, interviews and communication with Company management, Latham & Watkins, FTI Consulting and Moelis & Company

Matter Code 1.5: Mediation and Settlement Communications
42.6 hours - $47,590.50

- Attended meetings, communicated and coordinated with various parties related to settlement discussions
- Performed analysis related to settlement discussions

Matter Code 1.6: DIP Financing and Cash Collateral
215.0 hours - $228,903.50

- Analyzed and reviewed the DIP Credit Agreement and other related documents
- Reviewed the Debtors' DIP Budget
- Assisted W&C in evaluating the DIP motion
- Analyzed the key terms and conditions of the Debtors' proposed DIP financing as compared to DIP financing proposed by similarly situated companies
- Prepared a declaration and supporting exhibits in support of the Committee's objection to the proposed DIP financing

Matter Code 1.7: Liquidity and Cash Management
103.0 hours - $100,676.00

- Analyzed cash flow budgets published during these Chapter 11 Cases
- Developed projections of cash available as of the Effective Date
- Performed various analyses to project liquidity under various scenarios

Matter Code 1.9: Business and Strategic Plan Analysis
1,304.9 hours - $1,335,818.50

- Analyzed and performed due diligence regarding the Debtors' business plan and its reasonableness with respect to emergence from the Chapter 11 Cases
- Detailed review of various business plan models, supporting schedules and assumptions
- Preparation of expert report to assess the reasonability of the Debtors' business plan, which identified numerous opportunities for the Debtors to improve

efficiency in their business and generate incremental revenue

Matter Code 1.10: Employee Compensation and Advisor Retention Matters
21.9 hours - $22,210.00

- Reviewed and analyzed engagement letters and professional fee forecasts for each professional retained by the Debtors, Lenders and Committee
- Reviewed and analyzed retention applications of the Debtors' financial advisor and investment banker as compared to motions in similar cases
- Analyzed key terms and conditions of the Debtors' financial advisor and investment banker as compared to financial advisor and investment banker retentions by similarly situated companies to advise the Committee as to the reasonableness of the proposed retentions

Matter Code 1.11: Financial and Other Diligence
406.9 hours - $430,674.00

- Performed various financial analyses including work related to projected liquidity, financial projections, data room diligence, and other tasks not included in other matter codes
- Prepared detailed analysis and summary of Debtors' schedules of assets and liabilities and statements of financial affairs ("Schedules and Statements")
- Performed financial analysis to support various requests from W&C
- Researched and documented relevant information regarding the Debtors' and other relevant parties' financial affairs from public and non-public sources, including, but not limited to, SEC filings, monthly operating reports, Schedules and Statements and data provided by the Debtors' advisors

Matter Code 1.12: Other Motions and Related Objections
59.8 hours - $67,875.00

- Reviewed the Court docket and case calendars
- Analyzed and reviewed pleadings filed on the Court docket
- Analysis of "first day" and other motions and related objections not encompassed by other matter codes, such as the UHC settlement motion and certain ordinary course professional motions

Matter Code 1.13: Litigation Support & Investigations
398.4 hours - $469,325.50

- Conducted detailed investigations into the Debtors' insiders' and other parties' actions prior to filing for bankruptcy
- Reviewed the Debtors' advisors' reports on these actions, prepared related expert reports, and summarized findings for the Committee
- Assisted W&C with diligence and financial analysis related to various motions and objections including challenges on liens, section 552 and historical transactions
- Prepared for numerous interviews and depositions

Matter Code 1.14: Claim Analysis
152.4 hours - $147,204.50

- Reviewed and analyzed scheduled and filed claims
- Derived illustrative waterfalls to assess potential general unsecured claimant recoveries

Matter Code 1.15: Valuation and Solvency Analysis
829.4 hours - $902,168.50

- Assessed likely ranges of value of the Debtors' assets or business units under reorganization, sale and/or liquidation scenarios, both historically and currently
- Analysis of the Debtors' valuation report
- Review of the Debtors' historical and projected financials, analysis of comparable companies and analysis of comparable transactions
- Preparation of an expert valuation report
- Analysis of valuation and solvency under different scenarios and assumptions

Matter Code 1.17: RSA, Disclosure Statement & Plan
85.5 hours - $89,377.50

- Negotiated, analyzed, reviewed and provided commentary on the Debtors' Plan, Disclosure Statement, Plan supplement, and other related documents

Matter Code 1.18: Court Hearings and Status Conferences
201.9 hours - $240,499.50

- Attended court hearings and status conferences
- Provided testimony at court hearings

Matter Code 1.19: Retention Application & Relationship Disclosures
56.2 hours - $37,347.00

- Drafted AlixPartners' retention application, proposed orders and declarations
- Analyzed relationship disclosures required by the Bankruptcy Code
- Communicated with various parties regarding AlixPartners' retention
- Responded to inquiries related to AlixPartners' retention

Matter Code 1.20: Fee Statements & Fee Applications
83.0 hours - $60,713.00

- Managed the fee application process
- Prepared and reviewed the Monthly Fee Statements, including all required supporting documentation in accordance with requirements of the U.S. Trustee and/or the Court

Matter Code 1.21: Discovery
2.3 hours - $2,626.00

- Collected, processed, and organized data
- Reviewed collected data and documents

Matter Code 1.22: Intercompany & Waterfall Analysis
44.1 hours - $47,166.00

- Analyzed and reviewed prepetition and post-petition intercompany transactions
- Prepared waterfall analysis to evaluate creditor recoveries under various scenarios

Matter Code 1.31: Travel Time
81.5 hours - $51,477.00 (billed at 50% standard rates)

- Traveled to meetings and Court hearings outside of consultants' respective "home" office region

22. AlixPartners has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

AlixPartners' Requested Compensation and Reimbursement of Expenses Should be Allowed

23. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under Section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

> In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, extent, and the value of such services, taking into account all relevant factors, including-
>
> (A) the time spent on such services;
> (B) the rates charged for such services;
> (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
> (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue or task addressed; and

> (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
>
> (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than under this title.

11 U.S.C. § 330(a)(3).

24. AlixPartners believes that the fees and out-of-pocket expenses requested are reasonable, actual and for necessary services rendered or expenses incurred on behalf of the Committee during the Final Period.

Notice

25. Notice of the Application has been or will be provided to those parties entitled to receive notice hereof in accordance with any applicable order of this Court.

[Remainder of page intentionally left blank.]

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests that the Court enter an order providing: (i) a final allowance in the amount of $4,955,847.00 (including the Holdback in the amount of $991,169.40) as compensation for professional services rendered and $41,910.29 for reimbursement of out-of-pocket expenses for the Final Period and Post-Effective Date Fees in the amount of $25,000.00, for a total amount of $5,022,757.29; (ii) that the Debtors are authorized and directed to pay AlixPartners the remaining outstanding balance of $1,016,169.40; and (iii) such other and further relief as this Court deems proper.

Dated: February 11, 2026

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

First Monthly Fee Statement
September 10, 2025 through September 30, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: November 19, 2025 @ 4:00 p.m.(CT)

FIRST MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	9/10/2025	9/30/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$786,681.60 (80% of $983,352.00)	
Total expenses requested in this Fee Statement:	$2,567.78	
Total fees and expenses requested in this Fee Statement:	$789,249.38	
Blended hourly rate for professionals:	$1,042..02	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

2590309251105000000000016

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	95.1	$ 138,846.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	36.9	52,213.50
Marc Brown	Partner & Managing Director	$1,415	3.3	4,669.50
Greg Magrisi	Partner & Managing Director	$1,250	8.4	10,500.00
Jerry Wang	Partner	$1,225	4.2	5,145.00
Johnny Lee	Partner	$1,225	15.2	18,620.00
Ashutosh Panda	Director	$1,150	55.5	63,825.00
Joel Amico	Director	$1,150	93.3	107,295.00
Matthew D Gates	Director	$1,120	88.8	99,456.00
Ryan Komendowski	Director	$1,080	46.2	49,896.00
Matthew Root	Director	$1,000	35.7	35,700.00
Kaitlyn Sundt McClarren	Director	$715	2.2	1,573.00
Thomas G Prince	Senior Vice President	$950	123.2	117,040.00
Christopher Cuomo	Senior Vice President	$910	75.0	68,250.00
Jyoji Morimoto	Senior Vice President	$910	44.2	40,222.00
Susan Clark	Senior Vice President	$910	21.6	19,656.00
Chase Hood	Senior Vice President	$850	150.5	127,925.00
Sari Hammer	Senior Vice President	$660	0.8	528.00
Brooke Filler	Senior Vice President	$605	3.2	1,936.00
Jennifer Braverman	Senior Vice President	$565	26.0	14,690.00
Lucas Lovatto	Vice President	$835	13.8	11,523.00
Lisa Marie Bonito	Vice President	$580	0.6	348.00
Total Hours and Fees for Professionals			**943.7**	**$ 989,857.00**
Less: 50% Travel Fees				(6,505.00)
Total Fees for Professionals				**$ 983,352.00**
Less: 20% Holdback				(196,670.40)
Total Fees for Professionals Less Holdback				**$ 786,681.60**

Average Billing Rate **$ 1,042.02**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	31.1	$ 35,620.00
1.2	Meetings & Communication with UCC and Creditors	72.7	87,895.50
1.3	Preparation of Committee Presentations	39.4	42,117.00
1.4	Meetings & Communication with Debtors	23.8	28,758.00
1.6	DIP Financing and Cash Collateral	213.7	227,403.00
1.7	Liquidity and Cash Management	52.0	51,159.00
1.9	Business and Strategic Plan	115.6	120,670.50
1.10	Employee Compensation and Advisor Retention Matters	16.1	15,584.00
1.11	Financial and Other Diligence	140.0	144,921.00
1.12	Other Motions and Related Objections	30.0	32,302.00
1.14	Claims Analysis	0.9	765.00
1.15	Valuation and Solvency Analysis	118.6	118,838.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	12.5	13,175.50
1.18	Court Hearings and Status Conferences	30.4	34,241.50
1.19	Retention Application & Relationship Disclosures	33.6	20,771.00
1.21	Discovery	2.3	2,626.00
1.31	Travel Time	11.0	6,505.00
	Total Hours and Fees By Matter Category Before Holdback	**943.7**	**$ 983,352.00**

Average Billing Rate $ 1,042.02

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Expense Category	Amount
Airfare	$ 340.49
Ground Transportation	529.53
Lodging	1,432.37
Meals	265.39
Total Expenses	**$ 2,567.78**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this first monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from September 10, 2025 through September 30, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $983,352.00 and reimbursement of out-of-pocket expenses in the amount of $2,567.78 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $786,681.60 (80% of $983,352.00) and 100% of out-of-pocket expenses in the amount of $2,567.78 for a total amount of $789,249.38; and (iii) such other and further relief as this Court deems proper.

Dated: November 5, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Correspondence with team re: work plan	0.4
09/10/2025	CH	Prepare working group list for counsel	0.8
09/10/2025	CH	Prepare team internal datasite and email distribution group	0.9
09/10/2025	DM	Communicate with D. Orlofsky (AlixPartners) re: ModivCare UCC work plan and staffing	0.5
09/10/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2
09/10/2025	DM	Develop ModivCare UCC work plan, strategy and related staffing	1.5
09/10/2025	DM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	GM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	KBM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	KBM	Prepare case set-up items	0.9
09/10/2025	KBM	Email to internal team re: case workstreams and next steps	0.6
09/10/2025	MB	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2
09/11/2025	AP	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	CH	Prepare internal datasite and email distribution group	0.8
09/11/2025	CH	Draft updates to working group list	0.7
09/11/2025	CC	Complete input to work plan and diligence request lists	1.4
09/11/2025	CC	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	DM	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	DM	Discussion with D. MacGreevey, M. Brown (AlixPartners) re: ModivCare investigation work plan	0.2
09/11/2025	DM	Review and comments to draft ModivCare working group list	0.5
09/11/2025	GM	Prepare for call for ModivCare re: diligence	0.3
09/11/2025	GM	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	JL	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	JL	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	KBM	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	MB	Discussion with D. MacGreevey, M. Brown (AlixPartners) re: ModivCare investigation work plan	0.2
09/11/2025	MDG	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/12/2025	LMB	Prepare Fee Application Procedures Memorandum	0.6
09/17/2025	JL	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/18/2025	CH	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	CC	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	DM	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	DM	Communication with K. McGlynn, J. Amico, J. Lee re: ModivCare work plan	0.4
09/18/2025	JA	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	JL	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	MDG	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	RK	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	TGP	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/21/2025	DM	Communicate with D. Orlofsky (AlixPartners) re: ModivCare staffing	0.5
09/24/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	LL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	SC	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
Total Professional Hours			**31.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.2	$	9,052.00
Kathryn B McGlynn	$1,415	3.1		4,386.50
Marc Brown	$1,415	0.7		990.50
Greg Magrisi	$1,250	1.2		1,500.00
Johnny Lee	$1,225	2.6		3,185.00
Ashutosh Panda	$1,150	1.1		1,265.00
Joel Amico	$1,150	1.4		1,610.00
Matthew D Gates	$1,120	1.8		2,016.00
Ryan Komendowski	$1,080	1.6		1,728.00
Thomas G Prince	$950	1.4		1,330.00
Christopher Cuomo	$910	3.2		2,912.00
Susan Clark	$910	0.6		546.00
Chase Hood	$850	5.0		4,250.00
Lucas Lovatto	$835	0.6		501.00
Lisa Marie Bonito	$580	0.6		348.00
Total Professional Hours and Fees		**31.1**	**$**	**35,620.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	DM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	GM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	JA	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	KBM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	RK	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/11/2025	AP	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	DM	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	JA	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	KBM	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	MB	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	MDG	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/12/2025	DM	Emails with attachment with S. Greissman, A. Zatz, E. Smith (W&C) re: additions and clarifications to ModivCare diligence tracker	0.4
09/12/2025	DM	Prepare memorandum with attachments to W&C re: updates on ModivCare work plan	0.7
09/12/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare UCC diligence and strategy	0.2
09/13/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare diligence	0.2
09/13/2025	DM	Emails with S. Greissman, A. Zatz and E. Smith (W&C) re: additions and clarifications to ModivCare diligence tracker	0.4
09/16/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	DM	Communication with A. Zatz (W&C) re: ModivCare trade vendor order	0.2
09/16/2025	DM	Discussion with S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor motion	0.4
09/16/2025	GM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JW	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JA	Discussion with S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor motion	0.4
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	JL	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	JL	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	MDG	Call with A. Zatz (W&C) re: cash management motion	0.2
09/16/2025	MDG	Call with A. Zatz (W&C) re: vendor motion	0.2
09/16/2025	MDG	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	RK	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	RK	Review documents produced for valuation analysis.	1.6
09/16/2025	TGP	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	TGP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/17/2025	DM	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	DM	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	DM	Emails with S. Greissman (W&C) and J. Amico (AlixPartners) re: ModivCare diligence	0.2
09/17/2025	JA	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	JA	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	JL	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	KBM	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9

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Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	MDG	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	TGP	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/18/2025	DM	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	DM	Prepare oral presentation for ModivCare UCC meeting	0.7
09/18/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JA	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JL	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	KBM	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	MDG	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/19/2025	CH	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	DM	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	MDG	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	MDG	Email to E. Smith (W&C) re: due diligence	0.2
09/20/2025	CH	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	CC	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	DM	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	DM	Prepare for meeting with W&C re: ModivCare DIP declaration	0.7
09/21/2025	CH	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	CC	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	DM	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	JA	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/22/2025	CH	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare valuation	0.2
09/22/2025	DM	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	DM	Prepare remarks for upcoming meeting with ModivCare UCC re: DIP objection	0.5
09/22/2025	JA	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	TGP	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/23/2025	CC	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/23/2025	DM	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/23/2025	JA	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/24/2025	KBM	Review case updates from Committee Counsel and next steps	0.6
09/25/2025	AP	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	CC	Participate in a call with J. Amico and C. Cuomo (AlixPartners) and A. Chase and others (W&C) re: document collection	0.3
09/25/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	GM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	JA	Participate in a call with J. Amico and C. Cuomo (AlixPartners) and A. Chase and others (W&C) re: document collection	0.3
09/25/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	MDG	Call with R. Beil (W&C) re: intercompany transfers	0.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	RK	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/29/2025	DM	Communication with J. Zakia (W&C) re: ModivCare transportation network	0.3
09/29/2025	MDG	Call with A. Zatz (W&C) re: financial projections	0.2
09/29/2025	MDG	Prepare summary of critical vendor motion and send to W&C	1.0
09/30/2025	CH	Correspondence with J. Zakia and others (W&C) re: 2nd day hearing preparation	0.7
09/30/2025	DM	Attend meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, and L. Miranda (W&C) re: DIP hearing post mortem and go forward plan	2.0
09/30/2025	JA	Participate in call with J. Amico and M. Gates (AlixPartners) and E. Smith (W&C) re: disclosure statement objection	0.3
09/30/2025	MDG	Participate in call with J. Amico and M. Gates (AlixPartners) and E. Smith (W&C) re: disclosure statement objection	0.3
Total Professional Hours			**72.7**

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	17.3	$	25,258.00
Kathryn B McGlynn	$1,415	8.1		11,461.50
Marc Brown	$1,415	0.6		849.00
Greg Magrisi	$1,250	3.2		4,000.00
Jerry Wang	$1,225	0.8		980.00
Johnny Lee	$1,225	3.8		4,655.00
Ashutosh Panda	$1,150	2.1		2,415.00
Joel Amico	$1,150	9.8		11,270.00
Matthew D Gates	$1,120	8.3		9,296.00
Ryan Komendowski	$1,080	4.8		5,184.00
Thomas G Prince	$950	4.9		4,655.00
Christopher Cuomo	$910	3.7		3,367.00
Chase Hood	$850	5.3		4,505.00
Total Professional Hours and Fees		**72.7**	**$**	**87,895.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Draft demonstrative for counsel for Committee presentation	0.6
09/11/2025	DM	Revise draft issues lists for ModivCare cash management, critical vendor and DIP motions	0.7
09/15/2025	CC	Begin to prepare presentation on first day motions	0.7
09/15/2025	JA	Draft of supporting slides and provide comments on first day motion summary materials	0.9
09/16/2025	CC	Finalize presentation on first day motions	0.9
09/16/2025	MDG	Review and revise presentation to Committee on first and second day motions	2.5
09/16/2025	TGP	Create slides summarizing analysis of the Debtors' first day motions	2.2
09/16/2025	TGP	Update slides summarizing analysis of the Debtors' first day motions based on internal comments	1.1
09/17/2025	CH	Draft variance and liquidity demonstrative for weekly Committee materials	1.3
09/17/2025	CC	Finalize presentation on first day motions re: critical vendor slide	1.1
09/17/2025	DM	Review, revise and comments on draft presentation for ModivCare UCC	1.2
09/17/2025	DM	Review, revise and comments on several iterations of a revised draft presentation to ModivCare re: updates	1.7
09/17/2025	JA	Draft of Committee deck re: first day motion and other updates	1.2
09/17/2025	KBM	Review and revise weekly Committee update presentation	0.9
09/17/2025	MDG	Review changes to Committee presentation re: first day motions	2.0
09/17/2025	TGP	Create slides summarizing the Debtors' actual performance to budget	0.8
09/17/2025	TGP	Update presentation slides for call with the Committee based on internal comments	0.4
09/17/2025	TGP	Update slides summarizing analysis of the Debtors' first day motions based on internal comments	0.7
09/18/2025	DM	Review and revise draft presentation to ModivCare UCC per W&C comments	0.6
09/18/2025	DM	Review ModivCare revised motion to pay trade vendors and amend UCC update deck	0.4
09/18/2025	DM	Revise draft presentation to ModivCare UCC re: weekly updates	0.5
09/18/2025	TGP	Update presentation materials for call with Committee based on comments from counsel	0.2
09/22/2025	CC	Update presentation on SOFA/SOALs re: assets	0.9
09/22/2025	CC	Update presentation on SOFA/SOALs re: claims	2.5
09/23/2025	CC	Finalize updates to presentation on SOFA/SOALs re: assets, claims, and payments	2.4
09/23/2025	CC	Update presentation on SOFA/SOALs after feedback from M. Gates of AlixPartners	2.2
09/23/2025	MDG	Review SOFA/SOAL presentation	1.8
09/24/2025	JA	Review and provide comments to Committee presentation materials	1.0
09/24/2025	KBM	Review and revise weekly Committee update presentation	0.9
09/24/2025	TGP	Update weekly slides for Committee call based on internal comments	0.7
09/25/2025	CC	Finalize updates to presentation on SOFA/SOALs re: employees	0.7
09/25/2025	TGP	Update slides summarizing analysis of SOFAs / SOALs based on responses from FTI	0.4
09/29/2025	MDG	Update SOFA/SOAL presentation for comments from K. McGlynn	0.8
09/30/2025	MDG	Finalize SOFA / SOAL presentation and send to W&C	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	TGP	Create slides summarizing analysis of FTI's proposed fee structure	0.9
09/30/2025	TGP	Create slides summarizing analysis of Moelis' proposed fee structure	1.2
Total Professional Hours			**39.4**

AlixPartners

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Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.1	$	7,446.00
Kathryn B McGlynn	$1,415	1.8		2,547.00
Joel Amico	$1,150	3.1		3,565.00
Matthew D Gates	$1,120	7.5		8,400.00
Thomas G Prince	$950	8.6		8,170.00
Christopher Cuomo	$910	11.4		10,374.00
Chase Hood	$850	1.9		1,615.00
Total Professional Hours and Fees		**39.4**	**$**	**42,117.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/11/2025	DM	Attend meeting with C. Shandler (FTI), A. Steinberg (Moelis) re: ModivCare FA kick off	0.5
09/11/2025	DM	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	DM	Prepare for meeting with C. Shandler (FTI), A. Steinberg (Moelis) re: ModivCare financial advisor kickoff	0.5
09/11/2025	JA	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	KBM	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/12/2025	DM	Email C. Shandler (FTI) and A. Steinberg (Moelis) re: ModivCare diligence	0.3
09/13/2025	DM	Email C. Shandler (FTI) and A. Steinberg (Moelis) re: ModivCare diligence	0.3
09/15/2025	CH	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	CC	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	DM	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	JA	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	JA	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	KBM	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4
09/16/2025	MDG	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	DM	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	JA	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	JL	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	TGP	Email communications with FTI re: the Debtors' variance report for the period ended September 7	0.2
09/19/2025	DM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	GM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	0.2
09/19/2025	JA	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	JL	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	KBM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	RK	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	TGP	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/24/2025	MDG	Review FTI responses to questions re: SOFA and SOAL	0.5
09/25/2025	MDG	Call with J. Shapiro and D. Kiyosaki (FTI) re: intercompany transfers	0.2
09/29/2025	MDG	Correspondence with FTI re: due diligence list and call	0.5
09/30/2025	AP	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	GM	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	JW	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	JA	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	JL	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	KBM	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	MDG	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	RK	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	TGP	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
Total Professional Hours			**23.8**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.9	$	7,154.00
Kathryn B McGlynn	$1,415	3.1		4,386.50
Greg Magrisi	$1,250	0.7		875.00
Jerry Wang	$1,225	0.5		612.50
Johnny Lee	$1,225	2.0		2,450.00
Ashutosh Panda	$1,150	0.5		575.00
Joel Amico	$1,150	4.2		4,830.00
Matthew D Gates	$1,120	2.1		2,352.00
Ryan Komendowski	$1,080	1.5		1,620.00
Thomas G Prince	$950	1.7		1,615.00
Christopher Cuomo	$910	1.3		1,183.00
Chase Hood	$850	1.3		1,105.00
Total Professional Hours and Fees		**23.8**	**$**	**28,758.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Draft potential DIP issues	0.8
09/10/2025	CH	Review DIP motion and DIP term sheet	1.7
09/10/2025	CH	Review discovery requests in connection with DIP and RSA	0.7
09/11/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/11/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/11/2025	JA	Analyze DIP budget and prepare diligence questions	1.1
09/11/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/12/2025	CH	Review initial approved DIP budget	1.1
09/12/2025	CH	Screen for potential comparable DIP facilities	1.8
09/12/2025	TGP	Analyze the Debtors' DIP motion	2.2
09/15/2025	CH	Analyze DIP financing terms for selected comparable facilities	2.8
09/15/2025	CH	Continue to analyze DIP financing terms for selected comparable facilities	2.6
09/15/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	CH	Research DIP motions and final orders for comparable DIP facilities	1.9
09/15/2025	CH	Research restructuring support agreements and disclosure statements for related comparable DIP facility cases	1.2
09/15/2025	CC	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	CC	Review 10-K and DIP budget in advance of DIP budget call	0.4
09/15/2025	CC	Review DIP comparables for inclusion in analysis on costs	0.3
09/15/2025	CC	Summarize notes from intro call for D. MacGreevey and J. Amico of AlixPartners	0.4
09/15/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	JA	Review and analysis of underlying DIP model and assumptions	1.2
09/15/2025	JA	Review DIP comps and supporting analysis	1.0
09/16/2025	CH	Analyze dilution and equity splits in relation to equitized backstop fees for comparable DIP facilities	2.3
09/16/2025	CH	Analyze disclosure statements for comparable DIP facilities re: plan equity value	1.9
09/16/2025	CH	Analyze restructuring support agreements for comparable DIP facilities re: DIP backstop fee economics	2.4
09/16/2025	CH	Review draft DIP model re: receipt buildup and transportation disbursements	0.7
09/16/2025	JA	Review DIP issues and collateral issues	1.4
09/16/2025	KBM	Review DIP budget and related items	0.7
09/17/2025	CH	Draft updates to DIP comps analysis	2.1
09/17/2025	CH	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	CH	Research re: expanded comp set for DIP facilities	1.8
09/17/2025	CH	Research re: unencumbered asset values	0.6

AlixPartners

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Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	CC	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	CC	Review DIP comparable transactions related to fees with a specific emphasis on backstop fees	3.0
09/17/2025	JA	Analyze potential unencumbered assets	0.8
09/17/2025	JA	Draft of issues list and supporting analysis of DIP objection	0.7
09/17/2025	JA	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	JL	Review receivables and information in DIP/Cash collateral motions	0.7
09/18/2025	CH	Analyze extended DIP budget forecast	1.2
09/18/2025	CH	Analyze Moelis DIP comp set and compare to AlixPartners comp set	1.1
09/18/2025	CH	Draft analysis re: proposed DIP financing internal rate of return	1.7
09/18/2025	CH	Internal call with M. Gates and C. Hood (AlixPartners) re: DIP comps analysis	0.5
09/18/2025	JL	Prepare for DIP financing and cash collateral motion/objection/affidavit	0.7
09/18/2025	MDG	Internal call with M. Gates and C. Hood (AlixPartners) re: DIP comps analysis	0.5
09/18/2025	MDG	Review DIP comp data	2.2
09/19/2025	CH	Analyze extended DIP budget scenario analysis	0.5
09/19/2025	CH	Call with M. Gates and C. Hood (AlixPartners) re: DIP IRR calculation and DIP comps analysis	0.3
09/19/2025	CH	Draft updated DIP comps analysis as requested by counsel	1.5
09/19/2025	CH	Draft updates to DIP comps analysis and demonstratives to reflect comments from W&C	2.1
09/19/2025	CH	Draft updates to DIP comps analysis to incorporate comments from M. Gates (AlixPartners)	1.2
09/19/2025	CH	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	CH	Research additional comparable DIP facilities in Southern District of Texas	0.6
09/19/2025	CH	Review document production related to DIP budget and prepetition liquidity reporting	1.4
09/19/2025	CH	Review restructuring proposals and board materials re: proposed backstop fee and estimated equity value	1.3
09/19/2025	CC	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	DM	Draft MacGreevey declaration in support of ModivCare DIP objection	1.0
09/19/2025	DM	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	JA	Review DIP comps and prepare issue list	0.8
09/19/2025	MDG	Call with M. Gates and C. Hood (AlixPartners) re: DIP IRR calculation and DIP comps analysis	0.3
09/19/2025	MDG	Draft bullets for W&C re: DIP comparable research	0.5
09/19/2025	MDG	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	MDG	Research two precedent DIP backstop fees	1.5
09/19/2025	MDG	Review DIP comparables schedule	2.0
09/20/2025	CH	Correspondence with team re: extended DIP forecast assumptions	0.5

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/20/2025	CH	Research re: plan equity value for ModivCare and related DIP comps	0.8
09/20/2025	CH	Review draft DIP objection	0.7
09/20/2025	CH	Review extended case timeline analysis and related assumptions	0.6
09/20/2025	CC	Review DIP budget and budget extension analysis	1.7
09/20/2025	CC	Review liquidity and DIP comparables analysis in advance of meeting with W&C	0.7
09/20/2025	DM	Analyze extended ModivCare DIP budget	0.6
09/20/2025	DM	Analyze ModivCare DIP comp set	1.0
09/20/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.7
09/20/2025	JA	Analysis and development of extended DIP budget	1.5
09/20/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.7
09/20/2025	JA	Review filings and underlying DIP budget	1.0
09/20/2025	MDG	Research comparable DIP backstop fees	0.8
09/21/2025	CH	Analyze extended budget forecast and related assumptions	0.7
09/21/2025	CH	Research re: additional potential DIP comps	1.3
09/21/2025	CC	Continue to evaluate cash flow and working capital for DIP objection	1.6
09/21/2025	CC	Review investment banking fees and associated analysis	1.4
09/21/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.5
09/21/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare case extension analysis	0.5
09/21/2025	DM	Exact research	0.3
09/21/2025	DM	Review and comments on draft objection to ModivCare DIP motion	1.0
09/21/2025	DM	Review and comments on email from J. Amico re: ModivCare DIP objection	0.3
09/21/2025	DM	Review draft extension of ModivCare DIP budget	0.8
09/21/2025	DM	Review email from S. Spitzer re: details of Exela DIP	0.2
09/21/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare case extension analysis	0.5
09/21/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.5
09/21/2025	JA	Draft of revised cash analysis to extend timeline	1.5
09/21/2025	KBM	Review DIP motion to identify potential objectionable issues	1.1
09/21/2025	KBM	Review DIP objection for potential revisions	0.9
09/21/2025	MDG	Research comparable DIP backstop fees	1.0
09/21/2025	MDG	Review draft DIP objection	0.8
09/22/2025	CH	Analyze forecasted DIP interest and DIP sizing	0.6
09/22/2025	CH	Draft analysis re: extended cash flow forecast and related assumptions	1.1
09/22/2025	CH	Review and draft updates to DIP terms comps analysis	2.1
09/22/2025	CH	Review initial draft DIP declaration and provide comments	0.5
09/22/2025	CH	Review revised DIP objection and DIP declarations	0.8
09/22/2025	CH	Review year to date actuals re: weekly and monthly operating cash flow	0.8
09/22/2025	DM	Communication with C. Hood (AlixPartners) re: ModivCare DIP comps	0.2
09/22/2025	DM	Communication with C. Hood, M. Gates and R. Komendowski (AlixPartners) re: ModivCare DIP analysis	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee	0.3
09/22/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee valuation	0.2
09/22/2025	DM	Revise draft MacGreevey declaration in support of ModivCare DIP objection	0.8
09/22/2025	JA	Analyze requests from W&C re: DIP collateral	0.5
09/22/2025	JA	Analyze seasonality and other cash flow items to develop go forward view	0.5
09/22/2025	JA	Develop go forward cash projection based on analyzing existing cash flow forecast	1.4
09/22/2025	JA	Review and provide comments on DIP objection	0.5
09/22/2025	KBM	Review D. MacGreevey declaration re: DIP objection and revisions	0.9
09/22/2025	KBM	Review sets of revisions to DIP objection	1.1
09/22/2025	MDG	Complete detailed review of DIP comparables	2.5
09/22/2025	MDG	Review and comment on DIP declaration	0.5
09/22/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee	0.3
09/22/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee valuation	0.2
09/23/2025	CH	Analyze illustrative plan valuation and related backstop fee equity value	0.8
09/23/2025	CH	Correspondence with A. Zatz and others (W&C), D. MacGreevey, J. Amico, and M. Gates (AlixPartners) re: DIP objection and DIP comps	1.2
09/23/2025	CH	Draft updates to DIP comps analysis to reflect comments from D. MacGreevey (AlixPartners)	1.8
09/23/2025	CH	Finalize DIP comps exhibits for DIP declaration	1.4
09/23/2025	CH	Research comparable DIP facilities without a backstop fee for potential inclusion into comp set	1.4
09/23/2025	CH	Review and provide comments to revised draft DIP objection and DIP declaration	1.7
09/23/2025	CC	Review DIP objection for consistency with financial analysis and other edits	0.8
09/23/2025	DM	Review draft MacGreevey declaration in support of UCC objection to ModivCare DIP motion	3.1
09/23/2025	DM	Revise MacGreevey declaration in support of UCC objection to ModivCare DIP motion	3.2
09/23/2025	JA	Analyze success fee calculations	0.3
09/23/2025	JA	Preparation of supporting schedules and analysis for DIP related declaration	1.0
09/23/2025	JA	Review DIP objection, draft comments and provide backup analysis for support	1.6
09/23/2025	JA	Review professional fee detail from DIP budget and evaluate alternative scenarios	0.7
09/23/2025	KBM	Review DIP issues list	0.4
09/23/2025	KBM	Review revised DIP budget sensitivity analysis	0.9
09/23/2025	KBM	Review updated DIP objection	0.9
09/23/2025	MDG	Review and comment on DIP declaration and objection	1.0
09/23/2025	MDG	Review DIP comparables for DIP declaration	2.5
09/24/2025	CH	Analyze revised DIP comps analysis prepared by Moelis	1.6
09/24/2025	CH	Correspondence with W&C team re: DIP comps and deposition topics	0.7

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Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	CH	Draft outline of deposition topics and support	2.8
09/24/2025	JA	Review items per discovery documents re: historical transactions	1.3
09/24/2025	KBM	Review information related to DIP comps	0.4
09/24/2025	MDG	Review DIP comparables	1.5
09/24/2025	MDG	Review documents used in preparation of DIP comparables in preparation for D. MacGreevey deposition	1.0
09/24/2025	MDG	Review Moelis DIP comparables	1.5
09/25/2025	CH	Call with A. Chase (W&C) re: documents relied upon for D. MacGreevey deposition	0.3
09/25/2025	CH	Compile supporting documents for D. MacGreevey (AlixPartners) declaration	2.2
09/25/2025	CH	Continue telephonic attendance of Z. Jamal (Moelis) deposition	1.0
09/25/2025	CH	Continue to compile supporting documents for D. MacGreevey (AlixPartners) declaration	1.4
09/25/2025	CH	Correspondence with W&C team and D. MacGreevey (AlixPartners) re: DIP comps and upcoming depositions	0.8
09/25/2025	CH	Research and analysis re: plan value, equity value, and exit financing for comparable DIP facilities	1.2
09/25/2025	JA	Review comps used for DIP comparison	0.5
09/25/2025	MDG	Attend conclusion of Z. Jamal (Moelis) deposition	1.3
09/25/2025	MDG	Attend deposition of Z. Jamal (Moelis)	2.5
09/25/2025	MDG	Research DIP comparables mentioned in Z. Jamal (Moelis) deposition	1.0
09/26/2025	MDG	Review DIP comparables cited by Moelis in deposition	1.5
09/27/2025	CH	Correspondence with M. Gates and D. MacGreevey (both AlixPartners) re: DIP comps analysis	0.5
09/27/2025	DM	Review MacGreevey declaration and exhibits in support off UCC objection to ModivCare DIP to prepare for upcoming deposition	5.5
09/27/2025	MDG	Review DIP comparable issues list from D. MacGreevey	1.0
09/28/2025	CH	Call with M. Gates and C. Hood (AlixPartners) re: DIP comps	0.2
09/28/2025	CH	Draft updates to backstop fee analysis for comps	1.4
09/28/2025	CH	Preparation of support and research re: DIP fee comps	1.5
09/28/2025	CH	Review deposition transcript for Z. Jamal (Moelis) re: DIP financing	1.3
09/28/2025	DM	Prepare for deposition	1.5
09/28/2025	MDG	Review and comment on DIP comparables analysis	1.4
09/28/2025	MDG	Call with M. Gates and C. Hood (AlixPartners) re: DIP comps	0.2
09/29/2025	CH	Working session with D. MacGreevey, M. Gates (AlixPartners), and J. Zakia and others (W&C) re: prepare for D. MacGreevey deposition re: DIP objection	2.9
09/29/2025	CH	Discussion with D. MacGreevey, C. Hood (AlixPartners) re: ModivCare deposition post mortem and testimony preparation	1.0
09/29/2025	CH	Meeting with C. Shore and others (W&C) re: DIP hearing preparation	1.2
09/29/2025	CH	Working session with D. MacGreevey, M. Gates (AlixPartners), and J. Zakia and others (W&C) re: prepare for D. MacGreevey deposition re: DIP objection	2.9
09/29/2025	CH	Review Debtor and lender replies to DIP objection	1.2
09/29/2025	CC	Attend deposition of D. MacGreevey re: DIP objection	2.0
09/29/2025	DM	Attend MacGreevey ModivCare deposition	2.3

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/29/2025	DM	Discussion with D. MacGreevey, C. Hood (AlixPartners) re: ModivCare deposition post mortem and testimony preparation	1.0
09/29/2025	DM	Prepare for ModivCare MacGreevey deposition	5.3
09/29/2025	KBM	Review items related to DIP objection	0.9
09/29/2025	MDG	Attend D. MacGreevey DIP deposition	2.4
09/29/2025	MDG	Review DIP objection responses	1.2
09/30/2025	CH	Continue to prepare for DIP hearing with D. MacGreevey (AlixPartners), and J. Zakia and others (W&C)	2.7
09/30/2025	CH	Prepare for DIP hearing with D. MacGreevey (AlixPartners), and J. Zakia and others (W&C)	2.8
09/30/2025	DM	Attend D. MacGreevey testimony and DIP hearing preparation	6.0
09/30/2025	JA	Respond to requests for information and perform analysis for W&C re: DIP hearing	1.2
Total Professional Hours			**213.7**

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Code: 20015424PA0001.1.6

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	38.3	$	55,918.00
Kathryn B McGlynn	$1,415	8.2		11,603.00
Johnny Lee	$1,225	1.4		1,715.00
Joel Amico	$1,150	23.5		27,025.00
Matthew D Gates	$1,120	33.4		37,408.00
Ryan Komendowski	$1,080	0.5		540.00
Thomas G Prince	$950	2.2		2,090.00
Christopher Cuomo	$910	13.9		12,649.00
Chase Hood	$850	92.3		78,455.00
Total Professional Hours and Fees		**213.7**	**$**	**227,403.00**

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/12/2025	CH	Review accounts payable and proposed vendor program payment detail	1.3
09/12/2025	CH	Review professional fee forecast	0.6
09/12/2025	CH	Review variance reporting for week ending 8/24	0.6
09/12/2025	CH	Review variance reporting for week ending 8/30	0.7
09/15/2025	TGP	Analyze the Debtors' cash management interim order	0.2
09/15/2025	TGP	Analyze the Debtors' cash management motion	1.4
09/15/2025	TGP	Analyze the Debtors' DIP budget with respect to liquidity projections	2.6
09/15/2025	TGP	Analyze the Debtors' variance reporting through the week ended August 31	1.2
09/16/2025	CC	Research transportation expense for DIP budget	1.1
09/16/2025	JA	Review cash flow reporting and comparison to budget	0.5
09/16/2025	TGP	Analyze documents provided in data room	1.4
09/16/2025	TGP	Analyze the Debtors' liquidity projections	2.4
09/17/2025	CH	Analyze variance reporting package for week ended 9/7	0.7
09/17/2025	TGP	Analyze the Debtors' variance to budget through the period ended September 7	1.7
09/17/2025	TGP	Draft questions for FTI re: actual performance versus budget	0.3
09/18/2025	JA	Development of liquidity scenarios based on company provided cash flow and business plan projections	1.5
09/18/2025	TGP	Analyze the Debtors' weekly liquidity projections	1.4
09/19/2025	JA	Develop analysis to extend case timeline	1.5
09/21/2025	TGP	Analyze the Debtors' weekly liquidity projections	1.3
09/22/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	CC	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	CC	Research liquidity and cash flow related to contracts, transportation expense, minimum liquidity, and cash	1.7
09/22/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	JA	Analyze historical cash flow performance	0.9
09/22/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	TGP	Analyze the Debtors' DIP budget projections	1.7
09/22/2025	TGP	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/23/2025	CC	Continue analysis of DIP budget and extension of case scenario	2.4
09/23/2025	CC	Participate in a call with J. Amico and C. Cuomo (AlixPartners) re: review of DIP budget extension model	0.5
09/23/2025	JA	Participate in a call with J. Amico and C. Cuomo (AlixPartners) re: review of DIP budget extension model	0.5
09/23/2025	TGP	Analyze the Debtors' DIP budget projections	1.1
09/24/2025	CH	Review liquidity and variance reporting package for week ended 9/14	0.8
09/24/2025	CC	Call with C. Cuomo, T. Prince (AlixPartners) re: liquidity analysis	0.2
09/24/2025	CC	Update weekly variance update deck in advance of committee meeting	2.8
09/24/2025	TGP	Analyze changes to the DIP budget over time	1.3
09/24/2025	TGP	Analyze the Debtors' variance report for the week ended September 14th	0.6

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	TGP	Call with C. Cuomo, T. Prince (AlixPartners) re: liquidity analysis	0.2
09/25/2025	CC	Finalize weekly variance update deck in advance of Committee meeting	0.6
09/25/2025	TGP	Analyze the Debtors' DIP budget projections	1.2
09/26/2025	JA	Analyze liquidity scenarios under assumptions	1.0
09/27/2025	CC	Edit and review liquidity analysis files for preparation before sending to W&C	0.6
09/27/2025	CC	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/27/2025	CC	Respond to questions from D. MacGreevey of AlixPartners related to liquidity and revolver	1.4
09/27/2025	DM	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/27/2025	JA	Analyze liquidity scenarios and prepare summary output	1.0
09/27/2025	JA	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/29/2025	JA	Analyze cash variance reports and prepare diligence questions	0.5
09/29/2025	JA	Prepare cash flow scenario schedules	0.7
09/29/2025	TGP	Analyze the Debtors' variance report for the period ended September 21st	0.8
09/30/2025	CC	Respond to question from J. Amico (AlixPartners) re: contracts	0.2
09/30/2025	TGP	Analyze variance report for week ended September 21st	0.4
Total Professional Hours			**52.0**

AlixPartners

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Joel Amico	$1,150	9.8		11,270.00
Thomas G Prince	$950	21.9		20,805.00
Christopher Cuomo	$910	13.2		12,012.00
Chase Hood	$850	5.4		4,590.00
Total Professional Hours and Fees		**52.0**	**$**	**51,159.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
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Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	TGP	Analyze the Debtors' operating model with projections through 2026	0.8
09/17/2025	AP	Review files uploaded to the data room by Debtors to identify relevant files supporting Debtors' financial projections	1.5
09/17/2025	TGP	Analyze the Debtors' operating model with projections through 2026	1.1
09/18/2025	AP	Analyze Debtors' financial projections and supporting documents for NEMT with a focus on revenue, rate and volume trends, and customer contracts	2.4
09/18/2025	JA	Review underlying financial model and prepare diligence questions	1.1
09/18/2025	TGP	Analyze the Debtors' operating model	1.6
09/19/2025	GM	Call with J Wang, G Magrisi (AlixPartners) re: business plan assessment document review and planning	0.4
09/19/2025	JW	Call with J Wang, G Magrisi (AlixPartners) re: business plan assessment document review and planning	0.4
09/19/2025	JA	Review business plan and develop issues for diligence call with company	1.5
09/19/2025	JL	Review preliminary information on business plan and note follow up items	0.6
09/19/2025	TGP	Analyze the Debtors' 2026 projections	1.6
09/22/2025	AP	Analyze Debtors' financial projections and supporting documents for NEMT with a focus on expenses, including service costs	2.8
09/22/2025	AP	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	AP	Review Debtors' purchased services schedule for NEMT with a focus on vendor and third party provider costs	2.6
09/22/2025	CH	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	CC	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	GM	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	JW	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	LL	Reviewed and annotated internal management memorandums re: current operating model, business challenges, and go-forward assumptions, formulated initial working hypotheses	1.2
09/22/2025	LL	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/23/2025	AP	Analyze Debtors' financial projections and supporting documents for PCS with a focus on expenses, including service costs	2.8
09/23/2025	AP	Analyze Debtors' financial projections and supporting documents for PCS with a focus on revenue, hours and rate trends, customer contracts	2.5
09/23/2025	AP	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	AP	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	DM	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/23/2025	GM	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	GM	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	GM	Participate in a call with G. Magrisi, S Clark (AlixPartners) re: business plan workstreams and project plan	0.4
09/23/2025	JW	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	JW	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	LL	Review historical profit & loss statements provided by management; identified revenue/cost trends, normalized adjustments, and areas requiring clarification	2.4
09/23/2025	LL	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	SC	Participate in a call with G. Magrisi, S Clark (AlixPartners) re: business plan workstreams and project plan	0.4
09/24/2025	AP	Analyze Debtors' financial projections and supporting documents for RPM with a focus on expenses, including service costs	2.6
09/24/2025	AP	Analyze Debtors' financial projections and supporting documents for RPM with a focus on revenue, hours and rate trends, customer contracts	2.7
09/24/2025	AP	Develop customer contract revenue waterfall with key volume and rate metrics for NEMT business	2.4
09/24/2025	SC	Prepare high-level view functional distribution of headcount for business plan workstream.	1.7
09/24/2025	SC	Review client financial documents and organizational charts for business plan workstream.	0.9
09/24/2025	TGP	Analyze the Debtors' business plan model	2.3
09/25/2025	AP	Develop customer contract revenue waterfall with key volume and rate metrics for NEMT business	2.8
09/25/2025	AP	Develop project plan and time line with key milestones for Debtors' business plan review	1.5
09/25/2025	AP	Prepare key revenue and cost drivers for ModivCare businesses to pressure test Debtors' financial projections	2.7
09/25/2025	LL	Prepare questionnaire for management re: assumptions for financial projections, performance improvement initiatives and cost-out programs.	1.6
09/25/2025	SC	Analyze materials received from Debtors for business plan workstream.	0.6
09/25/2025	TGP	Analyze the Debtors' business plan model	2.9
09/26/2025	AP	Analyze customer contract revenue waterfall with key volume and rate metrics for NEMT business for the top 20 contracts	2.7
09/26/2025	AP	Compile key questions for Debtors' management and data requests on the Debtors' latest financial projections and FY26-30 business plan	2.1
09/26/2025	AP	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/26/2025	AP	Review Debtors' latest financial projections re: business plan and valuation disclosure filed on 9/23	2.5
09/26/2025	GM	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	JW	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	JL	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	LL	Update data request form to include additional business plan requests and flagged critical items for prioritization by Management	1.2
09/26/2025	LL	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	RK	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	RK	Review latest business plan produced and corresponding assumptions.	2.4
09/26/2025	SC	Prepare materials in relation to business plan workstream, specifically around data requirements and questions for management.	0.6
09/26/2025	TGP	Analyze investment banker fees in comparable cases	2.7
09/26/2025	TGP	Analyze the Debtors' business plan model	1.3
09/29/2025	AP	Analyze customer contract attrition and revenue impacts for NEMT business for the top 20 contracts	2.3
09/29/2025	AP	Analyze Segment level projections in the Debtors' business plan and valuation disclosure filed on 9/23	2.8
09/29/2025	LL	Preparation of financial models by business unit (NEMT, PCS, RPM/Higi) with variance analysis	1.8
09/29/2025	SC	Analyze documents received from Debtors re: on going cost savings initiatives to weave into hypotheses for business plan workstream	1.4
09/29/2025	SC	Analyze financial data, including understanding historical trends and future projections, provided by Debtors and SEC filings for business plan workstream	2.8
09/29/2025	SC	Analyze staffing / organization related documents provided by Debtors to create questions and hypotheses for business plan workstream	2.3
09/29/2025	SC	Review financial data, including understanding historical trends and future projections, provided by Debtors and SEC filings for business plan workstream	1.7
09/29/2025	TGP	Analyze the Debtors' 2026 projections	1.3
09/29/2025	TGP	Research the Debtors' cleansing materials filed in 2025	1.1
09/30/2025	AP	Analyze customer contract attrition and revenue impacts for PCS business for the top 20 contracts	2.6
09/30/2025	AP	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	AP	Prepare summary of information requests to discuss with Debtors' financial advisor in support of FY26-30 business plan	1.9
09/30/2025	AP	Research market and growth outlook for each segment re: Debtors' business plan projections filed on 9/23	2.7
09/30/2025	LL	Analyze historical (2022-2024) and projections (2025-2030) for service expense across business units and assessment of cost improvement levers	2.4
09/30/2025	LL	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
09/30/2025	SC	Analyze historical and future looking cost data for business plan workstream	2.6
09/30/2025	SC	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
09/30/2025	SC	Create materials visualizing trends in historical and future looking costs and revenue for business plan workstream	2.9
09/30/2025	SC	Review materials visualizing trends in historical and future looking costs and revenue for business plan workstream	2.3
09/30/2025	TGP	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
Total Professional Hours			**115.6**

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Greg Magrisi	$1,250	2.9		3,625.00
Jerry Wang	$1,225	2.5		3,062.50
Johnny Lee	$1,225	1.2		1,470.00
Ashutosh Panda	$1,150	51.4		59,110.00
Joel Amico	$1,150	2.6		2,990.00
Ryan Komendowski	$1,080	3.0		3,240.00
Thomas G Prince	$950	17.1		16,245.00
Christopher Cuomo	$910	0.6		546.00
Susan Clark	$910	20.6		18,746.00
Chase Hood	$850	0.6		510.00
Lucas Lovatto	$835	12.8		10,688.00
Total Professional Hours and Fees		**115.6**	**$**	**120,670.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	TGP	Analyze documents from the Debtors provided through discovery with respect to retention programs	0.8
09/21/2025	TGP	Analyze Moelis retention application	1.4
09/22/2025	MDG	Review analysis of Moelis fees	0.7
09/22/2025	TGP	Analyze Moelis fee structure	1.2
09/23/2025	TGP	Analyze Moelis fee structure	0.9
09/23/2025	TGP	Review FTI retention application	0.4
09/23/2025	TGP	Review Moelis retention application	0.4
09/24/2025	MDG	Call with M. Gates, T. Prince (AlixPartners) re: analysis of retention applications for Moelis and FTI	0.2
09/24/2025	TGP	Call with M. Gates, T. Prince (AlixPartners) re: analysis of retention applications for Moelis and FTI	0.2
09/25/2025	TGP	Analyze FTI's retention application	1.1
09/25/2025	TGP	Review data room documents with respect to the Debtors' business plan	2.7
09/29/2025	TGP	Analyze success fees in comparable cases	2.8
09/30/2025	MDG	Review analysis of Debtors' professional fees	0.8
09/30/2025	TGP	Analyze investment banking fees in comparable cases	1.4
09/30/2025	TGP	Analyze success fees in comparable cases	1.1
Total Professional Hours			**16.1**

AlixPartners

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Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

PROFESSIONAL	RATE	HOURS	FEES
Matthew D Gates	$1,120	1.7	1,904.00
Thomas G Prince	$950	14.4	13,680.00
Total Professional Hours and Fees		**16.1**	**$ 15,584.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Review first day declaration re: company and case background	1.6
09/10/2025	JA	Review background information and first day filings	1.7
09/10/2025	TGP	Analyze the Debtors' 2024 10-K	1.2
09/10/2025	TGP	Analyze the Debtors' first day declaration	1.7
09/11/2025	CH	Download data room documents to internal site for team	1.1
09/11/2025	CH	Initial review of data room document uploads	1.4
09/11/2025	CC	Create and edit due diligence request list across 13 week cash flow, DIP, M&A, investigation and other categories	2.6
09/11/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: organize due diligence request list	0.3
09/11/2025	JA	Draft intro due diligence questions	1.5
09/11/2025	JA	Review key legal issues based on Akin input	0.7
09/11/2025	JL	Review initial request list	0.6
09/11/2025	JL	Review case filings to prepare for kick off	0.6
09/11/2025	MDG	Review initial due diligence material provided	2.4
09/11/2025	TGP	Analyze documents provided in care package from the Debtors	2.6
09/11/2025	TGP	Analyze the Debtors' first day declaration	1.1
09/11/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: organize due diligence request list	0.3
09/11/2025	TGP	Review discovery notices in connection with creation of initial diligence request list	0.6
09/11/2025	TGP	Update diligence list with initial diligence requests	1.4
09/11/2025	TGP	Update initial diligence request list with additional requests	0.6
09/12/2025	CC	Make additional updates to due diligence request re: business plan and formatting	2.3
09/12/2025	DM	Review revised ModivCare diligence tracker	0.5
09/12/2025	DM	Revise draft ModivCare diligence tracker	0.8
09/12/2025	JA	Review background information and update to due diligence list	1.6
09/12/2025	JA	Review historical financial filings and disclosures	1.0
09/12/2025	MDG	Further review of due diligence material provided	0.8
09/12/2025	MDG	Review due diligence list and provide comments	1.0
09/12/2025	TGP	Analyze the Debtors' first day declaration	1.3
09/12/2025	TGP	Review documents provided by the Debtors in connection with initial diligence requests	1.2
09/13/2025	DM	Review and revise the ModivCare diligence tracker	0.5
09/15/2025	CH	Download and review new uploads to data room	1.2
09/15/2025	CC	Prepare indexing for data room downloads	0.8
09/15/2025	CC	Update due diligence tracker for data received	0.4
09/15/2025	JA	Update to due diligence list based on data room files	0.5
09/15/2025	KBM	Review information available in data room	0.3
09/15/2025	KBM	Review information re: CMS receivables	0.4
09/15/2025	MDG	Review data room provided by Debtors	2.5
09/16/2025	CH	Research 10-K filings re: CMS and government receivables	0.6
09/16/2025	CC	Draft email to D. MacGreevey (AlixPartners) summarizing key terms of critical vendor motion	0.6
09/16/2025	CC	Review 10-K and earnings transcript for general business and financial trends	0.6

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Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	DM	Email with attachments with internal counsel re: ModivCare NDA	0.3
09/16/2025	JA	Review company public disclosures and analysis of prior transactions	1.5
09/16/2025	KBM	Review draft revisions to critical vendor order	0.8
09/16/2025	KBM	Review information related to unencumbered assets and related value	0.4
09/16/2025	MDG	Review W&C document re: unencumbered assets	1.5
09/17/2025	DM	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	DM	Review ModivCare 10-K re: CMS exposure	0.7
09/17/2025	JA	Review data room and update diligence list for revised cash forecast requests	1.0
09/17/2025	JA	Review documents from W&C discovery request	1.2
09/17/2025	JL	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	KBM	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	MDG	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	MDG	Research Debtors' New Jersey contracts and RFP	0.4
09/17/2025	MDG	Research unencumbered assets	0.8
09/17/2025	TGP	Analyze collateral package for the Debtors' prepetition debt	1.4
09/17/2025	TGP	Analyze the Debtors' interest in the Matrix JV	1.3
09/17/2025	TGP	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	TGP	Review comments to the Debtors' proposed final cash management order	0.4
09/18/2025	CH	Continue review of Relativity document production for documents relative to DIP and liquidity workstreams	2.6
09/18/2025	CH	Review Relativity document production for documents relative to DIP and liquidity workstreams	2.7
09/18/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: data room documents	0.3
09/18/2025	CC	Review files in data room disclosure for case analysis	2.4
09/18/2025	KBM	Review revised critical vendor motion	0.6
09/18/2025	TGP	Analyze documents from the Debtors provided through discovery with respect board materials	1.2
09/18/2025	TGP	Analyze the Debtors' collateral package for prepetition debt	0.9
09/18/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: data room documents	0.3
09/19/2025	CC	Begin analysis of SOFAs and SOALs	2.3
09/19/2025	CC	Continue analysis of SOFAs and SOALs re: payments and assets	2.9
09/19/2025	CC	Call with C. Cuomo and M. Gates (AlixPartners) re: SOFA/SOAL presentation	0.2
09/19/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: review of diligence tracker and discovery	0.5
09/19/2025	CC	Research comparable companies for valuation	1.1
09/19/2025	CC	Review discovery files and organize associated diligence tracker	0.9
09/19/2025	JA	Analyze customer contracts and corresponding payment timing to develop go forward liquidity view	1.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/19/2025	MDG	Call with C. Cuomo and M. Gates (AlixPartners) re: SOFA/SOAL presentation	0.2
09/19/2025	MDG	Begin presentation on SOFAs and SOALs	0.4
09/19/2025	MDG	Review due diligence request list	0.5
09/19/2025	TGP	Analyze the Debtors' interest in the Matrix JV	1.4
09/19/2025	TGP	Analyze the Debtors' schedules of assets and liabilities	1.1
09/19/2025	TGP	Analyze the Debtors' statements of financial affairs	0.9
09/19/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: review of diligence tracker and discovery	0.5
09/19/2025	TGP	Review documents provided by the Debtors in comparison to diligence requests	0.8
09/19/2025	TGP	Update diligence request list	0.6
09/20/2025	CC	Continue analysis of SOFAs and SOALs re: assets by debtor	2.6
09/20/2025	CC	Prepare analysis of SOFAs and SOALs re: liabilities and claims	1.4
09/21/2025	MDG	Research information on unencumbered assets in SOALs	2.5
09/22/2025	CH	Review new items uploaded to virtual data room	0.6
09/22/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: analyze SOFA/SOALs payments and assets	0.7
09/22/2025	KBM	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	KBM	Review analysis of unencumbered assets and related value	0.6
09/22/2025	MDG	Continue unencumbered assets analysis	1.3
09/22/2025	MDG	Review diligence list for unencumbered assets requests	0.8
09/22/2025	TGP	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	TGP	Analyze the Debtors' historical financials	1.6
09/22/2025	TGP	Analyze the Debtors' joint venture interests	1.6
09/22/2025	TGP	Analyze the Debtors' reported assets	1.4
09/22/2025	TGP	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: analyze SOFA/SOALs payments and assets	0.7
09/23/2025	JA	Analyze underlying financial projection detail to evaluate supporting assumptions	0.8
09/23/2025	JA	Review data room and analysis of documents	0.5
09/23/2025	TGP	Analyze the Debtors' schedules of assets and liabilities	1.9
09/23/2025	TGP	Analyze the Debtors' statements of financial affairs	2.4
09/23/2025	TGP	Draft questions for FTI re: the SOFAs and SOALs	0.4
09/23/2025	TGP	Review documents uploaded to the data room in response to diligence requests	0.8
09/23/2025	TGP	Update diligence tracker based on documents uploaded to the data room	0.4
09/24/2025	CC	Respond to question from D. MacGreevey of AlixPartners related to letters of credit and net debt	0.3
09/24/2025	KBM	Review outstanding information requests	0.4
09/24/2025	TGP	Analyze the Debtors' SOALs	1.2
09/24/2025	TGP	Analyze the Debtors' SOFAs	1.1
09/25/2025	CC	Download documentation related to comparables and DIP budget extension to be shared with W&C	0.8
09/25/2025	JA	Review capital structure assumptions in Plan and reconcile with Plan documents	1.0

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Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	JA	Review discovery requests and prepare responses	0.7
09/25/2025	JA	Review sets of financial projections and reconcile of changes	1.2
09/25/2025	TGP	Analyze the Debtors' historical financials	1.3
09/26/2025	CH	Review financial model and related assumptions re: go-forward business plan	2.1
09/26/2025	CC	Respond to questions associated with information request list and document production	0.3
09/26/2025	JA	Review data room documents related to financial projections support and draft diligence questions	1.0
09/26/2025	JA	Review documents produced by Debtors and prepare follow up questions	1.5
09/26/2025	KBM	Review 2025-2030 financial projections	1.1
09/26/2025	MDG	Continue unencumbered assets analysis	1.5
09/27/2025	JA	Preparation of materials for deposition prep	1.5
09/27/2025	MDG	Update and send diligence list to FTI	0.4
09/28/2025	JA	Prepare summary financial information for W&C	0.5
09/29/2025	JA	Analyze certain prepetition vendor payment status and prepare analysis	0.8
09/29/2025	JA	Analyze historical cash projections and changes over time	0.8
09/29/2025	JA	Prepare financial analyses for W&C background	1.5
09/29/2025	KBM	Revise SOFA/Schedules presentation for the Committee	0.8
09/29/2025	MDG	Research 8-K filings for prior financial projections	0.8
09/29/2025	TGP	Analyze the Debtors' historical financials	1.3
09/30/2025	AP	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	GM	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JW	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JA	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JA	Review data room and perform update of diligence list for required information	1.3
09/30/2025	JL	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	KBM	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	KBM	Finalize SOFA/Schedules presentation to the Committee	0.3
09/30/2025	LL	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	MDG	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	MDG	Prepare analysis of unencumbered assets	1.5
09/30/2025	RK	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	SC	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	TGP	Analyze the Debtors' historical financials	1.1
09/30/2025	TGP	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
Total Professional Hours			**140.0**

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.3	$	4,818.00
Kathryn B McGlynn	$1,415	6.9		9,763.50
Greg Magrisi	$1,250	0.4		500.00
Jerry Wang	$1,225	0.4		490.00
Johnny Lee	$1,225	2.1		2,572.50
Ashutosh Panda	$1,150	0.4		460.00
Joel Amico	$1,150	25.4		29,210.00
Matthew D Gates	$1,120	20.2		22,624.00
Ryan Komendowski	$1,080	0.4		432.00
Thomas G Prince	$950	41.5		39,425.00
Christopher Cuomo	$910	24.3		22,113.00
Susan Clark	$910	0.4		364.00
Chase Hood	$850	13.9		11,815.00
Lucas Lovatto	$835	0.4		334.00
Total Professional Hours and Fees		**140.0**	**$**	**144,921.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CC	Compare critical vendor motion and interim order to precedent cases to establish appropriate modification requests	0.7
09/10/2025	CC	Review critical vendor motion and interim order	0.4
09/10/2025	JA	Review cash first day motion and declaration materials to prepare issues list	1.0
09/10/2025	MDG	Review first day motions and prepare issues lists	2.5
09/10/2025	TGP	Analyze the Debtors' cash management motion	0.6
09/10/2025	TGP	Create issues list re: the Debtors' cash management motion	0.4
09/11/2025	KBM	Review issues related to cash management and critical vendor motions	0.9
09/11/2025	MDG	Finalize and send list of issues with cash management motion to D. MacGreevey	0.4
09/12/2025	TGP	Analyze the Debtors' cash management motion in comparison to other cases	0.9
09/12/2025	TGP	Analyze the Debtors' cash management motion noticing and reporting terms	0.6
09/12/2025	TGP	Analyze the Debtors' motion to pay prepetition claims	0.4
09/15/2025	CH	Review and summarize procedural first day motions	0.7
09/15/2025	CH	Review and summarize taxes and fees motion	0.9
09/15/2025	CH	Review and summarize trading procedures and net operating losses motion	0.6
09/15/2025	CH	Review and summarize utilities motion	0.7
09/15/2025	JA	Review and provide comments on first day motion and prep for upcoming FTI call	1.1
09/15/2025	MDG	Review first day motions	2.5
09/15/2025	TGP	Analyze the Debtors' customer programs motion	1.1
09/15/2025	TGP	Analyze the Debtors' insurance motion	0.8
09/15/2025	TGP	Analyze the Debtors' wages motion	1.3
09/16/2025	DM	Call with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor program analysis	0.3
09/16/2025	DM	Review email from C. Cuomo (AlixPartners) re: cross reference of our ModivCare trade vendor motion issues list to W&C markup	0.3
09/16/2025	DM	Review W&C comments to final ModivCare trade vendor order	0.3
09/16/2025	JA	Call with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor program analysis	0.3
09/16/2025	MDG	Review and provide comments to W&C on critical vendor motion	0.5
09/16/2025	MDG	Review W&C markup of cash management motion	0.7
09/18/2025	JA	Diligence on revised vendor motion and draft of issues list	1.0
09/18/2025	MDG	Review updated draft of cash management motion	0.3
09/22/2025	CH	Review lease rejection motion in relation to lease claims analysis	0.8
09/22/2025	CH	Review Moelis retention application re: DIP financing related fees	0.4
09/22/2025	CH	Review ordinary course professionals motion	0.3
09/24/2025	JA	Preparation of supporting details for depositions	0.9
09/24/2025	KBM	Review updates to Cash Management order	0.6
09/24/2025	MDG	Review updates to cash management motion	0.5
09/25/2025	MDG	Email to D. MacGreevey and K. McGlynn re: intercompany transfers and cash management motion	0.2
09/26/2025	JA	Attend deposition of Chad Shandler (FTI)	2.0
09/26/2025	JL	Participate and listen in on C. Shandler (FTI) Deposition	2.1
Total Professional Hours			**30.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Kathryn B McGlynn	$1,415	1.5		2,122.50
Johnny Lee	$1,225	2.1		2,572.50
Joel Amico	$1,150	6.3		7,245.00
Matthew D Gates	$1,120	7.6		8,512.00
Thomas G Prince	$950	6.1		5,795.00
Christopher Cuomo	$910	1.1		1,001.00
Chase Hood	$850	4.4		3,740.00
Total Professional Hours and Fees		**30.0**	**$**	**32,302.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	CH	Review general unsecured and lease claim analysis prepared by Debtors	0.9
Total Professional Hours			**0.9**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Chase Hood	$850	0.9	$	765.00
Total Professional Hours and Fees		**0.9**	**$**	**765.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	MR	Research ModivCare business segments for guideline company analysis.	1.7
09/10/2025	RK	Review case materials for background research and valuation ramp.	1.5
09/11/2025	JM	Assess uptier transaction.	1.4
09/11/2025	JM	Review First Day Declaration.	2.1
09/11/2025	JM	Review ModivCare's 2024 10-K.	0.6
09/11/2025	MB	Conduct valuation analysis	0.6
09/11/2025	MR	Analyze guideline companies for ModivCare valuation analysis.	1.8
09/11/2025	RK	Research ModivCare comparable company for valuation.	2.8
09/11/2025	RK	Research ModivCare comparable company payer mix for valuation.	2.6
09/12/2025	JM	Assess ModivCare's capital structure.	1.8
09/12/2025	JM	Review analyst reports.	0.7
09/12/2025	JM	Search Capital IQ for historical medical transport transactions.	2.5
09/12/2025	MB	Review data request list	0.3
09/12/2025	MR	Analyze guideline company financial metrics for ModivCare valuation analysis.	2.7
09/12/2025	MR	Review ModivCare analyst reports for guideline company analysis.	2.0
09/12/2025	RK	Research guideline company transactions for valuation analysis.	0.9
09/12/2025	RK	Review disclosure statement for case background.	2.1
09/12/2025	RK	Review documents provided by counsel for valuation analysis.	3.0
09/15/2025	JM	Search Capital IQ for historical medical transport transactions.	1.4
09/15/2025	JM	Search Capital IQ for historical personal care transactions.	2.8
09/15/2025	JM	Update valuation analysis.	1.7
09/15/2025	MB	Conducted valuation research	0.8
09/15/2025	MR	Develop guideline company method for ModivCare valuation.	2.0
09/15/2025	MR	Review EBITDA forecast from data room for ModivCare valuation analysis.	1.9
09/16/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare Allston workstream	0.2
09/16/2025	DM	Email to M. Brown, J. Kopa and M. Rule (AlixPartners) re: valuation workstream	0.3
09/16/2025	JM	Review S&P credit rating reports.	1.6
09/16/2025	JM	Search Capital IQ for historical personal care transactions.	1.0
09/16/2025	MB	Conducted valuation analysis	0.3
09/16/2025	MR	Research ModivCare segment financial performance for guideline company valuation analysis.	2.1
09/16/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare Allston workstream	0.2
09/17/2025	DM	Review and distribute CVs for proposed ModivCare valuation expert candidates to W&C team	0.6
09/17/2025	JM	Update valuation analysis.	2.8
09/17/2025	MR	Perform analysis of monitoring segment guideline companies for ModivCare valuation analysis.	2.8
09/17/2025	MR	Prepare guideline transaction analysis for ModivCare valuation.	2.2
09/17/2025	RK	Preparation of AMCI valuation analysis.	1.4
09/17/2025	RK	Review guideline company comparables for valuation analysis.	2.0
09/18/2025	JM	Review Board of Directors meeting materials.	0.7
09/18/2025	JM	Review FTI cash flow projections.	1.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	MR	Review Matrix segment financial information in ModivCare public filings.	2.9
09/18/2025	RK	Review documents produced for AMCI valuation analysis.	2.3
09/19/2025	CC	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	JM	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	JM	Review Board of Directors meeting materials.	3.0
09/19/2025	JM	Review ModivCare advisor presentations.	2.6
09/19/2025	JM	Update valuation analysis.	1.4
09/19/2025	MR	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	MR	Perform research re: health care industry companies for market approach analysis.	1.0
09/19/2025	MR	Review guideline company analyst reports for ModivCare valuation analysis.	2.1
09/19/2025	RK	Review current business plan produced for AMCI valuation analysis.	2.0
09/19/2025	TGP	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/20/2025	DM	Review analysis of ModivCare post emergence equity dilution	0.4
09/22/2025	MR	Perform analysis of ModivCare capital structure for valuation analysis.	0.8
09/22/2025	RK	Review documents produced for AMCI valuation analysis.	1.8
09/23/2025	MR	Perform analysis of ModivCare capital structure for valuation analysis.	0.4
09/23/2025	RK	Preparation of AMCI valuation analysis.	2.8
09/24/2025	RK	Review document production for business plans.	2.3
09/25/2025	RK	Preparation of AMCI valuation analysis.	0.8
09/25/2025	RK	Review historical board meeting materials from document production for projection analysis.	2.6
09/29/2025	JM	Draft valuation report.	3.0
09/29/2025	JM	Review advisor presentations.	1.7
09/29/2025	JM	Update valuation analysis	2.6
09/29/2025	MR	Prepare draft presentation materials for ModivCare valuation analysis.	2.3
09/29/2025	RK	Review documents produced for business plan review.	2.0
09/30/2025	JM	Draft valuation report.	3.0
09/30/2025	JM	Review analyst reports.	1.3
09/30/2025	JM	Update valuation analysis.	2.4
09/30/2025	MR	Analyze financial metrics for guideline companies for ModivCare valuation analysis.	2.1
09/30/2025	MR	Analyze market data for guideline companies for ModivCare valuation analysis.	1.5
09/30/2025	MR	Perform segment analysis of ModivCare guideline companies for valuation analysis.	3.0
09/30/2025	RK	Review documents produced for valuation analysis.	1.3
Total Professional Hours			**118.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Marc Brown	$1,415	2.0		2,830.00
Ryan Komendowski	$1,080	34.4		37,152.00
Matthew Root	$1,000	35.7		35,700.00
Thomas G Prince	$950	0.4		380.00
Christopher Cuomo	$910	0.4		364.00
Jyoji Morimoto	$910	44.2		40,222.00
Total Professional Hours and Fees		**118.6**	**$**	**118,838.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	TGP	Analyze the Debtors' RSA with respect to treatment of creditors	1.6
09/11/2025	CH	Review plan and disclosure statement re: exit financing and claim recovery mechanics	1.8
09/12/2025	TGP	Analyze the Debtors' RSA	0.8
09/12/2025	TGP	Analyze the Debtors' RSA term sheet	0.6
09/24/2025	CH	Analyze filed financial projections and valuation and related assumptions	1.1
09/24/2025	CH	Analyze filed liquidation analysis and related assumptions	0.9
09/24/2025	DM	Review filed ModivCare disclosure statement exhibits and memo to team re: diligence of same	1.2
09/24/2025	DM	Prepare memorandum to AlixPartners' internal team re: ModviCare disclosure statement exhibits and diligence of same	0.5
09/24/2025	JA	Review Disclosure Statement filed exhibits and prepare diligence questions	1.5
09/24/2025	MDG	Review disclosure statement exhibits	1.4
09/26/2025	KBM	Review initial settlement offer	0.3
09/30/2025	MDG	Review disclosure statement objection	0.8
Total Professional Hours			**12.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Kathryn B McGlynn	$1,415	0.3		424.50
Joel Amico	$1,150	1.5		1,725.00
Matthew D Gates	$1,120	2.2		2,464.00
Thomas G Prince	$950	3.0		2,850.00
Chase Hood	$850	3.8		3,230.00
Total Professional Hours and Fees		**12.5**	**$**	**13,175.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	DM	Attend hearing re: ModivCare trade vendor payment motion	0.5
09/18/2025	KBM	Attend hearing re: critical vendor motion	0.4
09/25/2025	CH	Telephonic attendance of Z. Jamal (Moelis) deposition	2.9
09/26/2025	CC	Attend deposition of C. Shandler (FTI) re: extension of budget	1.9
09/29/2025	CH	Attend deposition of D. MacGreevey (AlixPartners) re: DIP objection	1.8
09/29/2025	JA	Attend MacGreevey deposition	2.2
09/30/2025	CH	Attend hearing re: DIP objection	1.5
09/30/2025	CH	Continue to attend hearing re: DIP objection	2.0
09/30/2025	CH	Attend ModivCare DIP hearing breakout meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, L. Miranda (W&C), D. MacGreevey and C. Hood (AlixPartners) re: DIP objection	2.0
09/30/2025	DM	Attend ModivCare DIP hearing	3.5
09/30/2025	DM	Attend ModivCare DIP hearing breakout meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, L. Miranda (W&C), D. MacGreevey and C. Hood (AlixPartners) re: DIP objection	2.0
09/30/2025	JA	Attend DIP hearing	3.0
09/30/2025	KBM	Attend DIP hearing	3.5
09/30/2025	MDG	Attend continued DIP hearing	1.6
09/30/2025	MDG	Attend DIP hearing	1.6
Total Professional Hours			**30.4**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.0	$	8,760.00
Kathryn B McGlynn	$1,415	3.9		5,518.50
Joel Amico	$1,150	5.2		5,980.00
Matthew D Gates	$1,120	3.2		3,584.00
Christopher Cuomo	$910	1.9		1,729.00
Chase Hood	$850	10.2		8,670.00
Total Professional Hours and Fees		**30.4**	**$**	**34,241.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/11/2025	BF	Draft engagement letter	1.1
09/11/2025	BF	Draft AlixPartners retention documents	2.1
09/11/2025	DM	Begin review ModivCare retention package	0.6
09/11/2025	DM	Continue review of draft ModivCare retention package	0.8
09/11/2025	SH	Review ModiveCare UCC retention documents	0.4
09/16/2025	KSM	Correspondence with D. MacGreevey and S. Rosenfeld (AlixPartners), D. Litz (W&C) re: retention	0.2
09/17/2025	JB	Prepare parties in interest list for firm database	1.2
09/17/2025	JB	Review parties in interest list for disclosure purposes	0.8
09/18/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Car-Iron	1.8
09/18/2025	JB	Draft disclosures to be included in retention documents for parties beginning with 111-Cap	1.6
09/19/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Nati-Ros	1.9
09/19/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Ive-Nat	1.7
09/22/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Tru-Ze	1.4
09/22/2025	JB	Draft disclosures to be included in retention documents for parties beginning with RSU-Tri	1.6
09/22/2025	KSM	Correspondence with J. Braverman (AlixPartners) re: relationship disclosures	0.2
09/23/2025	JB	Update draft disclosures to be included in retention documents in response to comments from K. Sundt McClarren (AlixPartners)	0.6
09/23/2025	KSM	Edit draft relationship disclosures	1.2
09/23/2025	KSM	Revise draft AlixPartners' retention documents	0.6
09/26/2025	JB	Compare updated parties in interest list to previous version for disclosure purposes	1.1
09/26/2025	JB	Draft disclosures to be included in retention documents for parties beginning with 1A-Bi	1.7
09/26/2025	JB	Prepare list for firm database with additional parties in interest	2.4
09/26/2025	SH	Correspondence re: discovery requests with J. Amico and S. Rosenfeld (AlixPartners)	0.4
09/29/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Del-Ind	1.6
09/29/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Bin-Deb	1.8
09/30/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Pac-Ver	2.9
09/30/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Ind-Orl	1.9
Total Professional Hours			**33.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.4	$	2,044.00
Kaitlyn Sundt McClarren	$715	2.2		1,573.00
Sari Hammer	$660	0.8		528.00
Brooke Filler	$605	3.2		1,936.00
Jennifer Braverman	$565	26.0		14,690.00
Total Professional Hours and Fees		**33.6**	**$**	**20,771.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Discovery
Code: 20015424PA0001.1.21

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	CH	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	DM	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	JA	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	MDG	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	MDG	Produce documents in response to discovery request	0.3
Total Professional Hours			**2.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Discovery
Code: 20015424PA0001.1.21

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Joel Amico	$1,150	0.5		575.00
Matthew D Gates	$1,120	0.8		896.00
Chase Hood	$850	0.5		425.00
Total Professional Hours and Fees		**2.3**	**$**	**2,626.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/29/2025	CH	Travel from Lufkin, TX to Houston, TX (for D. MacGreevey deposition preparation)	2.0
09/29/2025	DM	Travel from New York, NY to W&C Houston, TX (to attend ModivCare deposition and DIP hearing)	6.0
09/30/2025	CH	Travel from Houston, TX to Lufkin, TX (return from DIP hearing)	3.0
Total Professional Hours			**11.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.0	$	8,760.00
Chase Hood	$850	5.0		4,250.00
Total Professional Hours and Fees		**11.0**	**$**	**13,010.00**
Less 50% Travel Fees				(6,505.00)
Total Professional Fees			**$**	**6,505.00**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
09/25/2025	Airfare David MacGreevey 2025-09-29 LGA- IAH	340.49
09/27/2025	Taxi/Car Service David MacGreevey Home to LGA airport	144.94
09/29/2025	Taxi/Car Service David MacGreevey Iah airport to Client office	119.47
09/29/2025	Roundtrip mileage from Home to White & Case Houston office. Mileage Chase Hood 235 Miles	164.50
09/29/2025	Lodging David MacGreevey - JW Marriott, Houston, TX 2025-09-29 2025-09-30	500.00
09/29/2025	Lodging Chase Hood JW Marriott, Houston, TX 2025-09-29 2025-09-30	432.37
09/29/2025	Individual Meal - David MacGreevey - Breakfast	9.93
09/29/2025	Group Meal - David MacGreevey - Dinner - David MacGreevey; Chase Hood	150.00
09/30/2025	Parking/Tolls Chase Hood Parking - White & Case office	40.00
09/30/2025	Parking/Tolls Chase Hood Hotel parking for deposition and DIP hearing	60.62
09/30/2025	Lodging David MacGreevey JW Marriott, Houston, TX 2025-09-30 2025-10-01	500.00
09/30/2025	Individual Meal - David MacGreevey - Breakfast	53.03
09/30/2025	Individual Meal - Chase Hood - Dinner	39.56
09/30/2025	Individual Meal - Chase Hood - Breakfast	12.87
Total Expenses		**2,567.78**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20014495Pa0001

Expenses		Amount
Airfare		340.49
Ground Transportation		529.53
Lodging		1,432.37
Meals		265.39
Total Expenses	**USD**	**2,567.78**

Exhibit B

Second Monthly Fee Statement
October 1, 2025 through October 31, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: December 17, 2025 @ 4:00 p.m. (CT)

SECOND MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	10/1/2025	10/31/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$1,653,272.80 (80% of $2,066,591.00)	
Total expenses requested in this Fee Statement:	$17,382.17	
Total fees and expenses requested in this Fee Statement:	$1,670,654.97	
Blended hourly rate for professionals:	$1,032.83	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	55.6	$ 81,176.00
Kevin Nystrom	Partner & Managing Director	$1,430	0.2	286.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	37.7	53,345.50
Marc Brown	Partner & Managing Director	$1,415	27.9	39,478.50
Greg Magrisi	Partner & Managing Director	$1,250	35.9	44,875.00
Christopher Rubel	Partner	$1,225	80.1	98,122.50
Jerry Wang	Partner	$1,225	14.2	17,395.00
Johnny Lee	Partner	$1,225	73.9	90,527.50
Elizabeth S Kardos	Partner	$950	3.5	3,325.00
Ashutosh Panda	Director	$1,150	215.0	247,250.00
Joel Amico	Director	$1,150	142.7	164,105.00
Iain Nelson	Director	$1,120	41.7	46,704.00
Matthew D Gates	Director	$1,120	85.2	95,424.00
Ryan Komendowski	Director	$1,080	189.1	204,228.00
Matthew Root	Director	$1,000	105.7	105,700.00
Kaitlyn Sundt McClarren	Director	$715	4.6	3,289.00
Sam Lemack	Senior Vice President	$980	37.3	36,554.00
John Tutty	Senior Vice President	$950	108.6	103,170.00
Thomas G Prince	Senior Vice President	$950	86.5	82,175.00
Christopher Cuomo	Senior Vice President	$910	66.1	60,151.00
Jyoji Morimoto	Senior Vice President	$910	45.3	41,223.00
Susan Clark	Senior Vice President	$910	212.3	193,193.00
Chase Hood	Senior Vice President	$850	119.5	101,575.00

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Professional	Title	Rate	Hours	Fees
Brooke Filler	Senior Vice President	$605	2.4	1,452.00
Jennifer Braverman	Senior Vice President	$565	9.5	5,367.50
Lucas Lovatto	Vice President	$835	162.4	135,604.00
Lisa Marie Bonito	Vice President	$580	18.9	10,962.00
Francisco Carafi	Vice President	$445	15.5	6,897.50
Hugh Olohan	Analyst	$535	3.6	1,926.00
Total Hours and Fees for Professionals			**2,000.9**	**$ 2,075,481.00**
Less: 50% Travel Fees				(8,890.00)
Total Fees for Professionals				**$ 2,066,591.00**
Less: 20% Holdback				(413,318.20)
Total Fees for Professionals Less Holdback				**$ 1,653,272.80**

Average Billing Rate	**$ 1,032.83**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	41.8	$ 47,156.50
1.2	Meetings & Communication with UCC and Creditors	94.0	109,462.00
1.3	Prepare Committee Presentations	39.8	44,698.00
1.4	Meetings & Communication with Debtors	82.0	91,596.00
1.5	Mediation and Settlement Communications	41.5	46,443.50
1.6	DIP Financing and Cash Collateral	1.3	1,500.50
1.7	Liquidity and Cash Management	27.5	26,760.00
1.9	Business and Strategic Plan	803.6	799,469.50
1.10	Employee Compensation and Advisor Retention Matters	5.8	6,626.00
1.11	Financial and Other Diligence	136.8	145,923.00
1.12	Other Motions and Related Objections	12.7	15,680.00
1.13	Litigation Support & Investigations	89.1	93,646.00
1.14	Claims Analysis	104.8	101,254.00
1.15	Valuation and Solvency Analysis	383.6	410,092.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	21.1	22,230.00
1.18	Court Hearings and Status Conferences	18.4	21,752.50
1.19	Retention Application & Relationship Disclosures	21.3	15,331.50
1.20	Fee Applications & Fee Statements	24.5	17,774.00
1.22	Intercompany & Waterfall Analysis	37.3	40,306.00
1.31	Travel Time	14.0	8,890.00
	Total Hours and Fees By Matter Category Before Holdback	**2,000.9**	**$ 2,066,591.00**

Average Billing Rate $ 1,032.83

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Expense Category	Amount
Airfare	$ 1,214.39
Client Research	11,973.63
Ground Transportation	1,024.48
Lodging	3,000.00
Meals	169.67
Total Expenses	**$ 17,382.17**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this second monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from October 1, 2025 through October 31, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $2,066,591.00 and reimbursement of out-of-pocket expenses in the amount of $17,382.17 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $1,653,272.80 (80% of $2,066,591.00) and 100% of out-of-pocket expenses in the amount of $17,382.17 for a total amount of $1,670,654.97; and (iii) such other and further relief as this Court deems proper.

Dated: December 3, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Review open items issue and draft of workplan	0.7
10/03/2025	AP	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	CH	Review docket and update case milestone and hearing calendar	0.9
10/06/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JA	Draft of key items and workplan required to get to Confirmation hearing	1.1
10/06/2025	JL	Call with D. MacGreevey, K. McGlynn, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	LL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps.	0.5
10/06/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	SC	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/07/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/08/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
10/09/2025	AP	Participate in a call with A. Panda and C. Cuomo (AlixPartners) re: business plan process	0.4
10/13/2025	CC	Review: project deadlines and workstreams	0.4
10/13/2025	JA	Outline of key upcoming deliverables and build out work plan	1.1
10/14/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	CH	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	CC	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	CR	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	GM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	JA	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	JL	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	KBM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	MDG	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	RK	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	TGP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/21/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7

AlixPartners

ModivCare Inc., et al.
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/28/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/28/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
Total Professional Hours			**40.7**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.5	$	3,650.00
Kathryn B McGlynn	$1,415	3.0		4,245.00
Greg Magrisi	$1,250	3.0		3,750.00
Christopher Rubel	$1,225	2.5		3,062.50
Jerry Wang	$1,225	0.5		612.50
Johnny Lee	$1,225	3.0		3,675.00
Ashutosh Panda	$1,150	3.9		4,485.00
Joel Amico	$1,150	5.9		6,785.00
Matthew D Gates	$1,120	3.0		3,360.00
Ryan Komendowski	$1,080	3.0		3,240.00
Thomas G Prince	$950	3.0		2,850.00
Christopher Cuomo	$910	2.3		2,093.00
Susan Clark	$910	0.5		455.00
Chase Hood	$850	3.9		3,315.00
Lucas Lovatto	$835	0.5		417.50
Lisa Marie Bonito	$580	0.2		116.00
Total Professional Hours and Fees		**40.7**	**$**	**46,111.50**

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, ongoing workstreams, and next steps	0.8
10/02/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	DM	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JA	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JA	Prepare for meeting with Committee re cash performance to date and other case updates	0.6
10/02/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	KBM	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	MDG	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/03/2025	MDG	Call with R. Biel (W&C) re: unencumbered assets and diligence	0.2
10/04/2025	AP	Review business plan projections	0.1
10/04/2025	AP	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	DM	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	JL	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	MB	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	RK	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/08/2025	CH	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	CH	Correspondence with J. Yoo (W&C) re: SOFA diligence items	0.3
10/08/2025	CR	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	JA	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	MDG	Call with R. Beil, V. Sachdev, and D. Litz (W&C) re: lien challenges	0.5
10/08/2025	MDG	Draft answers to W&C re: lien challenge questions	0.6
10/08/2025	RK	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/09/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	CH	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	DM	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JA	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JA	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	JA	Pre-call with W&C before UCC meeting to discuss agenda	0.5
10/09/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	KBM	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	KBM	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	MDG	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	MDG	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/10/2025	MDG	Call with R. Beil (W&C) re: bank accounts	0.2
10/13/2025	CH	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	CR	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	JA	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	RK	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/14/2025	AP	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	AP	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	CH	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	CR	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	DM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	GM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	JA	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	JA	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	JT	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	JL	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	KBM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	MDG	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	MR	Analyze Moelis valuation materials.	1.4
10/14/2025	MR	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	MR	Prepare presentation materials for ModivCare valuation.	3.0
10/14/2025	RK	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	RK	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/15/2025	AP	Participate in a call with A. Panda, L. Lovatto (AlixPartners), D. Litz and others (W&C) re: Debtor operations and lien challenge.	0.5
10/15/2025	LL	Participate in a call with A. Panda, L. Lovatto (AlixPartners), D. Litz and others (W&C) re: Debtor operations and lien challenge.	0.5
10/16/2025	AP	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	CR	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore (W&C), D. MacGreevey, J. Lee, C. Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski re: weekly updates and strategies	0.5
10/16/2025	JA	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	JL	Call with D. MacGreevey, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	MDG	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	MDG	Correspondence with A. Zatz (W&C) re: claims	0.2
10/16/2025	RK	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/19/2025	AP	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	DM	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	JA	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	KBM	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	MDG	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	MR	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	RK	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/20/2025	CH	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	DM	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	DM	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	JA	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	JA	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	JT	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JT	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	MR	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	RK	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	RK	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/21/2025	AP	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CH	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	CH	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CR	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	CR	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CR	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	DM	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	DM	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	DM	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	GM	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JA	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JA	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JA	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	JT	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	JT	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JL	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	MDG	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	MDG	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	RK	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	RK	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/23/2025	AP	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	CH	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/23/2025	CR	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	DM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	DM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	GM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	JA	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	JA	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	JT	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	KBM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	KBM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	MDG	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	MDG	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/23/2025	RK	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	RK	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	TGP	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/28/2025	AP	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	CR	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	DM	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	JA	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4

AlixPartners

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Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/28/2025	JL	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	KBM	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	MDG	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	RK	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/29/2025	KBM	Review updates from Committee Counsel	0.4
10/30/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4

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Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/30/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	MDG	Correspondence with W&C re: lien challenge due diligence	0.4
10/30/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
Total Professional Hours			**93.1**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	10.4	$	15,184.00
Kathryn B McGlynn	$1,415	6.7		9,480.50
Marc Brown	$1,415	0.4		566.00
Greg Magrisi	$1,250	4.4		5,500.00
Christopher Rubel	$1,225	5.2		6,370.00
Jerry Wang	$1,225	1.3		1,592.50
Johnny Lee	$1,225	4.9		6,002.50
Ashutosh Panda	$1,150	8.1		9,315.00
Joel Amico	$1,150	13.2		15,180.00
Matthew D Gates	$1,120	9.9		11,088.00
Ryan Komendowski	$1,080	10.6		11,448.00
Matthew Root	$1,000	6.5		6,500.00
John Tutty	$950	4.4		4,180.00
Thomas G Prince	$950	0.2		190.00
Chase Hood	$850	6.4		5,440.00
Lucas Lovatto	$835	0.5		417.50
Total Professional Hours and Fees		**93.1**	**$**	**108,454.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Draft Committee materials re case update and cash flows	1.2
10/01/2025	MDG	Prepare for oral presentation to Committee	0.5
10/01/2025	TGP	Create slides summarizing analysis of the Debtors' liquidity through week ended September 21st	0.6
10/02/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.8
10/02/2025	KBM	Finalize weekly committee update presentation	0.6
10/02/2025	KBM	Prepare for weekly committee presentation	0.6
10/02/2025	MDG	Prepare for oral presentation to Committee on SOFA/SOAL analysis	0.8
10/02/2025	TGP	Update weekly presentation for call with Committee members based on internal comments	0.5
10/03/2025	JA	Draft of preliminary materials for Committee meeting	0.7
10/06/2025	TGP	Update weekly presentation slides re: the Debtors' liquidity and performance	0.8
10/08/2025	JA	Draft materials for UCC committee meeting	1.3
10/08/2025	MDG	Follow up on Committee materials re: ordinary course professionals motion	0.6
10/08/2025	MDG	Update Committee presentation materials	1.7
10/08/2025	TGP	Update weekly presentation slides for call with Committee members	0.6
10/09/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.7
10/09/2025	JA	Draft of slides and perform edits to Committee presentation	1.0
10/09/2025	KBM	Finalize weekly Committee update presentation	0.6
10/09/2025	MDG	Prepare for oral presentation to Committee meeting	0.5
10/10/2025	CC	Begin to frame thesis and support of alternative case in presentation format	2.6
10/10/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.5
10/13/2025	CH	Draft materials for upcoming Committee call re: revised DIP budget and liquidity	1.3
10/13/2025	CH	Draft updates to UCC materials re: revised budget to incorporate comments from J. Amico (AlixPartners)	0.6
10/13/2025	CC	Update presentation outline based on valuation and other industry news	1.4
10/14/2025	CH	Draft updates to Committee materials re: revised DIP budget to incorporate new materials from FTI	0.9
10/15/2025	CC	Review weekly presentation for edits	0.2
10/15/2025	DM	Review draft presentation to ModivCare UCC re: weekly updates	0.6
10/15/2025	JA	Prepare weekly committee update materials	1.3
10/16/2025	KBM	Review weekly update presentation to the Committee	0.7
10/17/2025	JA	Draft of slides for upcoming settlement discussions	1.0
10/20/2025	DM	Review draft presentation to ModivCare UCC re: settlement strategy	1.0
10/20/2025	JA	Draft of material outline and additional analysis required for UCC meeting	1.2
10/21/2025	JA	Prepare slides for Committee re upcoming settlement discussions	1.5
10/22/2025	JA	Prepare materials for Committee meeting	1.5
10/23/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates and settlement progression	0.7
10/23/2025	JA	Draft of Committee materials re settlement update and next steps	1.5
10/23/2025	KBM	Review changes to weekly Committee update presentation	0.2
10/29/2025	CH	Prepare shell presentation of claims analysis for upcoming Committee meeting	1.1
10/29/2025	DM	Review and provide comments to presentation to ModivCare UCC re: weekly updates	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	JA	Draft of update materials for meeting with Committee including various recovery scenarios and liquidity update	2.0
10/30/2025	CH	Prepare demonstratives and commentary for claims analysis presentation	2.2
10/30/2025	JA	Revisions to Committee materials based on comments received	0.5
10/30/2025	KBM	Review weekly presentation to the Committee	0.7
Total Professional Hours			**39.8**

AlixPartners

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Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.8	$	7,008.00
Kathryn B McGlynn	$1,415	3.4		4,811.00
Joel Amico	$1,150	14.7		16,905.00
Matthew D Gates	$1,120	4.1		4,592.00
Thomas G Prince	$950	2.5		2,375.00
Christopher Cuomo	$910	4.2		3,822.00
Chase Hood	$850	6.1		5,185.00
Total Professional Hours and Fees		**39.8**	**$**	**44,698.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	MDG	Correspondence with FTI re: diligence list	0.5
10/06/2025	JW	Review business plan evaluation	1.1
10/07/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	CH	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	JA	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	JL	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	KBM	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	LL	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	MDG	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	RK	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	SC	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	TGP	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/09/2025	AP	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	CH	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CC	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	CR	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	JA	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	JT	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	LL	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps.	0.7
10/09/2025	MDG	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	MDG	Correspondence with FTI re: datasite access for W&C team	0.3
10/09/2025	MR	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	RK	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	TGP	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/13/2025	MDG	Correspondence with Moelis re: dataroom additional participant	0.2
10/14/2025	AP	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	CH	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	CR	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JW	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JA	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JT	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JL	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	KBM	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	LL	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4

AlixPartners

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	MDG	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	RK	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	SC	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/16/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	AP	Participate in a call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	AP	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	CH	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	CR	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	CR	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	DM	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	DM	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	JA	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JA	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	JA	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	JT	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JT	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	JL	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JL	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	JL	Participate in a call with A. Panda, G. Magrisi, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	KBM	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	MDG	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	RK	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	RK	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	RK	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JA	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	RK	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/21/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	CH	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	JA	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JL	Call with K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	KBM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	MDG	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	RK	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	AP	Participate in a call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	CH	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	CR	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	JA	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	JT	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	KBM	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	MDG	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	RK	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/27/2025	DM	Emails with J. Shapiro (FTI) and J. Amico re: diligence related to projected ModivCare LC's	0.3
10/28/2025	AP	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	CH	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	GM	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	JA	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	MDG	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	RK	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/30/2025	AP	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	JA	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	JT	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	MDG	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	RK	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
Total Professional Hours			**82.0**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.4	$	6,424.00
Kathryn B McGlynn	$1,415	2.3		3,254.50
Greg Magrisi	$1,250	4.4		5,500.00
Christopher Rubel	$1,225	3.9		4,777.50
Jerry Wang	$1,225	3.4		4,165.00
Johnny Lee	$1,225	8.0		9,800.00
Ashutosh Panda	$1,150	9.7		11,155.00
Joel Amico	$1,150	9.7		11,155.00
Matthew D Gates	$1,120	4.7		5,264.00
Ryan Komendowski	$1,080	9.7		10,476.00
Matthew Root	$1,000	0.7		700.00
John Tutty	$950	4.2		3,990.00
Thomas G Prince	$950	1.5		1,425.00
Christopher Cuomo	$910	4.7		4,277.00
Susan Clark	$910	3.3		3,003.00
Chase Hood	$850	3.4		2,890.00
Lucas Lovatto	$835	4.0		3,340.00
Total Professional Hours and Fees		**82.0**	**$**	**91,596.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JT	Develop summary of hurdle analysis for presentation	2.8
10/21/2025	CR	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	JA	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	JT	Develop slides to illustrate settlement proposals in advance of UCC meeting	2.7
10/21/2025	JT	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	RK	Recreation of company waterfall analysis for settlement meeting discussions.	2.8
10/21/2025	RK	Update to analysis for company valuation slides in advance of committee meeting	1.7
10/21/2025	RK	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/22/2025	CR	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	CR	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	DM	Attend in person ModivCare settlement meetings with Debtors, Lenders and UCC professionals and principals	5.5
10/22/2025	DM	Review materials presented by Debtors at ModivCare settlement meetings	0.8
10/22/2025	JA	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	JA	In person settlement meetings Latham NYC office	5.0
10/22/2025	JA	Working session with J. Amico and J. Tutty (AlixPartners) re: side-by-side comparison of the settlement proposals	1.5
10/22/2025	JA	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	JT	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	JT	Refine side-by-side comparison of settlement offers and proposals	2.2
10/22/2025	JT	Working session with J. Amico and J. Tutty (AlixPartners) re: side-by-side comparison of the settlement proposals	1.5
10/22/2025	JT	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	RK	Attend settlement discussions with ModivCare (and advisors), 1L (and advisors), and UCC (and advisors).	5.0
10/22/2025	RK	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	RK	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/29/2025	TGP	Analyze settlement proposals	1.6
Total Professional Hours			**41.5**

AlixPartners

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Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.3	$	9,198.00
Christopher Rubel	$1,225	2.1		2,572.50
Joel Amico	$1,150	8.6		9,890.00
Ryan Komendowski	$1,080	11.6		12,528.00
John Tutty	$950	11.3		10,735.00
Thomas G Prince	$950	1.6		1,520.00
Total Professional Hours and Fees		**41.5**	**$**	**46,443.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/05/2025	CH	Analyze prepetition vendor payments	0.6
10/10/2025	KBM	Review updated DIP budget	0.7
Total Professional Hours			**1.3**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	0.7	$	990.50
Chase Hood	$850	0.6		510.00
Total Professional Hours and Fees		**1.3**	**$**	**1,500.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	CH	Review liquidity and variance reporting package for week ended 9/21	0.9
10/01/2025	TGP	Analyze the Debtors' actual performance versus budget through week ended September 21st	1.6
10/02/2025	KBM	Review weekly liquidity update analyses	0.6
10/03/2025	JA	Review liquidity and cash reporting results	0.5
10/06/2025	CH	Review variance reporting package for week ended 9/28	0.7
10/06/2025	JA	Analyze latest variance report and draft liquidity diligence questions	0.7
10/06/2025	TGP	Analyze the Debtors' variance report for the period ended September 28th	0.7
10/06/2025	TGP	Draft questions for the Debtors' re: the variance report for the period ended September 28th	0.4
10/09/2025	KBM	Review weekly liquidity analysis update for Committee	0.4
10/10/2025	CH	Analyze revised DIP budget and related assumptions	1.7
10/10/2025	JA	Analyze revised DIP forecast	0.7
10/13/2025	CH	Draft analysis re: bridge between beginning and ending cash in revised DIP budget	1.6
10/13/2025	CH	Draft bridge analysis and related commentary re: overlapping period between filed and revised DIP budgets	1.8
10/13/2025	CH	Draft comparative analysis re: forecasted and actual liquidity	1.4
10/13/2025	CH	Draft diligence questions for FTI re: revised DIP budget and related assumptions	0.7
10/13/2025	JA	Analyze revised 13 week forecast, reconcile to prior and prepare diligence questions	1.2
10/14/2025	CH	Analyze liquidity bridge analysis between filed and revised DIP budget prepared by Debtors	0.8
10/14/2025	CH	Analyze revised emergence cash sources and uses	0.6
10/14/2025	JA	Review revised cash forecast and reconcile changes to prior version	1.3
10/17/2025	CH	Review variance reporting package for week ended 10/12	0.8
10/20/2025	CH	Draft analysis and demonstratives for weekly liquidity reporting	1.3
10/20/2025	CH	Draft diligence questions for FTI re: weekly liquidity reporting	0.3
10/20/2025	JA	Analyze cash scenarios under various scenarios based on latest Debtor's cash reporting	0.5
10/24/2025	CH	Review variance reporting package for week ended 10/19	0.8
10/24/2025	JA	Review various adjustments at effective date and liquidity status	0.6
10/27/2025	CH	Draft analysis and demonstratives for weekly liquidity reporting for upcoming Committee meeting	1.4
10/27/2025	JA	Review latest cash variance reporting, analyze variance and reconcile to original budget	0.7
10/28/2025	JA	Analyze certain emergence liquidity items and scenarios	1.1
10/29/2025	CH	Review surety bond and letter of credit supporting detail	0.5
10/29/2025	JA	Analyze variance reports and determine impact on go forward liquidity	0.5
10/31/2025	JA	Analyze certain contractual surety and LC requirements	0.7
Total Professional Hours			**27.5**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	1.0	$	1,415.00
Joel Amico	$1,150	8.5		9,775.00
Thomas G Prince	$950	2.7		2,565.00
Chase Hood	$850	15.3		13,005.00
Total Professional Hours and Fees		**27.5**	**$**	**26,760.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	AP	Analyze customer contract attrition and revenue impacts for RPM business for the top 20 contracts	2.8
10/01/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
10/01/2025	AP	Update Information requests to discuss with Debtor's financial advisor in support of FY26-30 business plan	2.9
10/01/2025	JL	Review data documents and received files and add follow up request items or status inquiry on outstanding items for business plan /financial projections review	1.4
10/01/2025	LL	Analyze service expense as % of revenue data for NEMT, PCS and RPM/Higi to develop hypotheses on performance improvement levers	1.8
10/01/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.9
10/01/2025	SC	Create slides for initial view point on G&A costs for business plan workstream	2.1
10/01/2025	SC	Gather and analyze financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.4
10/01/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	1.6
10/02/2025	AP	Prepare outline of draft business plan review report re: Debtor's business plan projections filed on 9/23	2.7
10/02/2025	AP	Review cost details and unit cost economics for the NEMT business segment	2.5
10/02/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.7
10/02/2025	LL	Conduct initial assessment of segment-level financials and cost allocations; compared plan margins to historical performance and peer benchmarks.	2.8
10/02/2025	LL	Prepare interim report and status updates with market and company research preliminary findings.	0.6
10/02/2025	LL	Research US Home Personal Care Services market to understand historical performance and growth trends for comparison with management's forecast	1.8
10/02/2025	LL	Review management’s consolidated business plan and supporting model to identify key assumptions requiring validation; aligned analytical priorities with Managing Director	2.8
10/02/2025	SC	Create slides for initial view point at business level for discussions with UCC.	2.8
10/02/2025	SC	Develop slides for initial view point on G&A costs for business plan workstream	2.6
10/02/2025	SC	Gather and analyze financial data from publicly available sources and provided by Debtor to create model for business plan workstream	2.4
10/02/2025	SC	Review financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.4
10/02/2025	TGP	Analyze documents uploaded to data room related to the Debtors' business plan	2.6
10/03/2025	AP	Prepare status dashboard for Information requests to discuss with Debtor's financial advisor in support of FY26-30 business plan	3.1
10/03/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.4
10/03/2025	AP	Review new data and files received from Debtor's advisors re: Debtor's business plan projections filed on 9/23	2.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	GM	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	JW	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	LL	Analyze September 2025 YTD third-party spend data to identify spending trends, cost drivers, and potential opportunities for vendor optimization	2.4
10/03/2025	LL	Analyze segment-level P&L and EBITDA bridge to evaluate the validity of management's underlying cost assumptions	1.8
10/03/2025	LL	Develop inferences from historical and trend data for PCS, evaluating revenue, service expense, G&A, Adjusted EBITDA, hours billed, wages, and revenue per hour to identify performance drivers and financial patterns	2.4
10/03/2025	LL	Supported sensitivity analysis of NEMT and PCS service expense based on revised EBITDA scenarios	1.4
10/03/2025	SC	Analyze employee census data provided by Debtors to get functional view of headcount costs for business plan workstream	2.9
10/03/2025	SC	Create slides on initial viewpoint of financials and headcount for discussion with UCC.	2.1
10/03/2025	SC	Develop slides for initial view point on G&A costs for business plan workstream	1.3
10/03/2025	SC	Review financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.8
10/06/2025	AP	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.6
10/06/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.6
10/06/2025	AP	Update information requests and status dashboard to discuss with Debtor's financial advisor in support of FY26-30 business plan	1.1
10/06/2025	FC	Research ModivCare and subsidiaries public data from 10-k and social networks to define public employment and compensation detail	1.3
10/06/2025	FC	Evaluate data and summarize comparable employment metrics	0.2
10/06/2025	FC	Analyze ModivCare S&M and G&A profiles from public social network	1.8
10/06/2025	FC	Analyze ModivCare COGS and R&D profiles from public social network.	1.9
10/06/2025	FC	Run code to Merge scraped data.	0.3
10/06/2025	GM	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	JW	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	LL	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	LL	Conduct assessment of indirect-spend categories targeted for tail-spend controller program; identified baseline addressable spend and expected savings rates.	2.5
10/06/2025	LL	Perform detailed variance analysis on NEMT ambulatorial segment, comparing actuals vs. forecast and identifying drivers of underperformance.	2.0

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10/06/2025	LL	Updated vendor categorization according to cost center, business unit and expense type across fragmented data received	2.5
10/06/2025	SC	Analyze financial and census data for hypothesis creation as part of business plan workstream.	2.8
10/06/2025	SC	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	SC	Create support slides for hypothesis developed for G&A functions	2.9
10/06/2025	SC	Develop savings hypothesis for G&A functions as part of business plan workstream.	1.2
10/06/2025	SC	Review slides for hypothesis developed for G&A functions	2.6
10/06/2025	TGP	Analyze the Debtors' historical financials	2.3
10/06/2025	TGP	Analyze the Debtors' projections	2.9
10/07/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.8
10/07/2025	AP	Review cost details and unit cost economics for the NEMT business segment	2.7
10/07/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
10/07/2025	FC	Anonymize company data, translate job titles, and process headcount with ML model.	0.8
10/07/2025	FC	Harmonize and clean collected data removing duplicates and mismatched companies	1.1
10/07/2025	FC	Map employees seniority, geocode data, and group profiles by subsidiary.	2.1
10/07/2025	LL	Analyze supplier-rationalization pipeline; flagged categories with overlapping vendors and limited sourcing leverage.	2.8
10/07/2025	LL	Review 2022-2024 10K and 10Q documents re: service expense composition for each business unit and trends.	1.7
10/07/2025	LL	Review supplier data supporting tail-spend program; identified duplicate vendors and low-value POs suitable for consolidation	2.2
10/07/2025	LL	Updated data request after alignment and clarification with Debtor advisors	0.5
10/07/2025	SC	Create support slides for hypothesis developed for G&A functions	2.8
10/07/2025	SC	Develop savings hypothesis for G&A functions as part of business plan workstream.	2.6
10/07/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.9
10/07/2025	SC	Review slides for hypothesis developed for G&A functions	1.8
10/07/2025	TGP	Analyze the Debtors' board materials with respect to budgets and projections	2.4
10/07/2025	TGP	Analyze the Debtors' projections over time and identify changes for reconciliation	2.6
10/08/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.8
10/08/2025	AP	Review cost details and unit cost economics for the PCS business segment	2.7
10/08/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.9
10/08/2025	CC	Coordinate responsibilities related to business plan	0.4
10/08/2025	FC	Analyze headcount data comparables	1.0

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10/08/2025	FC	Update classification dataset and generate headcount landscape report.	2.9
10/08/2025	FC	Analyze various compensation data for public sources	0.6
10/08/2025	FC	Integrate labor cost data into the final report.	1.5
10/08/2025	JL	Analyze implied financial performance metrics (margins of business segments, historic trend, and potential impact of united healthcare change to business.	1.2
10/08/2025	JL	Provide comments to team on potential areas to address and priorities for business plan/projections review	0.4
10/08/2025	LL	Analyze NEMT contact-center staffing and fully loaded cost of internal HC vs. contracted BPO operators	1.4
10/08/2025	LL	Develop savings bridge linking tail-spend reduction to forecast SG&A improvements.	2.8
10/08/2025	LL	Research personal care, administrative and call center job descriptions on Debtor's website for job function mapping.	2.0
10/08/2025	LL	Review employee census re: service expense organizations to assess baseline	1.8
10/08/2025	SC	Analyze financial and census data to create G&A function hypotheses as part of business plan workstream.	2.7
10/08/2025	SC	Create support slides for hypothesis developed for G&A functions	2.8
10/08/2025	SC	Develop labor model to analyze census data and create hypotheses for G&A functions	2.3
10/08/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.2
10/08/2025	TGP	Analyze the Debtors' historical financials and prepare supporting slides	2.7
10/08/2025	TGP	Analyze the Debtors' projections over time and identify key drivers	2.4
10/09/2025	AP	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.4
10/09/2025	AP	Review cost details and unit cost economics for the RPM/Higi business segment	2.1
10/09/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.5
10/09/2025	CC	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	CC	Develop question list for Modivcare re: key drivers	2.2
10/09/2025	CC	Participate in a call with A. Panda and C. Cuomo (AlixPartners) re: business plan process	0.4
10/09/2025	CC	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: review of uptier and EBITDA outlook	0.3
10/09/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: business plan responsibilities	0.5
10/09/2025	CC	Review business plan model drivers and key inputs	2.8
10/09/2025	CC	Review lender presentation, earnings transcripts, and public documents for operating history	2.9
10/09/2025	JL	Add follow up items in tracker for team to address with FTI and Moelis re: the business plan/projections	0.4

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10/09/2025	JL	Call with A. Panda, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	JL	Provide comments on analysis for projections and identified savings	0.6
10/09/2025	LL	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps.	0.7
10/09/2025	LL	Evaluate potential cost improvement initiatives for NEMT and PCS contact centers; quantified labor-arbitrage savings and one-time transition costs.	2.2
10/09/2025	LL	Review outsourced labor contracts to compare scope, terms and rates across suppliers	1.4
10/09/2025	LL	Review top outsourced labor vendor contracts re: terms, rates, and structure.	2.0
10/09/2025	LL	Summarize top outsourced labor vendor contracts to compare terms, rates, services provided and contract structures.	1.0
10/09/2025	RK	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: review of uptier and EBITDA outlook	0.3
10/09/2025	SC	Analyze census data and refine data to create baseline as part of business plan workstream.	2.0
10/09/2025	SC	Create labor model based on census data as part of business plan workstream.	2.3
10/09/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.5
10/09/2025	SC	Review labor model based on census data, and research metrics to add as part of business plan workstream.	2.7
10/09/2025	SC	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps.	0.7
10/09/2025	TGP	Analyze changes in operating expenses over time	2.6
10/09/2025	TGP	Analyze the labor related expenses in projection model	2.8
10/09/2025	TGP	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: business plan responsibilities	0.5
10/10/2025	AP	Continue to prepare NEMT Customer Request for Proposal Summary to show the Debtor assumption on request for proposal outcome	2.5
10/10/2025	AP	Prepare NEMT Customer Request for Proposal summary to show key request for proposal milestones, annual contract value, 2025 and 2025 forecast revenue	2.9
10/10/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.6
10/10/2025	CC	Respond to D. MacGreevey (AlixPartners) re: contract losses	0.8
10/10/2025	JL	Review business plan and projections	0.5
10/10/2025	JL	Provide comments on outstanding requests and priority of requests along with additional areas to address	0.3
10/10/2025	LL	Analyze September 2025 LTM third party spend data re: potential cost improvement opportunities	3.0
10/10/2025	LL	Prepare interim materials summarizing contact-center improvement levers and impact on cost structure post-implementation.	2.4
10/10/2025	LL	Research automation-driven call-deflection potential; estimated reduction in inbound volume and resulting FTE requirement changes.	2.6

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10/10/2025	SC	Refine labor model to develop savings hypotheses as part of business plan workstream.	2.6
10/10/2025	TGP	Analyze the Debtors' historical financials	2.9
10/12/2025	CC	Assess competitor revenue outlook based on proxy statement	1.2
10/12/2025	CC	Review financial model assumptions re: key performance indicators	0.4
10/12/2025	CC	Review historical 10-Ks and filings for history, exposure, revenue trends, contract types	0.9
10/12/2025	CC	Review investor deck from May 2024 for business outlook	1.1
10/12/2025	CC	Review Moelis valuation for perspective on comparables and trends	0.7
10/13/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	2.6
10/13/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/13/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
10/13/2025	CC	Continue to review Moelis valuation for perspective on health care trends embedded into forecasts	0.9
10/13/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: planning on financial model	0.5
10/13/2025	CC	Review competitor transcripts for perspective on home care industry	0.4
10/13/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JL	Prepare questions and discussion items for C. Shandler meeting	0.8
10/13/2025	JL	Prepare questions and discussion items for meeting with K. Shepard	1.3
10/13/2025	JL	Prepare questions and discussion items for meeting with S. Kern from Debtors	1.8
10/13/2025	LL	Analyze field operations structure to identify organizational design improvement initiatives.	1.8
10/13/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	LL	Prepare organizational effectiveness model for field operations estimating potential savings.	2.7

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10/13/2025	LL	Prepare interview questions re: NEMT business and projections for informal call with Ken Shepard (10/16).	2.5
10/13/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.6
10/13/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.7
10/13/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	SC	Refine labor model to develop savings hypotheses as part of business plan workstream.	2.6
10/13/2025	SC	Review materials for support of G&A workstream for business plan workstream, identifying cost savings opportunities, analyzing census materials, researching on health care industry and trends,	1.9
10/13/2025	TGP	Create model to analyze the Debtors' projections by business unit	2.7
10/13/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: planning on financial model	0.5
10/13/2025	TGP	Update model to analyze the Debtors' projections by business unit based on analysis of the Debtors' costs	1.9
10/14/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	1.9
10/14/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.6
10/14/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
10/14/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: initial review of financial model	0.3
10/14/2025	CC	Review ModivCare transcripts for historical perspective	1.4
10/14/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8

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10/14/2025	JL	Review model and files received from debtors for business plan/projections and note follow up requests needed or confirmation of understanding	1.5
10/14/2025	JL	Update tracker for this week's meetings with Debtor for business plan and projection items	1.3
10/14/2025	LL	Conduct research on state-by-state Medicaid PCS reimbursement structures; compiled rate schedules and recent CMS updates impacting core markets.	2.8
10/14/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	LL	Perform multivariate analysis quantifying correlation between state reimbursement trends and ModivCare revenue variance	3.0
10/14/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.6
10/14/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	1.3
10/14/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	2.2
10/14/2025	SC	Review materials of support for additional cost opportunity within G&A for business plan workstream	2.9
10/14/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: initial review of financial model	0.3
10/15/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	2.6
10/15/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.9
10/15/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.5
10/15/2025	CC	Begin to model framework for alternative case	1.2
10/15/2025	CC	Update financial model re: checks and income statement	1.6
10/15/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	CC	Research and send messages to A. Panda of AlixPartners re: margin outlook	0.4
10/15/2025	CC	Review management meeting questions in advance of meetings	0.6
10/15/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4

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10/15/2025	JL	Review files received from debtors on financial projections/ assumptions and notating additional requests	1.3
10/15/2025	JL	Review, edit and add items to questions and discussion items with debtors for business plan items and files received	1.4
10/15/2025	LL	Analyze cost and operations center labor cost structure to assess potential opportunities for cost improvement in the NEMT business unit.	2.5
10/15/2025	LL	Analyze labor and non-labor Cost of Goods Sold (COGS) structure based on new data provided by Debtor to refine working hypotheses	2.0
10/15/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	LL	Review state procurement and managed-care contract data to identify rate caps and recent competitive rebids affecting pricing assumptions	2.6
10/15/2025	SC	Analyze data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	1.9
10/15/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.9
10/15/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	2.5
10/15/2025	SC	Identify additional cost opportunities within G&A for business plan workstream	3.0
10/15/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/16/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	0.8
10/16/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.1
10/16/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
10/16/2025	CC	Begin to build out model checks across income statement	2.9
10/16/2025	CC	Continue to build out cases summary tab in financial model	3.0
10/16/2025	LL	Assess NEMT contact center call volume and cost per call and recalculate annual savings.	1.8
10/16/2025	LL	Research metrics (potential eligibility, average savings, industry practices) for rideshare as an alternative to traditional NEMT transportation for low-acuity and outpatient cases.	2.0
10/16/2025	LL	Review customer contracts to pinpoint specific contact center operations terms and service levels.	2.1
10/16/2025	SC	Analyze census data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	2.4
10/16/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	2.2
10/16/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	1.8
10/16/2025	SC	Review materials of support for additional cost opportunity within G&A for business plan workstream	2.1
10/17/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	1.3
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.7
10/17/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
10/17/2025	CC	Formulate questions in advance of call with C. Shandler of FTI	1.3
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	JL	Draft diligence questions for management re business plan	0.5
10/17/2025	LL	Analyze transport provider data to assess potential opportunities for cost improvement in the NEMT business unit.	2.5
10/17/2025	LL	Coordinate with valuation workstream to ensure revised operating projections flow through to enterprise-value sensitivity model.	1.8
10/17/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	LL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	LL	Update executive-summary slides highlighting cumulative transformation savings.	1.3
10/17/2025	SC	Analyze census data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	2.4
10/17/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	2.1
10/17/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/19/2025	SC	Develop additional hypotheses for cost opportunity within G&A for business plan workstream	2.8
10/19/2025	SC	Research public company costs to support G&A workstream for business plan workstream	2.4
10/19/2025	SC	Review labor model and create materials to support hypotheses as part of business plan workstream.	2.9
10/20/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.1
10/20/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.6
10/20/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.1
10/20/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
10/20/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	CC	Review latest due diligence information download in data room re forecasts	0.6
10/20/2025	CC	Review ModivCare financials for historical perspective	0.7
10/20/2025	CC	Update ModivCare financial model for summary statistics	1.8
10/20/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	IN	Draft initial cost management hypotheses for third-party spend	1.2
10/20/2025	IN	Draft initial hypotheses for internal/ external labor cost reductions	1.8
10/20/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	IN	Review data room management presentations	0.6
10/20/2025	IN	Review documents in data room	1.8
10/20/2025	IN	Update Excel file for third-party spend	1.2
10/20/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	JL	Review and update business plan analysis	1.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	LL	Analyze fragmented tail vendors to identify addressable vs. non-addressable spend for a potential savings initiative.	2.0
10/20/2025	LL	Analyze third party spend data to identify categories, top vendors and potential cost improvement opportunities.	3.0
10/20/2025	LL	Map branch operations and management HC to assess labor baseline and potential organizational improvement opportunities	1.4
10/20/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	SC	Analyze third party costs associated with G&A workstream for business plan workstream	1.5
10/20/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.6
10/20/2025	SC	Develop hypotheses for third party costs associated with G&A workstream for business plan workstream	1.8
10/20/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/20/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	SC	Revise hypotheses for cost opportunity within G&A for business plan workstream	2.7
10/20/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/21/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.3
10/21/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	1.4
10/21/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.6
10/21/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.7
10/21/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	GM	Conduct Business Plan and CapEx analysis	0.5
10/21/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	IN	Categorize CapEx projects to model savings	1.4
10/21/2025	IN	Create PowerPoint materials for CapEx categorization	2.2

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10/21/2025	IN	Participate in a call with I. Nelson, S. Clark (AlixPartners) re: Technology Labor Spend	0.8
10/21/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	IN	Update CapEx cost optimization model	1.4
10/21/2025	IN	Update PowerPoint materials for CapEx with commentary	1.6
10/21/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	JL	Review and provide edits to revised business plan expert report	2.2
10/21/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review.	1.6
10/21/2025	LL	Analyze outsourced labor contracts for customer support to determine scope, contract structure, rates and other terms to identify potential overlap and cost improvement opportunities.	1.8
10/21/2025	LL	Analyze role titles, compensation and seniority levels to assess organizational design improvement opportunities	3.0
10/21/2025	LL	Map contact center roles for NEMT and PCS, both internal staff and contract labor, to assess total spend baseline	1.6
10/21/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review.	1.6
10/21/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/21/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	SC	Participate in a call with I. Nelson, S. Clark (AlixPartners) re: Technology Labor Spend	0.8
10/21/2025	SC	Review materials for support of G&A workstream for business plan workstream	2.5
10/21/2025	SC	Revise hypotheses for cost opportunity within G&A for business plan workstream	2.7
10/21/2025	TGP	Analyze the Debtors' financial projections	2.1
10/21/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/22/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.9
10/22/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/22/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.4

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10/22/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
10/22/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	GM	Conduct Business Plan and CapEx analysis	2.0
10/22/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	IN	Create PowerPoint materials for third-party spend savings	1.4
10/22/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	IN	Develop savings model in excel for third party spend	1.9
10/22/2025	IN	Define vendor classification and tail spend model	1.8
10/22/2025	IN	Update third party spend savings levers	1.7
10/22/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	JL	Provide comments to business plan analysis	2.0
10/22/2025	JL	Review projection model and quantify proposed changes	1.8
10/22/2025	LL	Analyze debtor's Mobility forecast to assess trip mix-shift trends by trip category, contract and payment structure.	3.0
10/22/2025	LL	Analyze rideshare spend data (TTM) to assess spend efficiency and potential to address cancellation fees spend.	2.5
10/22/2025	LL	Compared forecasted trip data with actuals for commercial transport providers, rideshare, mileage reimbursement and mass transit to understand rideshare adoption momentum.	1.7
10/22/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend.	0.8
10/22/2025	TGP	Analyze the Debtors' projected costs	1.2
10/23/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.3
10/23/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.7
10/23/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/23/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.8
10/23/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	DM	Review draft UHC contract comps for ModivCare contract termination 9019	0.6
10/23/2025	GM	Conduct Business Plan and CapEx analysis	2.0
10/23/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	IN	Define offshoring limits for labor model cost optimization	1.4
10/23/2025	IN	Develop labor model cost optimization role classification in Excel	1.3
10/23/2025	IN	Draft labor optimization PowerPoint slide	1.1

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10/23/2025	IN	Labor model cost optimization model development	1.9
10/23/2025	IN	Update CapEx optimization PowerPoint slide	0.6
10/23/2025	IN	Update CapEx spend model assumptions in Excel	1.2
10/23/2025	IN	Update labor cost optimization PowerPoint slide	1.0
10/23/2025	JL	Provide comments to business plan analysis	1.4
10/23/2025	JL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	LL	Analyze PCS COGS and Opex GL data from 2023 to 2025 to assess profitability and staffing expenses by state.	3.0
10/23/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Levitt, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck.	0.4
10/23/2025	LL	Refine cost improvement levers for NEMT and PCS contact center operations, run-rate benefits and potential implementation roadmap.	2.8
10/23/2025	LL	Research cost to achieve re: service expense cost improvement initiatives.	1.8
10/23/2025	SC	Create presentation materials for G&A workstream in business plan review	2.4
10/23/2025	SC	Evaluation of potential cost savings opportunities	1.9
10/23/2025	SC	Analysis of census materials for business plan review	2.3
10/23/2025	SC	Research on health care industry trends	2.5
10/23/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/23/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	SC	Review materials in support of cost savings opportunities for business plan workstream	1.2
10/23/2025	TGP	Analyze the Debtors' projected revenue	0.8
10/24/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
10/24/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	1.9
10/24/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	AP	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.1
10/24/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.9
10/24/2025	CH	Review draft business plan materials	1.1
10/24/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	CC	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	DM	Review and provide comments on draft Magrisi expert report re: ModivCare business plan	4.3

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10/24/2025	GM	Conduct Business Plan and CapEx analysis	4.0
10/24/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	GM	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	IN	Finalize Labor cost optimization PowerPoint materials	1.8
10/24/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	IN	Update CapEx optimization model	1.2
10/24/2025	IN	Update CapEx optimization PowerPoint slide	0.3
10/24/2025	IN	Update labor cost optimization model in Excel	1.7
10/24/2025	IN	Update labor optimization model in Excel	1.9
10/24/2025	JW	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	JA	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	JA	Review and provide comments on business plan report	1.0
10/24/2025	JL	Analyze EBITDA upside calculation	1.3
10/24/2025	JL	Provide comments on business plan report	1.8
10/24/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	JL	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	LL	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report.	0.7
10/24/2025	LL	Refine contact center improvement opportunities based on expert interviews applied to ModivCare specific case.	1.5
10/24/2025	LL	Research PCS reimbursement rates from 2022 to 2024 for PA, NY, NJ, MA, CT, WV and FL to compare with ModivCare rates and trends.	2.8
10/24/2025	LL	Update report with baseline, findings, opportunity sizing, cost to achieve and timeline for run-rate savings.	2.8
10/24/2025	MDG	Review business plan report	0.9
10/24/2025	MR	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report.	0.7
10/24/2025	RK	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/24/2025	RK	Review draft business plan report.	2.6
10/24/2025	SC	Create presentation materials to quantify G&A savings	2.4
10/24/2025	SC	Review of cost savings opportunities and prioritize based on impact ability	2.6
10/24/2025	SC	Review of health care trends vs. Debtors proposed budget	2.8
10/24/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.9
10/24/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	SC	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	SC	Review materials in support of cost savings opportunities for business plan workstream	0.7
10/25/2025	GM	Conduct Business Plan and CapEx analysis	0.5
10/26/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.5
10/26/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.4
10/26/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/26/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.6
10/26/2025	GM	Conduct Business Plan and CapEx analysis	0.7
10/26/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.7
10/26/2025	SC	Update slides for support of G&A workstream for business plan workstream	2.5
10/27/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.2
10/27/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/27/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.1
10/27/2025	AP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.1
10/27/2025	CC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	GM	Review Business Plan and CapEx analysis and materials	0.5
10/27/2025	IN	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	JA	Review and provide comments on business plan report	1.0
10/27/2025	JL	Participate in a call with A. Panda, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	JL	Perform research and analysis for inclusion in business plan/ projections report	2.2
10/27/2025	KBM	Review business plan updates	0.6
10/27/2025	LL	Assessed assumptions underlying rideshare adoption ramp; compared utilization rates forecast vs. actuals for 2025 Q1 and Q2.	2.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	LL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	LL	Review management analysis of transportation provider mix-shift; modeled financial impact of incremental Uber/Lyft penetration on cost-per-trip and gross margin.	2.0
10/27/2025	LL	Updated analysis, models and reports to account for revised total labor burden rate as supplied by Debtor and determine revised cost improvement opportunities.	3.0
10/27/2025	SC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	SC	Research employee compensation benchmarks and precedent in Chapter 11 companies.	2.1
10/27/2025	SC	Revise content for G&A workstream as part of business plan work	2.9
10/28/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.9
10/28/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.5
10/28/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.6
10/28/2025	AP	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.6
10/28/2025	CC	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	IN	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	JL	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	LL	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	LL	Prepare scenario model quantifying savings from transportation provider mix-shift under varying trip volumes and savings per trip estimates; summarized implications for base-case EBITDA.	2.5
10/28/2025	LL	Research Medicaid reimbursement rates and trends (2025-2028) for non-medical personal care services in CT, FL, MA, NJ, NY, PA and WV.	2.5
10/28/2025	LL	Review management's segment updates to evaluate service-level implications of increased Uber/Lyft usage; coordinated with operations SME.	2.7
10/28/2025	SC	Develop materials for expert report for G&A as part of business plan workstream	2.4
10/28/2025	SC	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	SC	Research precedent on instances of companies changing employee comp while under Chapter 11	2.7
10/28/2025	SC	Revise content based on updated information from Debtor for business plan workstream	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/28/2025	SC	Update labor model on new information provided by Debtor for business plan workstream	1.8
10/28/2025	TGP	Analyze the Debtors' business plan projections under various cost assumptions	1.4
10/28/2025	TGP	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/29/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.8
10/29/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.7
10/29/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/29/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	AP	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
10/29/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	GM	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	IN	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	JL	Follow up on outstanding items for business plan report and incorporate	1.8
10/29/2025	JL	Participate in a call with G. Magrisi, A. Panda, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	LL	Create model to compare PCS reimbursement rates according to Debtor's forecast, historical performance and market trends.	2.5
10/29/2025	LL	Draft memo summarizing organizational-design recommendations and quantified savings for inclusion in business-plan diligence report.	2.8
10/29/2025	LL	Integrate service expense initiatives into unified business-plan financial model; ensured consistency of savings phasing and one-time costs.ore sending to W&C for review.	2.2
10/29/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	LL	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	SC	Review content to ensure all values tie and align to updated information from Debtor for business plan workstream	2.2
10/29/2025	SC	Revise content based on updated information from Debtor for business plan workstream	2.9

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Re: Business and Strategic Plan
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	SC	Update content based on new information from Debtor for business plan workstream	2.7
10/29/2025	TGP	Analyze the Debtors' business plan projections under various revenue assumptions	1.1
10/29/2025	TGP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/30/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.2
10/30/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.2
10/30/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/30/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
10/30/2025	CC	Revise financial model to reflect business plan adjustments	1.4
10/30/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	GM	Review Business Plan and CapEx analysis and materials	1.0
10/30/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	JA	Review business plan evaluation materials and reconcile scenarios to Company plan	1.0
10/30/2025	JL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	SC	Prepare back-up materials, re: G&A labor model and savings	2.6
10/30/2025	SC	Review content for expert report for business plan workstream	2.3
10/30/2025	TGP	Analyze the Debtors' business plan projections under various cost assumptions	1.8
10/31/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.7
10/31/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/31/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/31/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.1
10/31/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	GM	Review Business Plan and CapEx analysis and materials	1.0
10/31/2025	GM	Participate in a call with G. Magrisi, J. Lee (AlixPartners) re: edits to valuation reports	0.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/31/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	IN	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	JA	Provide comments on business plan expert report	0.8
10/31/2025	JL	Participate in a call with G. Magrisi, J. Lee (AlixPartners) re: edits to valuation reports	0.1
10/31/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	JL	Research and analysis on revenue items for business plan	1.5
10/31/2025	JL	Provide edits on business plan expert report	1.6
10/31/2025	KBM	Review updates related to draft business plan report	0.6
10/31/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	RK	Review business plan draft rebuttal report.	2.0
10/31/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	SC	Revise content for expert report for business plan workstream	1.6
10/31/2025	TGP	Analyze the Debtors' business plan projections under various revenue assumptions	1.2
10/31/2025	TGP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
Total Professional Hours			**803.6**

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Re: Business and Strategic Plan
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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.9	$	7,154.00
Kathryn B McGlynn	$1,415	1.2		1,698.00
Greg Magrisi	$1,250	24.1		30,125.00
Jerry Wang	$1,225	9.0		11,025.00
Johnny Lee	$1,225	45.0		55,125.00
Ashutosh Panda	$1,150	190.1		218,615.00
Joel Amico	$1,150	4.5		5,175.00
Iain Nelson	$1,120	41.7		46,704.00
Matthew D Gates	$1,120	0.9		1,008.00
Ryan Komendowski	$1,080	5.6		6,048.00
Matthew Root	$1,000	0.7		700.00
Thomas G Prince	$950	50.3		47,785.00
Christopher Cuomo	$910	45.5		41,405.00
Susan Clark	$910	207.3		188,643.00
Chase Hood	$850	1.1		935.00
Lucas Lovatto	$835	156.2		130,427.00
Francisco Carafi	$445	15.5		6,897.50
Total Professional Hours and Fees		**803.6**	**$**	**799,469.50**

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Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	TGP	Analyze FTI's proposed retention	0.9
10/01/2025	TGP	Analyze Moelis' proposed retention	1.4
10/02/2025	TGP	Analyze FTI's proposed retention	0.4
10/02/2025	TGP	Analyze Moelis' proposed retention	0.7
10/06/2025	KBM	Review FTI retention application	0.6
10/06/2025	KBM	Review Moelis retention application	0.6
10/06/2025	KBM	Revise FTI and Moelis fee analysis	0.9
10/22/2025	KBM	Review information related to MIP analysis	0.3
Total Professional Hours			**5.8**

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Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	2.4	$	3,396.00
Thomas G Prince	$950	3.4		3,230.00
Total Professional Hours and Fees		**5.8**	**$**	**6,626.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Provide comments on W&C declaration	0.8
10/01/2025	JA	Review various data room files and provide summary overview	0.8
10/01/2025	MDG	Set up analysis of unencumbered assets	2.0
10/01/2025	TGP	Analyze the Debtors' historical financials	1.8
10/01/2025	TGP	Analyze the Debtors' scheduled assets	2.1
10/02/2025	DM	Review ModivCare accounting practices	0.5
10/02/2025	JA	Analyze various financial information and DIP budget expenses	0.9
10/02/2025	JA	Review historical financial data and related cash flow and business plan detail	1.0
10/02/2025	JA	Review revised due diligence list and updated files in data room	0.7
10/02/2025	MDG	Review updates to diligence request list	2.4
10/03/2025	CH	Review new items uploaded to virtual data room	1.2
10/03/2025	CH	Review settlement with United Healthcare	0.5
10/03/2025	JA	Review debtors settlement proposal	0.3
10/03/2025	JA	Review various data room documents re prep for upcoming hearing and W&C requests	2.0
10/03/2025	MDG	Prepare analysis of unencumbered assets	2.0
10/03/2025	TGP	Analyze the Debtors' historical operations to draft descriptions for UCC presentation materials	2.3
10/03/2025	TGP	Analyze the Debtors' scheduled liabilities	2.1
10/04/2025	CC	Calculate trade spend and count analysis for J. Amico and D. MacGreevey (AlixPartners)	0.6
10/05/2025	CH	Correspondence with team re: document review and outstanding data requests	0.4
10/05/2025	CH	Review new production uploads for responsive documents	1.7
10/05/2025	MDG	Revise analysis of unencumbered assets	1.5
10/06/2025	JA	Analyze proposed creditor settlement and identify diligence requests	0.7
10/06/2025	JA	Review various documents produced from Debtors re up tier transaction and financial projections	1.4
10/06/2025	JA	Update to diligence tracker based on review of various data room files	0.8
10/06/2025	MDG	Review open items on diligence list	1.0
10/06/2025	TGP	Analyze documents provided through discovery	2.7
10/07/2025	JA	Provide comment on various W&C motions	0.8
10/07/2025	JA	Review court descriptions re diligence questions	1.2
10/07/2025	JA	Review diligence requests and update for revisions and materials received	1.5
10/07/2025	JA	Review vendor payment data and updated liquidity outlook	0.9
10/07/2025	MDG	Review docket for various debtor filings and determine response status	0.5
10/08/2025	JA	Analyze prepetition vendor payments	0.5
10/08/2025	JA	Review documents related to historical debtor transactions and develop diligence questions	1.5
10/08/2025	JA	Review historical financial information and developed view on unencumbered assets in response to W&C diligence	1.0
10/09/2025	CH	Review new documents uploaded to virtual dataroom related to prepetition sale process	1.3
10/09/2025	JA	Draft of various diligence questions and perform financial analysis re Q1 transactions	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JA	Review various documents produced per discovery re valuation and financial projections	1.3
10/09/2025	KBM	Review outstanding information requests and next steps	0.6
10/09/2025	MDG	Additional research for W&C team re: lien challenge questions	1.0
10/09/2025	MDG	Update diligence list	1.7
10/09/2025	MDG	Prepare for diligence call with FTI	0.5
10/09/2025	MDG	Review contracts in Datasite dataroom	1.0
10/10/2025	CC	Review 10-K for business background information	0.8
10/10/2025	JA	Analysis and provide comments on the waterfall and reconcile with Plan documents	1.3
10/10/2025	JA	Analyze year end liquidity and Q1 2026 working capital requirements	1.1
10/10/2025	JA	Review documents in data room and provided via production process; update diligence list	1.0
10/10/2025	JA	Review various ownership changes in Q1 2025 re uptier transaction	0.7
10/10/2025	JT	Prepare a workbook detailing ownership history of the company's debt	1.6
10/10/2025	MDG	Research bank accounts potentially under DACA for W&C	1.0
10/10/2025	MDG	Research contract summaries in business plan for W&C	1.0
10/13/2025	CH	Review latest relativity data production for responsive documents	1.3
10/13/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: Review NWC assumptions in the financial model	0.4
10/13/2025	JA	Draft of diligence questions for upcoming informal debtor interviews	1.0
10/13/2025	JA	Review various documents produced in Relativity	0.9
10/13/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: Review NWC assumptions in the financial model	0.4
10/13/2025	JT	Develop a calculation for the 1L make whole provision	1.4
10/13/2025	MDG	Research re: lien challenge workstream	1.0
10/13/2025	MDG	Review diligence request list and compare to information provided and outstanding	1.5
10/14/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: analysis of sources and uses detail	0.3
10/14/2025	JA	Prepare materials and diligence questions for informal Debtor interviews	1.2
10/14/2025	JA	Review historical diligence info re prior forecasts	0.5
10/14/2025	JA	Review open diligence request list and identify high priority request items	1.0
10/14/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: analysis of sources and uses detail	0.3
10/14/2025	JT	Develop an excel view of the liquidity bridge to the 8/20 DIP budget	0.8
10/15/2025	CH	Review C. Shandler declaration re: UCH settlement	0.3
10/15/2025	JA	Analyze Debtor's proposed settlement and provide comments	0.6
10/15/2025	JA	Analyze various cash and business plan model to determine risk and opportunities in estimated post effective date cash	1.3
10/15/2025	JA	Review background materials and draft of questions for upcoming Debtor interviews	1.2
10/15/2025	JA	Review business plan and valuation materials to determine follow up diligence questions	1.1
10/15/2025	JT	Develop diligence questions re: working capital changes in company projections	0.6

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/15/2025	JT	Revise NWC analysis workbook based on additional detail received from Moelis	1.3
10/15/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
10/15/2025	MDG	Prepare information re: lien challenge and send to W&C	0.5
10/16/2025	CH	Review new documents uploaded to virtual dataroom related to liquidation analysis and historical cash flow budgets	1.7
10/16/2025	JA	Draft of various diligence questions for upcoming Debtor interviews	0.9
10/16/2025	JT	Develop a bridge of cash balances per the Sources and Uses to the Company's 3-statement model	0.9
10/16/2025	JT	Develop a bridge of cash balances per the Sources and Uses to the DIP Budget	1.3
10/17/2025	JA	Analyze certain Plan definitions and recovery calculations	1.3
10/17/2025	JA	Model out of various liquidity and valuation scenarios	1.6
10/17/2025	JT	Correspondence with V. Diwanji (Moelis) re: NWC diligence questions	0.4
10/17/2025	MDG	Research re: lien challenges	0.7
10/20/2025	CH	Review documents uploaded to virtual data room re: projections support and prepetition transactions	1.6
10/20/2025	JA	Analyze recoveries and claims estimated under various scenarios	1.2
10/20/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: review of NWC projections	0.4
10/20/2025	JT	Analyze NWC projections from FY26-FY30 based on the company's 3-statement model	2.7
10/20/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: review of NWC projections	0.4
10/20/2025	KBM	Review updates related to open information requests	0.3
10/20/2025	MDG	Review due diligence list and request status	0.5
10/21/2025	CC	Format worksheet for management incentive plan precedent deals	0.3
10/21/2025	CC	Research management incentive plan precedent deals	2.8
10/21/2025	CC	Research plan values and payment structures re management incentive plan precedent deals	1.2
10/21/2025	JA	Analyze certain settlement offers and impact on general unsecured creditors class	0.8
10/21/2025	JA	Analyze various claims recovery scenarios	0.7
10/21/2025	KBM	Review updates to outstanding information requests	0.2
10/21/2025	MDG	Research information related to lien challenges	3.0
10/22/2025	CC	Research management incentive plan precedent deals re: form and structure of consideration	1.8
10/22/2025	JA	Analyze proposed Debtor settlement with counter party	0.5
10/22/2025	KBM	Review updates re: unencumbered assets analysis	0.2
10/22/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
10/22/2025	TGP	Research re: prepetition transactions	1.8
10/23/2025	JA	Review open diligence items relating to liquidity and cash at effective date	1.6
10/23/2025	TGP	Research re: prepetition transactions	1.9
10/24/2025	CH	Research re: fixed asset appraisals	0.7
10/24/2025	CH	Review documents uploaded to virtual data room re: transportation agreements	1.2
10/24/2025	JA	Provide supporting analysis to W&C re projections	1.2
10/24/2025	JA	Review open diligence requests and prioritize re business plan and valuation	1.0
10/24/2025	MDG	Research re: W&C objection support	2.0
10/27/2025	CH	Review draft objection to UHC settlement	0.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	DM	Emails with R. Beil (W&C), J. Shapiro, D. Kiyosaki (FTI), M. Gates and J. Amico re: priority ModivCare diligence items	0.3
10/27/2025	JA	Analyze various diligence related to letters of credit	0.5
10/27/2025	JA	Review various business plan projections in 2025 and reconcile differences	1.6
10/27/2025	JA	Update to list of outstanding diligence questions	0.6
10/27/2025	JA	Prepare various diligence questions and responses per W&C request re upcoming hearing	0.5
10/27/2025	KBM	Review unencumbered analysis	0.4
10/27/2025	MDG	Revise and submit diligence requests	1.2
10/27/2025	MDG	Revise diligence list requests and submit to FTI	0.6
10/28/2025	DM	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	DM	Emails with attachments with J. Amico, J. Lee re: UHC contract negotiation practices	0.4
10/28/2025	JA	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	JA	Draft of open diligence request list; confirm updates in data room	1.0
10/28/2025	JA	Draft of updated workstream list for team call with proposed next steps and action items	0.5
10/28/2025	JL	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	KN	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.2
10/28/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
10/28/2025	MDG	Further research related to lien challenge data requests	0.7
10/28/2025	RK	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.2
10/29/2025	CH	Review prepetition insider payment detailed breakout	0.7
10/29/2025	JA	Develop new model to perform scenario analysis on potential recovery scenarios for unsecured creditors	0.7
10/29/2025	JA	Review various historical documents re financial projections and LC projections re deposition prep	1.4
10/29/2025	JA	Update to diligence request list for new items and analyze new data room documents	1.0
10/29/2025	MDG	Further research related to lien challenge	0.6
10/30/2025	JA	Analyze various historical cash forecast per counsel request	0.5
10/30/2025	JA	Draft of diligence questions for upcoming Debtor depositions	1.0
10/30/2025	JA	Prepare talking points and outline for upcoming Committee call	0.5
10/30/2025	JA	Review various data room documents re letters of credit and surety bonds	0.7
10/31/2025	JA	Analyze various recovery scenarios based on revising assumptions on valuation and consideration options	0.8
10/31/2025	JA	Draft of questions re upcoming debtor depositions	0.9
10/31/2025	MDG	Review September payment matrices	0.8
Total Professional Hours			**136.8**

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Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Kevin Nystrom	$1,430	0.2		286.00
Kathryn B McGlynn	$1,415	1.7		2,405.50
Johnny Lee	$1,225	0.3		367.50
Joel Amico	$1,150	56.1		64,515.00
Matthew D Gates	$1,120	28.7		32,144.00
Ryan Komendowski	$1,080	0.2		216.00
John Tutty	$950	12.1		11,495.00
Thomas G Prince	$950	14.7		13,965.00
Christopher Cuomo	$910	7.5		6,825.00
Chase Hood	$850	13.0		11,050.00
Lisa Marie Bonito	$580	0.8		464.00
Total Professional Hours and Fees		**136.8**	**$**	**145,923.00**

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
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Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	JA	Review certain debtor motions including ordinary course professionals and provide comments	0.4
10/03/2025	JL	Review UHC settlement agreement and analysis of run rate vs settlement	0.9
10/07/2025	MDG	Prepare analysis of ordinary course professionals motion	2.5
10/08/2025	JA	Review and diligence of OCP motion and other debtor related retention applications	1.1
10/08/2025	KBM	Review analysis of ordinary course professionals motion	0.7
10/08/2025	KBM	Review ordinary course professionals motion	0.6
10/09/2025	JA	Review various diligence requests related to OCP motion	0.5
10/09/2025	KBM	Review additional information related to ordinary course professionals	0.6
10/22/2025	JL	Research and review UnitedHealthcare settlement items	1.8
10/23/2025	JL	Prepare research/analysis on UHC relationship	1.3
10/27/2025	DM	Review UCC objection to proposed UHC 9019 settlement	0.3
10/28/2025	JA	Review various materials and provide support to W&C for upcoming UHC hearing	0.5
10/28/2025	JL	Provide counsel with requested information to support UHC objection and hearing	0.9
10/29/2025	DM	Review ModivCare Debtors' reply to UCC objection to proposed UHC 9019 settlement	0.3
10/29/2025	DM	Review statement of consenting creditors re: W&C retention application	0.3
Total Professional Hours			**12.7**

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Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Johnny Lee	$1,225	4.9		6,002.50
Joel Amico	$1,150	2.5		2,875.00
Matthew D Gates	$1,120	2.5		2,800.00
Total Professional Hours and Fees		**12.7**	**$**	**15,680.00**

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	RK	Review document production for valuation and investigation documents.	2.0
10/04/2025	RK	Analyze latest document production.	2.6
10/05/2025	RK	Analyze latest document production.	1.0
10/07/2025	CH	Review collateral review memo and exhibits prepared by W&C	0.9
10/07/2025	CR	Call with R. Komendowski, C. Rubel (AlixPartners) and C. West, A. Chase, L. Miranda, A. Hong (W&C) re: uptier transaction investigation.	0.5
10/07/2025	CR	Analyze public financial statements related to uptier transactions.	1.8
10/07/2025	RK	Call with R. Komendowski, C. Rubel (AlixPartners) and C. West, A. Chase, L. Miranda, A. Hong (W&C) re: uptier transaction investigation.	0.5
10/08/2025	CH	Analysis re: retention bonus payments	0.7
10/08/2025	CH	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	CR	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of documents related to uptiering transactions	0.7
10/08/2025	CR	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	CR	Review financial statements and other docs related to uptier transactions.	1.5
10/08/2025	JA	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	JT	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of documents related to uptiering transactions	0.7
10/08/2025	JT	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	JT	Review key documents identified by counsel connected to uptier transaction	2.8
10/08/2025	JT	Summarize the contents of key documents identified by counsel as part of uptier transaction review	2.6
10/08/2025	MDG	Research answers re: lien challenge questions	2.5
10/08/2025	RK	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	RK	Review production for historical solvency analysis.	2.8
10/08/2025	RK	Review production for uptier transaction investigation.	2.0
10/09/2025	CH	Analyze documents produced re: uptier transaction	1.8
10/09/2025	CH	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	CH	Research related to collateral review supporting documents	0.5
10/09/2025	CR	Call with A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of company debt transactions in 2025	0.4
10/09/2025	CR	Call with C. Rubel and J. Tutty (AlixPartners) re: review of incremental term loan and uptier agreements	0.5
10/09/2025	CR	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	CR	Analyze documents related to debt swap transactions in Q1.	2.1
10/09/2025	JA	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JT	Call with A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of company debt transactions in 2025	0.4
10/09/2025	JT	Call with C. Rubel and J. Tutty (AlixPartners) re: review of incremental term loan and uptier agreements	0.5
10/09/2025	JT	Create a slide to summarize the holders of second lien notes	0.7
10/09/2025	JT	Develop a summary of lien holder parties and balances held	1.1
10/09/2025	JT	Develop slides to explain the total uptier balance	0.8
10/09/2025	JT	Develop slides with excerpts from relevant agreements to explain the uptier transaction	2.9
10/09/2025	JT	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	JT	Review Company 8-K filings in 2025 that are related to debt transactions	0.8
10/10/2025	CR	Prepare flow of funds analysis related to debt swap transactions.	1.8
10/10/2025	CR	Meeting with L. Miranda and A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of 2025 debt uptier transaction	0.3
10/10/2025	JT	Meeting with L. Miranda and A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of 2025 debt uptier transaction	0.3
10/10/2025	JT	Refine slide deck on uptier transaction based on new information received from counsel	2.1
10/10/2025	JT	Refine the slide deck to explain the uptier transaction, incorporating key excerpts from relevant agreements	2.9
10/13/2025	CR	Prepare flow of funds analysis related to debt swap transactions in Q1.	1.7
10/13/2025	CR	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of supporting documents related to the uptier transaction	0.6
10/13/2025	CR	Review dataroom materials related to debt agreements.	1.8
10/13/2025	CR	Review uptier transaction slides.	1.3
10/13/2025	JT	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of supporting documents related to the uptier transaction	0.6
10/13/2025	JT	Perform searches for documents in Relativity to support the uptier transaction review	2.1
10/13/2025	JT	Review debt documents for detail on uptier transaction	1.6
10/14/2025	CR	Analyze pre-petition debt transactions.	1.8
10/15/2025	CR	Analyze pre petition debt transactions.	1.3
10/15/2025	CR	Call with A. Chase and L. Miranda (W&C), C. Rubel and J. Tutty (AlixPartners) re: review of fifth amendment to term loan agreement	0.3
10/15/2025	JT	Analyze debt issuance costs associated with the incremental term loan	0.8
10/15/2025	JT	Call with A. Chase and L. Miranda (W&C), C. Rubel and J. Tutty (AlixPartners) re: review of fifth amendment to term loan agreement	0.3
10/15/2025	JT	Correspondence w/ L. Miranda and A. Chase (W&C) re: uptier transaction	0.3
10/15/2025	JT	Review sources and uses workbook from the incremental term loan transaction	0.4
10/16/2025	CR	Analyze pre-petition debt transactions.	1.2
10/16/2025	JT	Refine notes from call with S. Kern (ModivCare)	0.5
10/17/2025	CH	Review counsel update re: lien investigation workstream	0.4
10/17/2025	CR	Analyze pre-petition debt swap transactions.	1.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	JT	Perform document searches re: the unsecured bondholders who participated in the exchange agreement as part of the uptier transaction	1.8
10/20/2025	CR	Analyze pre-petition debt swap transaction materials.	1.2
10/21/2025	JT	Review data from Bloomberg re: ownership changes in the company's debt	1.3
10/21/2025	JT	Review key documents identified by counsel re: uptier transaction	1.9
10/22/2025	CR	Review produced documents related to debt swap transactions.	1.0
10/22/2025	JT	Compared Bloomberg trading data to files provided by the company re: debt ownership as of March 31	0.7
10/23/2025	JT	Develop requests for the company re: uptier transaction	0.3
10/23/2025	JT	Refine presentation to summarize our understanding of the uptier transaction	0.7
10/23/2025	JT	Review key documents identified by counsel re: debt agreements entered into in 2025	2.7
10/23/2025	JT	Review responses from the company re: diligence questions on debt transactions in 2025	0.6
10/28/2025	JL	Attend deposition of C. Shandler related to UHC motion	1.2
10/28/2025	JL	Continue attendance remotely, deposition of C. Shandler related to UHC motion	1.1
10/29/2025	CR	Discussion with A. Chase, L. Miranda and C. West (W&C) re: complaint.	0.6
10/29/2025	JT	Draft follow up questions for the company re: 2025 debt transactions	0.8
10/29/2025	JT	Summarize documents identified by counsel re: uptier transaction review	2.4
10/30/2025	JT	Develop a matrix of the company's historical debt holders based on additional documents provided by the company	2.7
10/31/2025	JT	Analyze intercreditor agreement re: detail on the uptier transaction	1.8
Total Professional Hours			**90.2**

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PROFESSIONAL	RATE	HOURS		FEES
Christopher Rubel	$1,225	24.9	$	30,502.50
Johnny Lee	$1,225	2.3		2,817.50
Joel Amico	$1,150	0.7		805.00
Matthew D Gates	$1,120	2.5		2,800.00
Ryan Komendowski	$1,080	11.2		12,096.00
John Tutty	$950	43.6		41,420.00
Chase Hood	$850	5.0		4,250.00
Total Professional Hours and Fees		**90.2**	**$**	**94,691.00**

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Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	CH	Initial review of claims register received from Verita	1.7
10/07/2025	CH	Analyze filed claims to remove duplicative, amended, settled, and withdrawn claims from claim estimate	2.4
10/07/2025	CH	Call with T. Prince and C. Hood (AlixPartners) re: claims analysis	0.4
10/07/2025	KBM	Review information related to filed claims	0.6
10/07/2025	TGP	Call with T. Prince and C. Hood (AlixPartners) re: claims analysis	0.4
10/08/2025	CH	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/08/2025	CH	Continue to analyze filed claims to remove duplicative, amended, settled, and withdrawn claims from claim estimate	2.7
10/08/2025	CH	Continue to reconcile prepetition payment detail with scheduled and filed claims	1.8
10/08/2025	CH	Reconcile prepetition payment detail with scheduled and filed claims	2.1
10/08/2025	HO	Revise discrepancies between names in vendor payments list and claims list	3.6
10/08/2025	MDG	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/08/2025	TGP	Analyze the Debtors' claims register	0.8
10/08/2025	TGP	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/09/2025	MDG	Review claims register	0.7
10/10/2025	MDG	Input data into AlixPartners claims platform to analyze claims	0.5
10/10/2025	MDG	Review claims register file	1.0
10/13/2025	MDG	Analyze claims register	1.5
10/15/2025	CH	Analyze revised lease rejection claims analysis	0.3
10/16/2025	CH	Performed analysis of filed and scheduled claims	0.3
10/17/2025	MDG	Analyze claims data	1.8
10/20/2025	JA	Analyze general unsecured creditors claims estimate	0.8
10/20/2025	SL	Begin preparing the claims module for claim reconciliation process	1.7
10/20/2025	SL	Review of various filed claims	0.3
10/20/2025	SL	Review latest claims report and begin formatting for the claims module	1.6
10/20/2025	SL	Review latest entity level information and prepare updates to the claims module accordingly	1.3
10/21/2025	KBM	Review illustrative recovery analysis	0.4
10/21/2025	MDG	Analyze claims file and prepare summary reports	1.4
10/21/2025	MDG	Analyze claims register and prepare summary reports	0.2
10/21/2025	SL	Continue to prepare updates to the latest claims register to begin uploading to the module for the claims reconciliation process	1.8
10/21/2025	SL	Review claims agent categorization and update records accordingly	1.6
10/21/2025	SL	Review scheduled claim detail provided in the claims register and update claims module accordingly	1.3
10/22/2025	CH	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/22/2025	CH	Correspondence with claims agent re: claims register data	0.2
10/22/2025	JA	Analyze unsecured claims pool	0.5
10/22/2025	MDG	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/22/2025	SL	Begin review of scheduled claims trumped by filed and update the claims module accordingly	1.7
10/22/2025	SL	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/22/2025	SL	Review filed claim detail provided in the claims register and update the claims module accordingly	2.1
10/22/2025	TGP	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	CH	Analyze claims filings to remove duplicative, redundant and amended claims from estimated claims pool	2.8
10/23/2025	CH	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	CH	Continue to analyze claims filings to remove duplicative, redundant and amended claims from estimated claims pool	1.7
10/23/2025	JA	Analyze general unsecured creditors claims pool	1.0
10/23/2025	MDG	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	MDG	Review claim form images	2.0
10/23/2025	SL	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	SL	Continue to review latest updates on the claim register and ensure updates captured accordingly on the claims module	1.3
10/23/2025	SL	Prepare report of filed and schedule claim comparison for further review and validation	0.9
10/23/2025	SL	Prepare report of filed and schedule claim comparison for further review and validation	1.8
10/24/2025	CH	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/24/2025	CH	Draft claims reconciliation analysis re: duplicative, amended and redundant claims	2.4
10/24/2025	MDG	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/24/2025	SL	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/24/2025	SL	Continue to review latest claims register for duplicated, amended and redundant claims	1.9
10/24/2025	SL	Prepare filed claims report for review for duplication, amendments and redundant claims	2.1
10/27/2025	CH	Analyze claims register to match filed and scheduled claims for estimated claims pool	2.4
10/27/2025	CH	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2
10/27/2025	CH	Continue to analyze claims register to match filed and scheduled claims for estimated claims pool	2.1
10/27/2025	MDG	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2
10/27/2025	SL	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2

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Re: Claims Analysis
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	SL	Continue to review latest review of filed claims for potential duplication and update tracker accordingly	1.8
10/27/2025	SL	Finalize review of filed claim duplication/amendment feedback, and prepare updates to the claims report accordingly	1.4
10/28/2025	CH	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	DM	Review ModivCare Debtors' high level general unsecured creditors claims analysis	0.4
10/28/2025	JA	Review Debtor claims analysis and reconcile against filed claims data	1.1
10/28/2025	MDG	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	MDG	Review claims forms	1.5
10/28/2025	SL	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	SL	Continue to finalize updates to the latest scheduled vs. filed claim detail and ensure updates are captured accordingly in latest reports	1.5
10/28/2025	SL	Finalize updates to the schedule claim detail on the claims module and ensure reports reflect updates accordingly	1.4
10/28/2025	SL	Review latest input provided on the claims module and ensure updates are reflected accordingly in latest reports	1.7
10/28/2025	TGP	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/29/2025	CH	Analyze illustrative general unsecured claims analysis and related assumptions prepared by FTI	0.9
10/29/2025	CH	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	CH	Draft analysis re: estimated scheduled and filed administrative claims	0.6
10/29/2025	CH	Draft analysis re: estimated scheduled and filed general unsecured claims and claims by type	1.7
10/29/2025	CH	Draft analysis re: estimated scheduled and filed priority claims	0.5
10/29/2025	CH	Draft analysis re: estimated scheduled and filed secured claims	0.7
10/29/2025	CH	Draft illustrative general unsecured claims estimate	1.2
10/29/2025	KBM	Review UHC settlement agreement	0.9
10/29/2025	KBM	Review updated unsecured recovery analysis	0.6
10/29/2025	MDG	Analyze filed claims	0.1
10/29/2025	MDG	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	MDG	Review claims and selected claim forms	1.8
10/29/2025	SL	Begin preparing updated claim summary reporting package for upcoming claims presentation	1.4
10/29/2025	SL	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	TGP	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/30/2025	CH	Review individual claims filings for further detail in support of claims analysis	2.7

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Re: Claims Analysis
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/30/2025	KBM	Review objection to UHC settlement	0.7
10/30/2025	KBM	Review updates re: UHC settlement approval	0.4
10/30/2025	MDG	Review claims presentation and selected claims	2.4
10/30/2025	SL	Continue to finalize updates to the claim summary report and ensure latest feedback incorporated into claims presentation	2.2
10/30/2025	SL	Continue to finalize updates to the latest scheduled vs. filed claim detail and ensure updates are captured accordingly in latest reports	1.4
10/30/2025	SL	Finalize remaining claim updates in the claims module and update claims presentation with final changes for review and sign-off	1.7
10/31/2025	CH	Analysis re: lease rejection claims	0.9
10/31/2025	CH	Draft updates to claims analysis to incorporate comments from M. Gates (AlixPartners)	1.2
10/31/2025	CH	Review schedule of assumed executory contracts and leases and related cure costs	0.7
10/31/2025	MDG	Correspondence with D. MacGreevey (AlixPartners) re: claims	0.2
10/31/2025	MDG	Review claims presentation and provide comments	1.6
Total Professional Hours			**104.8**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.4	$	584.00
Kathryn B McGlynn	$1,415	3.6		5,094.00
Joel Amico	$1,150	3.4		3,910.00
Matthew D Gates	$1,120	18.3		20,496.00
Sam Lemack	$980	37.3		36,554.00
Thomas G Prince	$950	2.2		2,090.00
Chase Hood	$850	36.0		30,600.00
Hugh Olohan	$535	3.6		1,926.00
Total Professional Hours and Fees		**104.8**	**$**	**101,254.00**

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JM	Draft valuation report.	2.4
10/01/2025	JM	Review ModivCare earnings call transcripts.	2.7
10/01/2025	MR	Perform analysis of valuation materials in the ModivCare Disclosure Statement.	0.4
10/01/2025	RK	Review documents produced for valuation analysis.	2.0
10/02/2025	JM	Draft valuation report.	3.0
10/02/2025	JM	Research NEMT industry.	2.4
10/02/2025	JM	Review ModivCare investor presentations.	2.8
10/02/2025	MR	Perform analysis of segment-level financial data for ModivCare valuation analysis.	2.3
10/02/2025	RK	Review historical board minutes produced for EBITDA adjustments.	2.9
10/03/2025	JM	Draft valuation report.	2.4
10/03/2025	JM	Research personal care industry.	2.6
10/03/2025	JM	Review uptier transaction.	2.3
10/03/2025	MB	Conduct valuation analysis	2.1
10/03/2025	MR	Prepare draft presentation for ModivCare valuation.	1.2
10/05/2025	MR	Analyze valuation calculations in Moelis Illustrative Alternate Transaction Scenario Analysis document.	0.8
10/06/2025	JM	Respond to review comments on valuation report.	2.2
10/06/2025	JM	Review dataroom for information on National MedTrans transaction.	1.5
10/06/2025	JM	Review earnings calls transcripts for guideline companies.	2.6
10/06/2025	MB	Review valuation data	0.7
10/06/2025	MR	Review diligence tracker and responses for ModivCare valuation materials.	0.8
10/06/2025	RK	Analyze latest document production for historical solvency review.	1.4
10/06/2025	RK	Review January projections for historical solvency review.	2.1
10/07/2025	JA	Review various Debtor provided materials related to q1 transactions	1.0
10/07/2025	JM	Respond to review comments on valuation report.	1.6
10/07/2025	JM	Searched dataroom for results of Deutsche Bank sales process.	2.4
10/07/2025	MB	Review ModivCare financial documents	0.9
10/07/2025	MR	Prepare analysis of ModivCare guideline company multiples over time.	1.3
10/07/2025	MR	Prepare draft presentation for ModivCare valuation.	2.7
10/07/2025	RK	Analyze latest document production for historical solvency review.	1.7
10/07/2025	RK	Review discount rate inputs for valuation analysis.	2.4
10/07/2025	RK	Review the disclosure statement for waterfall analysis.	1.8
10/08/2025	CR	Analyze solvency implications of first quarter debt swap transactions.	1.3
10/08/2025	CR	Draft valuation expert report.	1.4
10/08/2025	JM	Update precedent transaction analysis.	2.6
10/08/2025	JM	Update valuation analysis.	3.0
10/08/2025	MR	Perform analysis of ModivCare financial metrics for valuation analysis.	1.7
10/08/2025	RK	Document review and analysis for valuation workstreams.	3.0
10/08/2025	RK	Prepare historical solvency review.	1.4
10/09/2025	CH	Analysis re: amended plan recovery mechanics	0.7
10/09/2025	CR	Assessed solvency in connection with pre petition debt swap transactions.	0.9
10/09/2025	JM	Analyze comparable company bond prices.	1.4
10/09/2025	JM	Review dataroom for information on Matrix transaction.	2.7
10/09/2025	MR	Perform guideline company analysis for draft ModivCare valuation.	1.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	RK	Prepare company valuation analysis.	2.2
10/09/2025	RK	Review document production for business plan assumption support.	1.9
10/09/2025	RK	Review public transaction multiples for valuation analysis.	2.6
10/10/2025	CH	Draft analysis re: recovery hurdle amounts	0.8
10/10/2025	CH	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	CC	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: alignment on valuation methodology	0.3
10/10/2025	CR	Assessed solvency in connection with debt swap transactions.	1.9
10/10/2025	CR	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	DM	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JA	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JT	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JM	Update valuation report.	2.7
10/10/2025	MB	Review ModivCare financial data	1.2
10/10/2025	MR	Prepare draft presentation for ModivCare valuation.	2.6
10/10/2025	MR	Review guideline company filings and analyst reports for ModivCare valuation analysis.	0.9
10/10/2025	RK	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	RK	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: alignment on valuation methodology	0.3
10/10/2025	RK	Prepare valuation analyses for multiple periods in 2025.	3.0
10/10/2025	RK	Review documents produced for historical solvency analysis.	2.4
10/12/2025	MR	Review valuation analysis in Moelis discussion materials.	0.6
10/12/2025	RK	Review the Moelis valuation analysis.	2.0
10/13/2025	CH	Analyze valuation materials prepared by Moelis	1.8
10/13/2025	CR	Draft valuation report slides.	1.3
10/13/2025	CR	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	JA	Review Debtors valuation analysis	1.0
10/13/2025	JT	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	JM	Review Moelis valuation report.	2.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/13/2025	MR	Analyze guideline company valuation multiples over time for ModivCare valuation.	2.9
10/13/2025	MR	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report.	1.0
10/13/2025	MR	Perform research re: guideline company segment data for ModivCare valuation.	0.8
10/13/2025	MR	Perform research re: ModivCare NEMT segment for valuation analysis.	1.9
10/13/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	2.1
10/13/2025	RK	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	RK	Analyzed Moelis valuation report for rebuttal	2.0
10/13/2025	RK	Prepare uptier solvency analysis.	1.8
10/14/2025	CR	Analyze balance sheet solvency in connection with pre petition debt swap transactions.	1.8
10/14/2025	CR	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/14/2025	CR	Review market trading data.	1.2
10/14/2025	JT	Analyze comparable transactions identified by the company to support its valuation	2.1
10/14/2025	JT	Call with R. Komendowski and J. Tutty (AlixPartners) re: review of comparable transactions for company valuation	0.5
10/14/2025	JT	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/14/2025	JT	Develop slides in valuation presentation re: comparable transactions	1.6
10/14/2025	JT	Research additional comparable companies as part of the valuation developed by the UCC	1.1
10/14/2025	RK	Call with R. Komendowski and J. Tutty (AlixPartners) re: review of comparable transactions for company valuation	0.5
10/14/2025	RK	Review plan updated plan documentation for valuation analysis updates.	1.3
10/14/2025	RK	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/15/2025	CR	Prepare valuation analysis related to proposed plan negotiations.	2.1
10/15/2025	CR	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	JA	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	JT	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	JT	Refine analysis of comparable transactions to support UCC company valuation	1.7
10/15/2025	JT	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	MB	Review ModivCare valuation	0.9
10/15/2025	MB	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	MR	Perform quality review of cost of capital analysis for ModivCare valuation.	2.0
10/15/2025	MR	Perform reconciliation of Moelis valuation analysis.	2.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/15/2025	MR	Review cost of debt benchmarks for ModivCare cost of capital analysis.	0.9
10/15/2025	MR	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation.	1.3
10/15/2025	RK	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	RK	Review company business plan for NWC assumptions.	2.2
10/15/2025	RK	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/16/2025	CR	Review valuation slide deck.	0.8
10/16/2025	JT	Review available documents for historical actual and projected EBITDA results by business segment	1.6
10/16/2025	JT	Summarize historical actual and projected EBITDA results by business segment based on documents and SEC filings reviewed	1.4
10/16/2025	MR	Analyze discounted cash flow analysis in Moelis valuation materials.	2.0
10/16/2025	MR	Perform guideline transaction approach for ModivCare valuation.	2.5
10/16/2025	MR	Prepare valuation sensitivity analysis for Moelis cost of capital.	2.8
10/16/2025	MR	Reconcile Moelis cost of capital data against available market data.	1.8
10/16/2025	RK	Prepare valuation questions for Company interviews.	3.0
10/16/2025	RK	Review documents provided by Company for valuation and solvency analysis.	1.5
10/17/2025	AP	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CH	Review expert report of Z. Jamal	1.4
10/17/2025	CC	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CR	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	JA	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	JT	Refine analysis of changes to the company's EBITDA projections by business segment over time	1.1
10/17/2025	JT	Review available documents for historical and future projected Capital Expenditures	1.9
10/17/2025	JT	Review detail on company Letters of Credit	0.7
10/17/2025	JT	Review presentation on company valuation prepared by Moelis	0.5
10/17/2025	JT	Summarize the company's prior actual and projected liquidity balances from available documents	0.8
10/17/2025	JL	Participate in a call with R. Komendowski, J. Amico, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	LL	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	MB	Review valuation data	0.7
10/17/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	MR	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	MR	Perform quality review of ModivCare valuation model.	1.6
10/17/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	MR	Research re: market debt yields for ModivCare valuation analysis.	0.8
10/17/2025	RK	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	RK	Prepare valuation scenario analysis for settlement meeting.	2.1
10/17/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	SC	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/18/2025	MR	Perform research re: transportation guideline companies in Moelis valuation materials.	1.3
10/19/2025	DM	Review settlement deck and provide edits	0.2
10/19/2025	JA	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	JT	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	KBM	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	MDG	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	MR	Analyze impact of equity rights offering in Moelis valuation materials.	2.6
10/19/2025	MR	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement.	0.2
10/19/2025	MR	Perform quality review of updated ModivCare valuation analysis.	1.1
10/19/2025	RK	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/19/2025	RK	Prepare valuation analysis for upcoming committee meetings.	2.0
10/20/2025	CH	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	CH	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	CH	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	CH	Draft hurdle analysis and demonstrative for settlement discussion materials	1.3
10/20/2025	CH	Draft updates to W&C settlement materials	0.9
10/20/2025	CH	Review draft settlement discussion materials	1.1
10/20/2025	CR	Analyze comparable companies based on business plan and Moelis valuation.	2.3
10/20/2025	CR	Analyze Moelis valuation materials.	1.5
10/20/2025	JA	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	JA	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	JA	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	JT	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	JT	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	JT	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	MB	Review and provide comments on current valuation report	0.6
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation.	0.4
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation.	0.3
10/20/2025	MR	Review supporting documents provided by Moelis re: ModivCare valuation analysis.	1.7
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	RK	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	RK	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	RK	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	RK	Prepare company valuation adjustments for settlement meeting discussion.	2.6
10/20/2025	RK	Prepare settlement analysis for meeting.	1.6
10/20/2025	RK	Update recovery waterfall analysis for updated distributable value assumptions.	2.0
10/20/2025	TGP	Analyze expert report of Z. Jamal	1.4
10/21/2025	CH	Analyze Moelis illustrative recovery analysis and related assumptions	0.5
10/21/2025	CH	Draft updates to settlement materials	0.8
10/21/2025	CR	Analyze Moelis valuation materials.	1.7
10/21/2025	CR	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	DM	Analyze Z. Jamal (Moelis) expert report re: ModivCare Plan valuation	1.2
10/21/2025	DM	Review Debtors projections over time in 2025	0.9
10/21/2025	JA	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/21/2025	JT	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/21/2025	MR	Analyze market data in Moelis valuation materials.	0.8
10/21/2025	RK	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/22/2025	CR	Analyze settlement offer economics.	1.5
10/22/2025	CR	Draft and reviewed valuation expert report.	1.5
10/22/2025	JT	Review waterfall in valuation model for alignment with latest settlement offer	1.1
10/22/2025	JT	Revise calculation for general unsecured creditors pool based on latest available information	0.7
10/22/2025	JT	Revise valuation model based on the latest settlement discussions	0.8
10/22/2025	MB	Review data for valuation analysis	0.8
10/22/2025	MR	Perform analysis of betas in Moelis valuation materials.	1.1
10/23/2025	CH	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	CR	Review market research materials related to plan valuation.	1.8
10/23/2025	CR	Review valuation expert report.	1.5
10/23/2025	JA	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	JT	Analyze statement of cash flows included in the company's 3-statement model from FY26-FY30	1.4
10/23/2025	MB	Conduct valuation analysis	1.1
10/23/2025	MDG	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	MR	Prepare presentation materials for ModivCare valuation.	2.6
10/23/2025	RK	Call with V. Sachdev (W&C) re: valuation waterfall implications.	0.3

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	RK	Review business plan analysis for valuation impacts.	2.0
10/24/2025	CH	Review equity rights offering valuation support provided by Moelis	0.4
10/24/2025	CR	Review sec. 552 valuation cases per counsel request.	1.3
10/24/2025	CR	Review valuation expert report deck.	1.7
10/24/2025	MB	Conduct valuation analysis	0.8
10/24/2025	MR	Perform research re: guideline transaction method for ModivCare valuation analysis.	2.5
10/24/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	1.5
10/24/2025	RK	Implement business plan adjustments into the valuation analysis.	1.9
10/24/2025	RK	Investigation into Moelis option valuation methodology.	2.6
10/25/2025	RK	Prepare draft expert rebuttal valuation report.	2.9
10/25/2025	RK	Review expert rebuttal report guideline company selection analysis.	0.9
10/26/2025	MR	Perform research re: precedent transactions analysis for ModivCare valuation.	2.1
10/27/2025	CR	Draft valuation expert report.	1.2
10/27/2025	CR	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	CR	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/27/2025	DM	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	JA	Review Debtors and Alix's valuation analyses and reconcile differences	1.1
10/27/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	MB	Conduct valuation analysis	1.2
10/27/2025	MB	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	MR	Perform research re: precedent transactions analysis for ModivCare valuation.	2.8
10/27/2025	MR	Perform research re: selected publicly traded companies for ModivCare valuation.	0.8
10/27/2025	MR	Update ModivCare valuation slides in draft expert report.	2.3
10/27/2025	MR	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/27/2025	RK	Prepare the draft expert rebuttal valuation report.	2.6
10/27/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	RK	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/28/2025	CH	Review latest proposal received from ad hoc group	0.4
10/28/2025	CR	Analyze valuation indicia in connection with first quarter financing transactions.	1.8
10/28/2025	JL	Review business valuation analysis and report	1.1
10/28/2025	MB	Review valuation analysis	2.8
10/28/2025	MR	Analyze beta for selected publicly traded companies for ModivCare valuation.	1.6
10/28/2025	MR	Perform analysis of historical ModivCare market data for valuation analysis.	2.7
10/28/2025	RK	Prepare the draft expert rebuttal valuation report.	2.6
10/28/2025	RK	Review the Zul Jamal expert valuation report.	2.2

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	CR	Review and provide comments on valuation expert report.	1.9
10/29/2025	JA	Review and provide comments on current draft of valuation report	0.7
10/29/2025	JL	Participate in discussion with M. Brown, J. Lee (AlixPartners) re: valuation report matters	0.5
10/29/2025	MB	Participate in discussion with M. Brown, J. Lee (AlixPartners) re: valuation report matters	0.5
10/29/2025	MB	Review business plan analysis	1.1
10/29/2025	MB	Review valuation analysis	1.9
10/29/2025	MR	Analyze ModivCare cost of capital for valuation analysis.	2.9
10/29/2025	MR	Update ModivCare discounted cash flow analysis to reflect revised business plan.	2.5
10/29/2025	MR	Update ModivCare valuation analysis in draft expert report.	1.4
10/29/2025	RK	Incorporation of adjusted business plan impact on valuation rebuttal.	2.6
10/29/2025	RK	Prepare the draft expert rebuttal valuation report.	2.3
10/29/2025	RK	Review the Zul Jamal expert valuation report.	1.1
10/30/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	JT	Call with M. Root and J. Tutty (AlixPartners) re: pricing of comparable debt instruments	0.4
10/30/2025	JT	Call with R. Komendowski and J. Tutty (AlixPartners) re: historical trading data of the company's debt	0.4
10/30/2025	JT	Review data on Bloomberg re: historical pricing and volume of the company's debt	1.7
10/30/2025	JT	Summarize data from Bloomberg re: historical debt pricing of comparable companies	1.4
10/30/2025	MB	Conduct valuation analysis	1.6
10/30/2025	MB	Review draft valuation report	1.8
10/30/2025	MB	Review valuation research	0.7
10/30/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	MR	Call with M. Root and J. Tutty (AlixPartners) re: pricing of comparable debt instruments	0.4
10/30/2025	MR	Perform analysis of debt securities for ModivCare valuation analysis.	1.9
10/30/2025	MR	Prepare ModivCare valuation materials for draft expert report.	1.6
10/30/2025	MR	Review EY valuation materials for ModivCare.	1.1
10/30/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	RK	Call with R. Komendowski and J. Tutty (AlixPartners) re: historical trading data of the company's debt	0.4
10/30/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	TGP	Analyze the Debtors' valuation analysis	1.7
10/31/2025	DM	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	DM	Review and provide comments on draft Brown ModivCare valuation report	3.7

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/31/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
10/31/2025	JA	Review valuation analysis and provide comments	0.5
10/31/2025	JA	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	JT	Analyze FY26 net working capital projections based on additional detail provided by FTI	2.3
10/31/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
10/31/2025	JT	Correspond with J. Baltaytis (FTI) re: Operating Net Working Capital in FY26	0.4
10/31/2025	JT	Review the expert valuation report	0.3
10/31/2025	KBM	Review updates related to valuation report	0.6
10/31/2025	MB	Review valuation analysis	1.6
10/31/2025	MR	Perform analysis of market data for ModivCare valuation analysis.	0.9
10/31/2025	MR	Perform quality review of discounted cash flow analysis for ModivCare valuation.	2.0
10/31/2025	MR	Perform quality review of precedent transaction analysis for ModivCare valuation.	2.7
10/31/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	2.0
10/31/2025	RK	Finalize draft rebuttal report for valuation analysis.	2.5
10/31/2025	RK	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
Total Professional Hours			**383.6**

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	7.4	$	10,804.00
Kathryn B McGlynn	$1,415	0.8		1,132.00
Marc Brown	$1,415	27.5		38,912.50
Christopher Rubel	$1,225	41.5		50,837.50
Johnny Lee	$1,225	2.8		3,430.00
Ashutosh Panda	$1,150	1.2		1,380.00
Joel Amico	$1,150	10.6		12,190.00
Matthew D Gates	$1,120	0.4		448.00
Ryan Komendowski	$1,080	96.2		103,896.00
Matthew Root	$1,000	97.8		97,800.00
John Tutty	$950	33.0		31,350.00
Thomas G Prince	$950	3.1		2,945.00
Christopher Cuomo	$910	1.5		1,365.00
Jyoji Morimoto	$910	45.3		41,223.00
Susan Clark	$910	1.2		1,092.00
Chase Hood	$850	12.1		10,285.00
Lucas Lovatto	$835	1.2		1,002.00
Total Professional Hours and Fees		**383.6**	**$**	**410,092.00**

AlixPartners

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Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	CH	Review draft disclosure statement objection	1.1
10/01/2025	JA	Provide comments to Disclosure Statement	1.2
10/01/2025	KBM	Review analyses re: disclosure statement objection	0.7
10/01/2025	KBM	Review updates re: disclosure statement objection	0.6
10/01/2025	MDG	Draft of follow up diligence items re: ERO	0.6
10/01/2025	MDG	Correspondence with W&C re: ERO	0.3
10/01/2025	MDG	Review equity rights offering calculations for disclosure statement objection	1.4
10/02/2025	KBM	Review disclosure statement objection	0.9
10/03/2025	CH	Review redline of amended plan of reorganization	0.6
10/05/2025	CH	Review summary from counsel re: amended plan and disclosure statement	0.5
10/06/2025	CH	Review Debtors' response to disclosure statement objection	0.4
10/13/2025	JA	Review Amended Disclosure Statement and Plan re recovery	0.5
10/20/2025	KBM	Review updated settlement discussion presentation	0.8
10/21/2025	CH	Analyze disclosure statements and confirmation orders for key terms re: comparable management incentive plans	2.7
10/21/2025	CH	Continue to analyze disclosure statements and confirmation orders for key terms re: comparable management incentive plans	2.3
10/21/2025	CH	Prepare management incentive plan comps template	0.8
10/21/2025	CH	Screen for potential management incentive plan comps	0.9
10/21/2025	KBM	Review changes to settlement discussion presentation	0.6
10/21/2025	KBM	Review updates to settlement discussion presentation	0.9
10/21/2025	TGP	Analyze the Debtors' proposed plan	1.3
10/22/2025	CH	Draft updates to management incentive plan comps analysis	1.6
10/22/2025	KBM	Review Debtors' presentation re: settlement negotiations	0.7
10/22/2025	KBM	Review final changes to settlement discussion presentation	0.6
Total Professional Hours			**22.0**

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Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	5.8	$	8,207.00
Joel Amico	$1,150	1.7		1,955.00
Matthew D Gates	$1,120	2.3		2,576.00
Thomas G Prince	$950	1.3		1,235.00
Chase Hood	$850	10.9		9,265.00
Total Professional Hours and Fees		**22.0**	**$**	**23,238.00**

AlixPartners

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Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	CH	Attend second day DIP hearing (remotely)	0.5
10/03/2025	JA	Attend DIP hearing	0.5
10/03/2025	KBM	Attend second day DIP hearing (remotely)	0.5
10/03/2025	MDG	Attend second day DIP hearing (remotely)	0.5
10/06/2025	AP	Attend Disclosure Statement Hearing re: Debtor's DIP order and business plan projections	1.5
10/06/2025	CH	Attend Disclosure Statement hearing (remotely)	1.2
10/06/2025	JA	Attend Disclosure Statement hearing (remotely)	1.0
10/06/2025	KBM	Attend Disclosure Statement hearing (remotely)	1.2
10/06/2025	MDG	Attend Disclosure Statement hearing (remotely)	0.8
10/10/2025	AP	Attend Status Conference re: Debtor's DIP and Disclosure statement hearing	0.5
10/10/2025	CH	Attend ModivCare status conference (remotely)	0.5
10/10/2025	DM	Attend ModivCare status conference (remotely)	0.5
10/10/2025	KBM	Attend ModivCare status conference (remotely)	0.5
10/30/2025	CH	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	2.4
10/30/2025	DM	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely)	2.6
10/30/2025	JL	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	2.7
10/30/2025	KBM	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	1.0
Total Professional Hours			**18.4**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.1	$	4,526.00
Kathryn B McGlynn	$1,415	3.2		4,528.00
Johnny Lee	$1,225	2.7		3,307.50
Ashutosh Panda	$1,150	2.0		2,300.00
Joel Amico	$1,150	1.5		1,725.00
Matthew D Gates	$1,120	1.3		1,456.00
Chase Hood	$850	4.6		3,910.00
Total Professional Hours and Fees		**18.4**	**$**	**21,752.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Veri-Za	0.9
10/02/2025	BF	Revise draft AlixPartners' retention documents	0.6
10/02/2025	KSM	Review updated draft retention documents from G. Zahiremami (W&C)	0.6
10/03/2025	KSM	Correspondence with G. Zahiremami (W& C) and B. Filler (AlixPartners) re: finalizing retention documents	0.4
10/06/2025	BF	Revise draft retention documents	0.6
10/06/2025	DM	Review, revise and comment on draft ModivCare retention documents	1.0
10/06/2025	JB	Update draft disclosures to be included in retention documents in response to comments from K. Sundt McClarren (AlixPartners)	0.7
10/06/2025	KSM	Revise draft relationship disclosures	1.1
10/09/2025	BF	Draft investor solicitation emails re: disclosures	0.8
10/09/2025	BF	Prepare revised proposed retention order incorporating U.S. Trustee comments	0.4
10/09/2025	ESK	Emails to investors re: disclosures	1.0
10/09/2025	JB	Draft Firmwide document re. disclosures	2.8
10/09/2025	JB	Continue to draft Firmwide document re. disclosures	2.2
10/09/2025	KSM	Review comments from UST re: AlixPartners' retention application	0.5
10/10/2025	ESK	Review responses to disclosure emails	0.5
10/10/2025	JB	Continue to draft firmwide document re. disclosures	1.9
10/10/2025	JB	Draft supplemental disclosures to be included in First Declaration	0.7
10/14/2025	KSM	Revise firmwide email distribution re: potential additional relationship disclosures	1.3
10/15/2025	ESK	Review firmwide email re: disclosures	1.5
10/21/2025	ESK	Review investor disclosure response	0.5
10/21/2025	KSM	Address responses to firmwide correspondence re: potential relationship disclosures	0.4
10/28/2025	KSM	Revise draft supplemental declaration re: disclosures	0.3
10/29/2025	DM	Review draft first supplemental declaration iso ModivCare retention	0.3
10/29/2025	JB	Update draft supplemental disclosures to be included in First Declaration	0.3
Total Professional Hours			**21.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.3	$	1,898.00
Elizabeth S Kardos	$950	3.5		3,325.00
Kaitlyn Sundt McClarren	$715	4.6		3,289.00
Brooke Filler	$605	2.4		1,452.00
Jennifer Braverman	$565	9.5		5,367.50
Total Professional Hours and Fees		**21.3**	**$**	**15,331.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/12/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	0.8
10/13/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.0
10/13/2025	LMB	Review Interim Compensation Motion	0.2
10/15/2025	LMB	Continue to prepare professional fees for September 2025 Monthly Fee Statement	1.3
10/15/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	3.2
10/20/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	3.0
10/20/2025	MDG	Begin review September professional fees for privilege and confidentiality	1.5
10/21/2025	LMB	Prepare draft of initial First Monthly Fee Statement	0.7
10/21/2025	LMB	Prepare initial schedule/exhibit workbook for Monthly Fee Statements	1.0
10/23/2025	MDG	Review September professional fees for privilege and confidentiality	2.3
10/27/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	2.3
10/27/2025	MDG	Review September professional fees for privilege and confidentiality	1.0
10/28/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.2
10/28/2025	MDG	Analyze professional fees for September 2025 Monthly Fee Statement for privilege and confidentiality	1.0
10/29/2025	LMB	Analyze expenses for September 2025 Monthly Fee Statement	0.7
10/30/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.3
10/30/2025	LMB	Prepare schedule/exhibit workbook for September 2025 Monthly Fee Statement	1.2
10/30/2025	MDG	Analyze professional fees for September 2025 Monthly Fee Statement for privilege and confidentiality	0.8
Total Professional Hours			**24.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
Matthew D Gates	$1,120	6.6	$	7,392.00
Lisa Marie Bonito	$580	17.9		10,382.00
Total Professional Hours and Fees		**24.5**	**$**	**17,774.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CH	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	CC	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	JA	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	RK	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/10/2025	CH	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	DM	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	JA	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	RK	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/11/2025	RK	Prepare waterfall analysis.	2.1
10/12/2025	RK	Review waterfall analysis sensitivity to valuation analysis.	2.3
10/13/2025	RK	Review the Moelis plan waterfall analysis.	2.4
10/14/2025	RK	Prepare model plan waterfall assumption analysis.	2.3
10/14/2025	RK	Prepare waterfall scenario analysis for counsel.	2.8
10/15/2025	RK	Review business plan documentation for waterfall assumption updates.	1.8
10/16/2025	RK	Prepare valuation analysis waterfall impacts for settlement meeting.	2.9
10/17/2025	RK	Prepare waterfall scenario analysis for settlement meeting.	1.9
10/17/2025	RK	Review plan documentation for waterfall sensitivity analysis.	1.5
10/18/2025	RK	Prepare waterfall scenario analysis for settlement meeting.	1.2
10/19/2025	RK	Prepare waterfall analysis for upcoming committee meetings.	2.1
10/23/2025	RK	Review documents available for entity-level value allocation analysis.	2.2
10/27/2025	RK	Review warrant and ERO value impacts on the waterfall.	1.4
10/29/2025	RK	Review ERO valuation impacts.	1.1
10/30/2025	RK	Analyze plan dilution schedules and impact on distributable value among classes.	2.2
10/30/2025	RK	Review letter of credit impact on distributable value.	2.7
Total Professional Hours			**37.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.7	$	1,022.00
Joel Amico	$1,150	1.1		1,265.00
Ryan Komendowski	$1,080	34.0		36,720.00
Christopher Cuomo	$910	0.4		364.00
Chase Hood	$850	1.1		935.00
Total Professional Hours and Fees		**37.3**	**$**	**40,306.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	DM	Travel from Houston to New York, NY (return from ModivCare DIP hearing)	7.0
10/21/2025	RK	Travel from Chicago, IL to New York (to attend settlement discussions)	3.5
10/22/2025	RK	Travel from New York, NY to Chicago, IL (return from settlement discussions)	3.5
Total Professional Hours			**14.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	7.0	$	10,220.00
Ryan Komendowski	$1,080	7.0		7,560.00
Total Professional Hours and Fees		**14.0**	**$**	**17,780.00**
Less 50% Travel Fees				(8,890.00)
Total Professional Fees			**$**	**8,890.00**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
09/16/2025	S&P Research Reports	1,210.10
09/19/2025	S&P Research Reports – September 2025	150.00
09/22/2025	Industry Research - ModivCare	893.53
10/01/2025	Airfare David MacGreevey 2025-10-01 IAH- LGA	449.00
10/01/2025	S&P Research Reports – October 2025	320.00
10/01/2025	Taxi/Car Service David MacGreevey LGA airport to Home	307.35
10/01/2025	Taxi/Car Service David MacGreevey IAH airport to Hotel	143.45
10/20/2025	Airfare Ryan Komendowski 2025-10-21 ORD- LGA	382.96
10/21/2025	Airfare Joel Amico 2025-10-21 BUF- LGA	173.72
10/21/2025	Taxi/Car Service Joel Amico Home to Buffalo airport	11.33
10/21/2025	Taxi/Car Service Joel Amico Home to Buffalo airport	62.53
10/21/2025	Taxi/Car Service Joel Amico LGA to AlixPartners office	73.26
10/21/2025	Lodging Joel Amico - Westin New York Grand Central Station, New York, NY 2025-10-21 2025-10-23 (2 nights)	1,500.00
10/21/2025	Lodging Ryan Komendowski - The Benjamin Royal Sonest - New York, NY 2025-10-21 2025-10-23 (2 nights)	1,500.00
10/21/2025	Individual Meal - Joel Amico - Breakfast	3.58
10/21/2025	Individual Meal - Ryan Komendowski - Breakfast	8.72
10/21/2025	Individual Meal - Ryan Komendowski - Lunch	8.18
10/21/2025	Individual Meal - Ryan Komendowski - Dinner	75.00
10/22/2025	Parking/Tolls Ryan Komendowski	94.27
10/22/2025	Taxi/Car Service Ryan Komendowski LGA to Hotel	82.77
10/22/2025	Individual Meal - Joel Amico - Dinner	39.90
10/23/2025	Airfare Joel Amico 2025-10-24 LGA- BUF	208.71
10/23/2025	Taxi/Car Service Ryan Komendowski Hotel to LGA	127.73
10/23/2025	Individual Meal - Joel Amico - Dinner	16.06
10/24/2025	Taxi/Car Service Joel Amico Buffalo Airport to Home	70.72

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
10/24/2025	Taxi/Car Service Joel Amico Office to LGA	51.07
10/28/2025	Individual Meal - David MacGreevey - Lunch	18.23
10/31/2025	Client Research - US Home Care Services Market Outlook	2,000.00
10/31/2025	Client Research - US Remote Patient Monitoring Market Outlook	4,950.00
10/31/2025	Client Research - US Non-Emergency Medical Transportation Market to 2031	2,450.00
Total Expenses		**17,382.17**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20014495Pa0001

Expenses		**Amount**
Airfare	$	1,214.39
Client Research		11,973.63
Ground Transportation		1,024.48
Lodging		3,000.00
Meals		169.67
Total Expenses	**USD**	**17,382.17**

Exhibit C

Third Monthly Fee Statement
November 1, 2025 through November 30, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: January 2, 2026 @ 4:00 p.m. (CT)

THIRD MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	11/1/2025	11/30/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$1,042,772.60 (80% of $1,303,465.75)	
Total expenses requested in this Fee Statement:	$5,121.11	
Total fees and expenses requested in this Fee Statement:	$1,047,893.71	
Blended hourly rate for professionals:	$1,111.70	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

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In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	80.9	$ 118,114.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	26.6	37,639.00
Marc Brown	Partner & Managing Director	$1,415	63.9	90,418.50
Greg Magrisi	Partner & Managing Director	$1,250	84.5	105,625.00
Christopher Rubel	Partner	$1,225	88.7	108,657.50
Johnny Lee	Partner	$1,225	31.1	38,097.50
Elizabeth S Kardos	Partner	$950	8.5	8,075.00
Ashutosh Panda	Director	$1,150	161.7	185,955.00
Joel Amico	Director	$1,150	123.1	141,565.00
Iain Nelson	Director	$1,120	0.3	336.00
Matthew D Gates	Director	$1,120	18.1	20,272.00
Ryan Komendowski	Director	$1,080	114.3	123,444.00
Matthew Root	Director	$1,000	63.2	63,200.00
Matthew Wicker	Director	$1,000	1.5	1,500.00
Kaitlyn Sundt McClarren	Director	$715	0.7	500.50
John Tutty	Senior Vice President	$950	31.2	29,640.00
Thomas G Prince	Senior Vice President	$950	30.3	28,785.00
Christopher Cuomo	Senior Vice President	$910	8.8	8,008.00
Susan Clark	Senior Vice President	$910	84.5	76,895.00
Chase Hood	Senior Vice President	$850	70.0	59,500.00
Claire Allshouse	Vice President	$810	14.6	11,826.00
Lucas Lovatto	Vice President	$835	44.5	37,157.50
Lisa Marie Bonito	Vice President	$580	21.0	12,180.00
Total Hours and Fees for Professionals			**1,172.5**	**$ 1,307,690.50**
Less: 50% Travel Fees				(4,224.75)
Total Fees for Professionals				**$ 1,303,465.75**
Less: 20% Holdback				(260,693.15)
Total Fees for Professionals Less Holdback				**$ 1,042,772.60**
		Average Billing Rate		**$ 1,111.70**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	26.3	$ 30,620.00
1.2	Meetings & Communication with UCC and Creditors	72.8	89,607.00
1.3	Prepare Committee Presentations	29.0	32,334.50
1.5	Mediation and Settlement Communications	1.1	1,147.00
1.7	Liquidity and Cash Management	17.3	17,097.00
1.9	Business and Strategic Plan	346.2	368,358.50
1.11	Financial and Other Diligence	89.6	96,935.00
1.12	Other Motions and Related Objections	13.0	15,043.00
1.13	Litigation Support & Investigations	259.5	314,830.50
1.14	Claims Analysis	33.5	33,005.50
1.15	Valuation and Solvency Analysis	222.6	251,382.50
1.17	RSA, Disclosure Statement & Plan of Reorganization	23.5	25,888.00
1.19	Retention Application & Relationship Disclosures	1.3	1,244.50
1.20	Fee Applications & Fee Statements	23.0	14,888.00
1.22	Intercompany & Waterfall Analysis	6.8	6,860.00
1.31	Travel Time	7.0	4,224.75
	Total Hours and Fees By Matter Category Before Holdback	**1,172.5**	**$ 1,303,465.75**

Average Billing Rate $ 1,111.70

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Expense Category	Amount
Airfare	$ 778.54
Ground Transportation	828.57
Lodging	3,000.00
Meals	514.00
Total Expenses	**$ 5,121.11**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this third monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from November 1, 2025 through November 30, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $1,303,465.75 and reimbursement of out-of-pocket expenses in the amount of $5,121.11 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $1,042,772.60 (80% of $1,303,465.75) and 100% of out-of-pocket expenses in the amount of $5,121.11 for a total amount of $1,047,893.71; and (iii) such other and further relief as this Court deems proper.

Dated: December 18, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	KBM	Review case updates and next steps	0.4
11/04/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	DM	Review agenda for internal meeting re: ModivCare work plan and strategy	0.2
11/04/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	JA	Draft agenda items and workstream updates tracker for discussion with team	1.0
11/04/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/06/2025	CH	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/11/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/11/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	DM	Review agenda for internal discussion re: ModivCare work plan and strategy	0.2
11/11/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	JA	Draft key workstreams for upcoming diligence areas re depositions and outstanding diligence requests	0.6
11/11/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/18/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	DM	Review agenda for internal discussion re: ModivCare work plan and strategy	0.2

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Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	JA	Draft key workstream tracker and identify of update to priority deliverables	0.5
11/18/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.5
11/18/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/28/2025	JA	Update to workplan for key milestones and prepare summary	1.0
Total Professional Hours			**26.3**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.7	$	3,942.00
Kathryn B McGlynn	$1,415	2.4		3,396.00
Greg Magrisi	$1,250	2.1		2,625.00
Christopher Rubel	$1,225	1.3		1,592.50
Johnny Lee	$1,225	2.1		2,572.50
Ashutosh Panda	$1,150	2.1		2,415.00
Joel Amico	$1,150	5.2		5,980.00
Matthew D Gates	$1,120	0.8		896.00
Ryan Komendowski	$1,080	2.1		2,268.00
Thomas G Prince	$950	2.1		1,995.00
Christopher Cuomo	$910	0.8		728.00
Chase Hood	$850	2.6		2,210.00
Total Professional Hours and Fees		**26.3**	**$**	**30,620.00**

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/04/2025	AP	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	CC	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	CR	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	DM	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	DM	Review emails with attachment from D. Litz, C. Shore (W&C), J. Amico re: ModivCare insurance policy renewals.	0.4
11/04/2025	GM	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	JA	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	JL	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.8
11/04/2025	MB	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	RK	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/05/2025	DM	Attend discussion with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, G. Magrisi (AlixPartners) re: expert report	0.5
11/05/2025	DM	Attend discussion with D. Rowe (Jupiter), C. Shore, S. Greissman, A. Zatz (W&C) re: ModivCare strategy	0.5
11/05/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare LC's analysis	0.3
11/05/2025	DM	Emails with A. Zatz, E. Smith (W&C), J. Amico and J. Lee re: ModivCare claims analysis	0.3
11/05/2025	GM	Attend discussion with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, G. Magrisi (AlixPartners) re: expert report	0.5
11/06/2025	AP	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	AP	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	CH	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	CH	Review update from counsel re: deposition summaries	0.4
11/06/2025	DM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	DM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	DM	Review email from A. Chase re: summary and analysis of Gutierrez deposition	0.2
11/06/2025	GM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	GM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	JA	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	JA	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	JL	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	KBM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	KBM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	MDG	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	MDG	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	RK	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	MDG	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/07/2025	CR	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	DM	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	DM	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	DM	Emails with C. Shore and E. Smith (W&C) re: Magrisi report	0.3
11/07/2025	DM	Review email with attachment from A. Hong (W&C) re: summary and analysis of Kern deposition	0.2
11/07/2025	GM	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	GM	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	JA	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	JL	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	KBM	Review case updates from Committee Counsel	0.6
11/07/2025	MB	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	RK	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/08/2025	DM	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	DM	Emails with attachments with E. Smith (W&C), J. Amico and A. Panda re: ModivCare projections	0.6
11/08/2025	DM	Emails with attachments with E. Smith (W&C), R. Komendowski, G. Magrisi re: ModivCare projection's discrepancies	0.5
11/10/2025	DM	Review Magrisi report re: revenue opportunities	0.3
11/10/2025	DM	Discussion with J. Zakia (W&C) re: Magrisi report	0.2
11/11/2025	AP	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	DM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare uptier complaint	0.2
11/11/2025	DM	Review email with attachment from L. Miranda (W&C) re: D. Silvers report	0.6
11/11/2025	GM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	JA	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	JL	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	KBM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	RK	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/12/2025	DM	Emails with attachment with J. Zakia (W&C), D. MacGreevey, G. Magrisi, E. Kardos and R. Komendowski re: ModivCare expert report reliance materials	0.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/12/2025	DM	Emails with S. Greissman (W&C) re: analysis of market for LME's from 2020 to 2025	0.4
11/12/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/12/2025	KBM	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/12/2025	KBM	Review case updates from Committee Counsel and next steps	0.6
11/13/2025	AP	Participate in a call with G. Magrisi, A. Panda (AlixPartners) and Jason Zakia (W&C) re: business plan expert rebuttal report deposition	2.0
11/13/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	DM	Attend discussion with A. Zatz, A. Chase, L. Miranda (W&C) re: ModivCare uptier analysis	0.6
11/13/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	DM	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/13/2025	DM	Prepare talking points and issues list re: work plan and strategy for calls with ModivCare UCC and W&C	0.7
11/13/2025	GM	Participate in a call with G. Magrisi, A. Panda (AlixPartners) and Jason Zakia (W&C) re: business plan expert rebuttal report deposition	2.0
11/13/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	JA	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/18/2025	AP	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	CR	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	DM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	GM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	JA	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	KBM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	RK	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/19/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare testimony preparation	0.2
11/19/2025	KBM	Review case updates from Committee Counsel	0.4
11/20/2025	CH	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	CH	Call with V. Sachdev (W&C), J. Amico and C. Hood (AlixPartners) re: claims analysis	0.3
11/20/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	DM	Discussion with ModivCare UCC members re: case strategy	0.3
11/20/2025	DM	Emails with counsel to individual ModivCare UCC member re: concerns about post petition payment practices	0.2
11/20/2025	DM	Prepare for meetings with W&C and ModivCare UCC re: weekly updates and case strategies	0.5
11/20/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/21/2025	CH	Draft email to V. Sachdev (W&C) re: claims analysis by entity	1.1
11/21/2025	CH	Email correspondence with A. Zatz (W&C) re: operating cash receipts to date	0.3
11/21/2025	DM	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/21/2025	DM	Review email from L. Miranda re: summary of status conference	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/21/2025	JA	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/21/2025	JL	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/23/2025	CH	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/23/2025	JA	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/23/2025	RK	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/24/2025	CH	Call with J. Amico, C. Hood (AlixPartners), A. Zatz and others (W&C) re: unsecured claims analysis	0.4
11/24/2025	CH	Email correspondence with V. Sachdev (W&C) re: unsecured claims estimate	0.8
11/25/2025	AP	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	AP	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	AP	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	CH	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	CH	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	CH	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	DM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	DM	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	DM	Discussion with J. Zakia (W&C) re: debrief Magrisi deposition	0.2
11/25/2025	GM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	GM	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/25/2025	JA	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	JA	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	JA	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	KBM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	KBM	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	RK	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	RK	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	RK	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
Total Professional Hours			**72.8**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	17.7	$	25,842.00
Kathryn B McGlynn	$1,415	7.2		10,188.00
Marc Brown	$1,415	1.4		1,981.00
Greg Magrisi	$1,250	7.8		9,750.00
Christopher Rubel	$1,225	1.9		2,327.50
Johnny Lee	$1,225	3.5		4,287.50
Ashutosh Panda	$1,150	7.1		8,165.00
Joel Amico	$1,150	9.1		10,465.00
Matthew D Gates	$1,120	2.0		2,240.00
Ryan Komendowski	$1,080	6.4		6,912.00
Christopher Cuomo	$910	0.9		819.00
Chase Hood	$850	7.8		6,630.00
Total Professional Hours and Fees		**72.8**	**$**	**89,607.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	CH	Draft materials for upcoming Committee meeting re: liquidity and operations reporting	1.4
11/04/2025	MDG	Review presentation to Committee on claims	1.3
11/05/2025	CH	Draft updates to presentation for UCC covering claims analysis to incorporate comments from D. MacGreevey (AlixPartners)	1.6
11/05/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/05/2025	DM	Review revised draft presentation to ModivCare UCC re: preliminary claims analysis	0.4
11/05/2025	DM	Review, revise and comments on draft presentation to ModivCare UCC re: preliminary claims analysis	1.5
11/05/2025	JA	Draft materials for Committee meeting re case developments, liquidity other topics	1.5
11/05/2025	KBM	Review weekly Committee update presentation	0.6
11/05/2025	MDG	Review analysis of claims	2.0
11/06/2025	JA	Prepare materials for committee meeting	0.5
11/06/2025	MDG	Prepare for oral presentation of claims analysis	1.0
11/10/2025	CH	Draft materials for upcoming Committee meeting re: liquidity and operations reporting	1.3
11/11/2025	CH	Draft materials for upcoming Committee call re: revised DIP budget and liquidity	1.4
11/11/2025	CH	Draft updates to DIP budget and liquidity presentation to incorporate comments from J. Amico (AlixPartners)	1.3
11/12/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/12/2025	JA	Draft update materials for UCC Committee meeting	1.8
11/13/2025	JA	Draft edits to committee presentation materials	0.5
11/13/2025	KBM	Review weekly Committee update presentation	0.7
11/17/2025	CH	Draft materials for weekly Committee meeting covering liquidity and operations update	1.4
11/18/2025	JA	Prepare update materials for UCC meeting	1.3
11/19/2025	DM	Review, revise and comments on draft presentation to ModivCare UCC re: weekly updates	0.5
11/19/2025	DM	Provide additional comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/19/2025	JA	Draft Committee materials for upcoming call	0.9
11/20/2025	KBM	Review weekly Committee update presentation	0.6
11/24/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.4
11/24/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.8
11/24/2025	JA	Draft Committee presentation materials	1.0
11/25/2025	JA	Draft revisions to Committee materials	0.5
Total Professional Hours			**29.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.0	$	7,300.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Joel Amico	$1,150	8.0		9,200.00
Matthew D Gates	$1,120	4.3		4,816.00
Chase Hood	$850	9.8		8,330.00
Total Professional Hours and Fees		**29.0**	**$**	**32,334.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	TGP	Analyze potential settlement terms	0.9
11/07/2025	DM	Review emails from S. Greissman re: ModivCare settlement proposal	0.2
Total Professional Hours			**1.1**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.2	$	292.00
Thomas G Prince	$950	0.9		855.00
Total Professional Hours and Fees		**1.1**	**$**	**1,147.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	KBM	Review weekly liquidity updates	0.4
11/03/2025	CH	Review variance and liquidity reporting package for week ended 10/26	0.8
11/03/2025	JA	Analyze cash reporting vs. Plan from Company and prepare diligence questions	0.5
11/08/2025	DM	Emails with attachments to J. Amico re: changes to ModivCare DIP budget	0.6
11/10/2025	CH	Analyze revised DIP budget and related assumptions	1.5
11/10/2025	CH	Draft bridge analysis and related commentary re: overlapping period between first and second revised DIP budgets	1.4
11/10/2025	CH	Draft comparative analysis re: forecasted and actual liquidity	0.7
11/10/2025	CH	Review variance and liquidity reporting package for week ended 11/2	0.6
11/11/2025	CH	Analyze liquidity bridge analysis between filed and revised DIP budget prepared by Debtors	0.9
11/11/2025	CH	Analyze revised emergence cash sources and uses	0.6
11/11/2025	CH	Draft analysis re: bridge between beginning and ending cash in second revised DIP budget	1.6
11/11/2025	CH	Draft diligence questions for FTI re: revised DIP budget and related assumptions	0.5
11/11/2025	JA	Review revised DIP forecast and prepare questions	1.0
11/17/2025	CH	Review variance reporting and liquidity package for week ended 11/9	0.9
11/17/2025	JA	Review Debtors liquidity and post petition vendors payments status	0.7
11/20/2025	JA	Review latest liquidity forecast and emergence cash details	1.1
11/24/2025	CH	Review variance and liquidity reporting package for week ended 11/16	0.8
11/25/2025	JA	Analyze emergence liquidity under various scenarios	1.2
11/26/2025	JA	Analyze liquidity outlook	1.5
Total Professional Hours			**17.3**

AlixPartners

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Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.6	$	876.00
Kathryn B McGlynn	$1,415	0.4		566.00
Joel Amico	$1,150	6.0		6,900.00
Chase Hood	$850	10.3		8,755.00
Total Professional Hours and Fees		**17.3**	**$**	**17,097.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
11/03/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.1
11/03/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
11/03/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.9
11/03/2025	GM	Conduct Business Plan and CapEx analysis and materials review	1.0
11/03/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	JA	Review business plan assessment report and provide comments	1.1
11/03/2025	JL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	JL	Revise report on business plan	2.0
11/03/2025	KBM	Review draft business plan report	1.4
11/03/2025	LL	Conduct further research about historical trends and future projections for PCS Medicaid reimbursement rates to assess financial impact and inform operational planning.	2.0
11/03/2025	LL	Finalize analysis of provider mix-shift to rideshare and its contribution to service expense cost savings.	2.8
11/03/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	SC	Revise materials for expert report, re: Business Plan workstream	2.7
11/03/2025	TGP	Analyze the Debtors' revenue projections	1.2
11/04/2025	AP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	AP	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.1
11/04/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.2
11/04/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.5
11/04/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.9
11/04/2025	CC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	CC	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	CC	Review business plan draft in advance of call with W&C	0.9
11/04/2025	GM	Review Business Plan and CapEx analysis and materials review	1.0
11/04/2025	IN	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/04/2025	JL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	JL	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	JL	Revise report on business plan	1.8
11/04/2025	LL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	LL	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.2
11/04/2025	LL	Prepare executive summary highlighting findings, sensitivities, and risk considerations for legal review.	2.5
11/04/2025	LL	Review top customer contracts re: contact center required service levels.	2.3
11/04/2025	LL	Update remaining models and report pages re: revised labor burden rate received from Debtors.	1.5
11/04/2025	SC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	SC	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	SC	Research benchmarks for expert report, re: Business Plan workstream	1.2
11/04/2025	SC	Revise materials for expert report, re: Business Plan workstream	2.4
11/04/2025	TGP	Analyze the Debtors' cost projections	1.1
11/04/2025	TGP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/05/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
11/05/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.6
11/05/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.3
11/05/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.6
11/05/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	DM	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Magrisi Expert Report	0.3
11/05/2025	DM	Review and comments on draft Magrisi report	1.2
11/05/2025	ESK	Review and revise Magrisi Expert Report	2.3
11/05/2025	ESK	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Magrisi Expert Report	0.3
11/05/2025	GM	Review Business Plan and CapEx analysis and materials review	1.1
11/05/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	JA	Review and provide comments on business plan assessment	0.6
11/05/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	JL	Revise report on business plan	1.4
11/05/2025	LL	Finalize business plan evaluation report for service expense and PCS sections, ensuring alignment between narrative, exhibits, and model outputs.	2.0
11/05/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	LL	Update PCS branch organization design section with revised role mapping and consolidation savings estimates.	1.5
11/05/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	SC	Research benchmarks for expert report, re: Business Plan	2.6
11/05/2025	SC	Review materials for expert report around benchmarking, re: Business Plan	1.6
11/05/2025	SC	Revise materials for expert report, re: Business Plan	2.7
11/05/2025	TGP	Analyze the Debtors' financial projections under various cost scenarios	1.9
11/06/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.9
11/06/2025	AP	Finalize EBITDA upside scenarios re: AlixPartners business plan expert report	2.0
11/06/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
11/06/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.2
11/06/2025	ESK	Revise Expert Report	1.6
11/06/2025	ESK	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Expert Report	0.4
11/06/2025	GM	Review Business Plan and CapEx analysis	1.2
11/06/2025	GM	Review materials for Business Plan and CapEx analysis	1.8
11/06/2025	JL	Revise report on business plan	1.2
11/06/2025	LL	Review report formatting, citations, and supporting schedules for consistency and professional presentation.	2.0
11/06/2025	SC	Create back-up materials to supplement expert report, re: Business Plan	2.8
11/06/2025	SC	Research industry benchmarks for back-office functions for expert report, re: Business Plan	1.8
11/06/2025	SC	Review benchmarks and materials for expert report, re: Business Plan	0.9
11/06/2025	SC	Revise materials around benchmarking for expert report, re: Business Plan	2.6
11/06/2025	TGP	Analyze the Debtors' financial projections under various cost scenarios	1.8
11/07/2025	CC	Create questions in advance of deposition with ModivCare management	0.9
11/07/2025	ESK	Revise Expert Report	0.2
11/07/2025	GM	Review Business Plan and CapEx analysis	3.0
11/07/2025	GM	Review materials for Business Plan and CapEx analysis	1.5
11/07/2025	GM	Meeting with G. Magrisi, L Lovatto (AlixPartners) re: review Business Plan	0.1
11/07/2025	GM	Call with G. Magrisi, S Clark (AlixPartners) re: review Business Plan assessment	0.2
11/07/2025	JA	Review latest draft of business plan assessment and provide follow up diligence requests	0.9
11/07/2025	JL	Revise report on business plan	1.5
11/07/2025	KBM	Review updates re: business plan expert report	0.4
11/07/2025	LL	Meeting with G. Magrisi, L Lovatto (AlixPartners) re: review Business Plan	0.1

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11/07/2025	LL	Update value tracker to reflect refined run-rate savings, cost to achieve and implementation timeline.	1.0
11/07/2025	RK	Review business plan rebuttal report for valuation analysis inputs.	2.4
11/07/2025	RK	Update valuation analysis for LC assumptions.	1.2
11/07/2025	SC	Call with G. Magrisi, S Clark (AlixPartners) re: review Business Plan assessment	0.2
11/07/2025	SC	Research additional benchmarks, industry trends, and data points to support expert report, re: Business Plan	2.9
11/07/2025	SC	Revise materials for expert report, re: Business Plan	2.6
11/07/2025	TGP	Analyze the Debtors' financial projections under various revenue and cost scenarios	1.6
11/08/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.9
11/08/2025	AP	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.8
11/08/2025	CC	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	CC	Prepare analysis of actual versus guidance for revenue and adjusted EBITDA	2.8
11/08/2025	CC	Respond to email from E. Smith of W&C re: report edits	0.2
11/08/2025	GM	Review Business Plan and CapEx analysis	1.0
11/08/2025	GM	Review materials for Business Plan and CapEx analysis	1.6
11/08/2025	GM	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	KBM	Review updates re: business plan expert report	0.6
11/09/2025	GM	Review Business Plan and CapEx analysis and materials review	1.7
11/10/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.1
11/10/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
11/10/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.8
11/10/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	DM	Emails with J. Amico re: ModivCare Georgia contract	0.2
11/10/2025	ESK	Email to/from D. MacGreevey (AlixPartners) re: finalization and execution of the Expert Report	0.3
11/10/2025	ESK	Review final Expert Report	0.5
11/10/2025	GM	Discussion with D. MacGreevey, G. Magrisi (AlixPartners) re: Magrisi report	0.2
11/10/2025	GM	Review Business Plan and CapEx analysis and materials review	7.0
11/10/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	JL	Finalize review/edits of business plan report in preparation for submission	1.6
11/10/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.6

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11/10/2025	KBM	Review final business plan expert report	1.1
11/10/2025	LL	Analyze corporate, NEMT and PCS real estate leases to assess opportunities of footprint optimization.	2.8
11/10/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	LL	Review terms and conditions of NEMT customer contracts.	2.5
11/10/2025	SC	Prepare back-up support for the G. Magrisi (AlixPartners) expert report re: the Debtors' business plan	2.8
11/10/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	SC	Prepare supporting bullets for findings in expert report, re: Business Plan	2.9
11/10/2025	SC	Update expert report with additional insights and supporting information, re: Business Plan	1.2
11/11/2025	AP	Prepare for deposition of Greg Magrisi re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.5
11/11/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
11/11/2025	LL	Update report to include external sources consulted during research process.	1.5
11/11/2025	SC	Prepare summary of supporting documents in expert report re: Debtors' Business Plan	0.8
11/11/2025	SC	Review deposition transcript for B. Gutierrez	2.7
11/11/2025	SC	Review deposition transcript for S.Kern	2.6
11/12/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	AP	Prepare for deposition of Greg Magrisi (AlixPartners) re: operating cost opinions re: AlixPartners business plan rebuttal report	2.9
11/12/2025	AP	Prepare for deposition of Greg Magrisi (AlixPartners) re: revenue opinions re: AlixPartners business plan rebuttal report	2.9
11/12/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
11/12/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	ESK	Emails re: expert report	0.2
11/12/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.0
11/12/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	LL	Review open business plan questions	0.3
11/12/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	SC	Review deposition transcript for K. Shepard	2.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/13/2025	AP	Prepare for deposition of Greg Magrisi on operating cost opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	2.8
11/13/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	2.6
11/13/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.1
11/13/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.5
11/13/2025	LL	Analyze earnings calls transcripts from 2022 to Q1 2025.	2.0
11/13/2025	SC	Prepare supporting points in expert report, re: Business Plan	1.9
11/13/2025	SC	Review deposition transcripts, B. Guitierrez, S. Kern	1.8
11/13/2025	SC	Research historical Debtor financial reporting to support expert report	1.8
11/13/2025	SC	Review support materials for expert report, re: Business Plan	2.0
11/13/2025	TGP	Review Magrisi report	0.8
11/14/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	AP	Prepare for deposition of Greg Magrisi on operating cost opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.1
11/14/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.3
11/14/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/14/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	LL	Researched and analyzed historical NEMT Medicaid reimbursement rate for NEMT across states.	3.0
11/17/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.6
11/17/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.5
11/17/2025	SC	Prepare for deposition, re: Business Plan diligence	2.4
11/18/2025	AP	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	AP	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	AP	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	AP	Prepare for deposition of Greg Magrisi on capex opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.5
11/18/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
11/18/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/18/2025	GM	Participate in a call with G. Magrisi and S. Clark (AlixPartners), re: Business Plan diligence	1.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	GM	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	GM	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	GM	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Prepared supplementary document re: methodology per request from Debtors' counsel.	1.5
11/18/2025	RK	Prepare confirmation rejection objection analyses.	2.8
11/18/2025	SC	Participate in a call with G. Magrisi and S. Clark (AlixPartners), re: Business Plan diligence	1.4
11/18/2025	SC	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	SC	Prepare for deposition, re: Business Plan diligence	2.4
11/19/2025	AP	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	AP	Prepare for deposition of Greg Magrisi on cost savings opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.9
11/19/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/19/2025	GM	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	JL	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	LL	Prepare supporting analysis and related files re: approach and methodology per request from Debtors' counsel.	1.2
11/19/2025	SC	Prepare for deposition, re: Business Plan diligence	1.6
11/20/2025	AP	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	AP	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	AP	Prepare for deposition of Greg Magrisi on cost savings opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.5
11/20/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/20/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	GM	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5

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11/20/2025	GM	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	LL	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	LL	Review documents and materials for deposition preparation	0.7
11/20/2025	LL	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	RK	Prepare confirmation objection analysis.	1.7
11/20/2025	RK	Review confirmation objection outline.	3.0
11/20/2025	RK	Review plan supplement for confirmation objection impacts.	1.9
11/20/2025	SC	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	SC	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	SC	Prepare for deposition re: Business Plan diligence	2.6
11/21/2025	AP	Participate in a call with G. Magrisi and A. Panda (AlixPartners) and E. Smith (W&C) re: deposition preparation.	0.5
11/21/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	3.5
11/21/2025	GM	Attend Marc Brown deposition re: valuation expert report	4.0
11/21/2025	GM	Participate in a call with G. Magrisi and A. Panda (AlixPartners) and E. Smith (W&C) re: deposition preparation.	0.5
11/21/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	LL	Review past deposition transcripts and researched follow up topics for deposition preparation.	2.5
11/21/2025	RK	Observation of valuation expert deposition.	4.5
11/21/2025	RK	Review confirmation objection draft.	2.6
11/21/2025	SC	Listen to deposition of M. Brown	2.3
11/21/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	SC	Prepare for deposition, re: Business Plan diligence	1.9
11/22/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.2
11/23/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	4.5
11/23/2025	RK	Review confirmation objection draft.	1.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/24/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
11/24/2025	ESK	Emails with internal team re: expert report issues	0.5
11/24/2025	RK	Observation of Magrisi deposition.	2.8
11/25/2025	AP	Update key assertions and opinions in the confirmation objection draft re: Debtor's business plan forecast and projections	2.9
11/25/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.9
11/25/2025	RK	Review expert rebuttal reports for confirmation objection.	1.9
Total Professional Hours			**346.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Kathryn B McGlynn	$1,415	3.5		4,952.50
Greg Magrisi	$1,250	59.7		74,625.00
Johnny Lee	$1,225	13.5		16,537.50
Elizabeth S Kardos	$950	6.3		5,985.00
Ashutosh Panda	$1,150	98.3		113,045.00
Joel Amico	$1,150	2.6		2,990.00
Iain Nelson	$1,120	0.3		336.00
Ryan Komendowski	$1,080	26.6		28,728.00
Thomas G Prince	$950	8.7		8,265.00
Christopher Cuomo	$910	6.8		6,188.00
Susan Clark	$910	73.7		67,067.00
Lucas Lovatto	$835	44.5		37,157.50
Total Professional Hours and Fees		**346.2**	**$**	**368,358.50**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	DM	Review draft list of priority diligence questions	0.2
11/03/2025	JA	Analyze Debtors underlying financial model and evaluate various working capital requirements	1.5
11/03/2025	JA	Draft diligence questions for upcoming depositions	1.0
11/03/2025	JA	Draft diligence questions re open issues, emergence cash and claims	0.8
11/03/2025	JA	Review data room uploads and reconcile against outstanding questions list	1.0
11/03/2025	JT	Analyze working capital fluctuations from 12/31/25 to 12/31/26 in the company's valuation model	1.9
11/03/2025	KBM	Review updates re: outstanding information requests	0.4
11/03/2025	MDG	Review diligence items needed for lien challenge and update requests for Debtors	1.0
11/04/2025	JA	Analyze various issues re cash collateral, sureties and letters of credit	1.2
11/04/2025	JA	Draft and review of various waterfall scenarios based on different valuation scenarios	1.0
11/04/2025	JA	Draft diligence questions on business plan and certain assumptions on go forward cash requirements for upcoming diligence sessions	1.5
11/04/2025	JA	Review various data room documents re historical financial projections	0.5
11/04/2025	MDG	Analyze historical revenue figures by segment	0.3
11/04/2025	MDG	Update due diligence requests and send to Debtors	0.7
11/05/2025	CH	Review new documents uploaded to virtual data room for responsive documents	1.3
11/05/2025	DM	Review email with attachments from J. Amico re: diligence of ModivCare LC's	0.3
11/05/2025	JA	Analyze various documents re emergence liquidity, insurance and cash collateral	0.7
11/05/2025	JA	Draft questions list for upcoming depositions re business plan, Q1 2025 transactions and liquidity requirements	1.5
11/05/2025	JT	Analyze entity level trial balance for potential claims	0.7
11/05/2025	JT	Review company assumptions related to letters of credit	0.6
11/05/2025	MDG	Review data requests for lien challenge	1.6
11/05/2025	MDG	Update due diligence requests for Debtors	0.6
11/05/2025	TGP	Analyze the Debtors' assets by segment	2.3
11/06/2025	JA	Review documents and prepare proposed questions for upcoming depositions	1.4
11/06/2025	JA	Review various documents re projections per request from W&C	1.0
11/06/2025	JT	Analyze the intercompany matrix as of 7/31/25	1.7
11/06/2025	JT	Summarized outstanding surety bonds and LCs	1.4
11/06/2025	MDG	Review operating metrics file from Debtors	1.0
11/06/2025	TGP	Analyze the Debtors' historical balance sheet changes	1.6
11/07/2025	CH	Review operating metrics for postpetition period	0.7
11/07/2025	CH	Review update from counsel re: S. Kern deposition	0.4
11/07/2025	DM	Prepare diligence questions re: Shepard deposition	0.5
11/07/2025	JA	Analyze various supporting documents re exit financing providers	1.0
11/07/2025	JA	Draft various potential questions for upcoming depositions as well as flagging supporting documents	1.7
11/07/2025	JA	Working session with J. Amico and J. Tutty (AlixPartners) re: analysis of intercompany balances by legal entity	0.6
11/07/2025	JT	Analyze the assets and liabilities at each entity as of August 31	2.8
11/07/2025	JT	Analyze the intercompany balances held by each entity based on the trial balance and intercompany matrix	1.5

AlixPartners

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	JT	Develop a summary of each entity's P&L as of August 31	1.7
11/07/2025	JT	Summarized total and scheduled claims at each entity	1.6
11/07/2025	JT	Working session with J. Amico and J. Tutty (AlixPartners) re: analysis of intercompany balances by legal entity	0.6
11/07/2025	MDG	Analyze operational metrics file and follow up with questions to FTI	0.8
11/07/2025	TGP	Analyze the Debtors change in working capital historically vs. projected	1.8
11/10/2025	CH	Review actuals performance for August and September	1.6
11/10/2025	CC	Research real estate fee applications for J. Amico of AlixPartners	0.3
11/10/2025	JA	Analyze Disclosure Statement projections and reconcile to various components used in valuation materials	1.3
11/10/2025	JA	Analyze proposals related to exit financing and prepare diligence questions	1.0
11/10/2025	JA	Review update on Debtor contract situation and impact on go forward budget	0.5
11/11/2025	CH	Review summary from counsel re: Silvers investigation report	0.3
11/11/2025	DM	Emails with E. Smith, A. Zatz (W&C), B. Marks (Latham), J. Amico re: ModivCare diligence and production of reliance materials	0.2
11/11/2025	JA	Review historical projections changes over time	0.8
11/11/2025	KBM	Review updates re: outstanding diligence requests	0.2
11/11/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/12/2025	DM	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/12/2025	JA	Draft diligence questions for upcoming Debtor depositions (business plan, sale process, liquidity)	1.3
11/12/2025	JA	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/12/2025	JA	Review and provide comments on UCC standing motion draft; follow up with additional diligence requests	1.5
11/12/2025	JA	Review K. Shepard deposition transcript	0.5
11/12/2025	JA	Review various capital structure changes and leverage over time	1.2
11/12/2025	JA	Review various debtor produced materials related to exit financing process	0.6
11/12/2025	RK	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/13/2025	DM	Review 11.12.25 letter from Latham to UST re: ModivCare	0.3
11/13/2025	JA	Review and provide comment on lien challenge and standing motion	1.0
11/13/2025	JA	Review data room for recent documents uploaded, review and summarize	1.2
11/13/2025	JA	Review UCC expert reports to identify areas of further diligence support	1.2
11/13/2025	KBM	Review Debtors' letter to the U.S. Trustee re: settlement phone call between ad hoc group and former board member	0.3
11/13/2025	KBM	Review updates re: outstanding diligence requests	0.3
11/14/2025	JA	Draft questions for upcoming Debtor depositions on business plan and liquidity	1.2
11/14/2025	JA	Prepare debtor diligence list re sources and uses at emergence	1.0
11/14/2025	JA	Review and provide comments on assumptions and calculations in UCC standing motion	0.8
11/14/2025	JA	Review data room re financial projections diligence	0.5
11/17/2025	CH	Review summary from counsel re: D. Gonzales deposition	0.5
11/17/2025	JA	Draft questions and review of related documents for Jamal deposition	1.0

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/17/2025	JA	Draft questions and review of related documents for Shandler deposition	1.5
11/17/2025	JA	Review Debtor and UCC valuation reports and identify methodology differences	1.2
11/18/2025	JA	Analyze exit financing providers and related term sheet proposals	0.5
11/18/2025	JA	Review data room for various projections over time per W&C request	1.0
11/18/2025	JA	Review documents produced and draft of questions for upcoming Debtor depositions	1.3
11/19/2025	JA	Review data room and identify certain projections version per W&C request	0.6
11/19/2025	JA	Review data room and identify supporting documents re uptier transaction and capital structure changes in Q1 2025	1.0
11/19/2025	JA	Review Plan Supplement and analyze contract rejections	1.0
11/19/2025	JA	Review relevant documents and draft questions for Jamal deposition	1.3
11/19/2025	JT	Revised analysis of FY26 NWC projections by balance sheet line item	1.1
11/19/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/20/2025	JA	Analyze various GUC cashout scenarios	0.5
11/21/2025	CH	Draft analysis re: postpetition operating receipts received to date	1.4
11/21/2025	CH	Research re: Matrix JV ownership	0.4
11/21/2025	JA	Analyze legal entity org structure and legal entity trial balance to support UCC motions	0.7
11/21/2025	JA	Review post petition cash generated and other related analysis for W&C	1.2
11/21/2025	JA	Review rights offering calculations	0.5
11/23/2025	JA	Analyze Plan documents and develop supporting scenarios to support Confirmation objection	1.3
11/24/2025	JA	Analyze various settlement proposals and impact on recoveries	0.8
11/24/2025	JA	Revise supporting waterfall analysis under different Plan recoveries	1.3
11/24/2025	JA	Review various claims and causes of action listed re Plan Settlement	0.6
11/25/2025	CH	Analyze scheduled and statement filings re: causes of action identified as assets	0.5
11/25/2025	JA	Draft supporting schedules for various financial statements in Plan objection motion	0.6
11/25/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/26/2025	JA	Analyze insurance related obligations	0.5
Total Professional Hours			**89.6**

AlixPartners

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.9	$	2,774.00
Kathryn B McGlynn	$1,415	1.2		1,698.00
Joel Amico	$1,150	50.8		58,420.00
Matthew D Gates	$1,120	6.0		6,720.00
Ryan Komendowski	$1,080	0.4		432.00
John Tutty	$950	15.6		14,820.00
Thomas G Prince	$950	5.7		5,415.00
Christopher Cuomo	$910	0.3		273.00
Chase Hood	$850	7.1		6,035.00
Lisa Marie Bonito	$580	0.6		348.00
Total Professional Hours and Fees		**89.6**	**$**	**96,935.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	DM	Review ModivCare Debtors' motion for exit financing	0.3
11/05/2025	JA	Review W&C motion and assist with providing various financial inputs	1.5
11/10/2025	JA	Analyze motion to employ real estate advisor and related follow up diligence	0.9
11/10/2025	JA	Review draft of UCC standing motion and provide comments	0.6
11/11/2025	JA	Analyze certain preference actions and other disclosures made in the Statement of Financial Affairs	1.2
11/21/2025	JA	Review confirmation objection draft and provide comments	1.1
11/23/2025	JA	Review and provide comments on confirmation objection and prepare supporting backup	0.8
11/24/2025	JA	Draft supporting financial schedules for Plan objection	1.6
11/24/2025	JA	Review and provide comments on confirmation objection	2.5
11/25/2025	JA	Review and provide comments to Plan objection motion	2.5
Total Professional Hours			**13.0**

AlixPartners

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Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Joel Amico	$1,150	12.7		14,605.00
Total Professional Hours and Fees		**13.0**	**$**	**15,043.00**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	RK	Prepare deposition questions for upcoming former CFO deposition.	2.7
11/03/2025	CR	Analyze post-petition financial information related to revenue and receivables.	0.5
11/03/2025	CR	Assist counsel with preparation for Gutierrez deposition.	1.3
11/03/2025	CR	Meeting with C. West, A. Chase, and L. Miranda (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of uptier transaction	0.4
11/03/2025	DM	Review and add to draft lists of questions for ModivCare management meeting and Guitterez deposition	0.4
11/03/2025	DM	Provide comments on revised draft Magrisi report re: ModivCare business plan	0.7
11/03/2025	JT	Meeting with C. West, A. Chase, and L. Miranda (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of uptier transaction	0.4
11/03/2025	JT	Revise analysis of uptier transaction based on historical pricing data	2.4
11/04/2025	CR	Assist counsel with preparation for Scott Kern deposition.	1.3
11/05/2025	CR	Attend Barbara Gutierrez deposition	2.8
11/05/2025	DM	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	DM	Review draft standing motion re: ModivCare lien challenge	0.8
11/05/2025	ESK	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	GM	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	JT	Draft questions for K. Shepard disposition	0.7
11/05/2025	RK	Preparation and review of deposition questions.	1.8
11/06/2025	CR	Attend Scott Kern deposition	3.0
11/06/2025	DM	Analyze various surety bond and exit financing issues	1.3
11/06/2025	DM	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Expert Report	0.4
11/06/2025	DM	Provide comments on Magrisi report	0.8
11/06/2025	JL	Prepare questions/topics for consideration in management depositions	0.4
11/07/2025	DM	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	DM	Review and comments on Magrisi expert report	3.5
11/07/2025	DM	Review revised Magrisi expert report	0.7
11/07/2025	ESK	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	GM	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	JL	Review and edit questions/topics for deposition	0.5
11/07/2025	MDG	Provide additional information re: lien challenge motion	2.0
11/08/2025	DM	Review C. Shore comments to Magrisi expert report	0.8
11/08/2025	DM	Review email with attachment from G. Magrisi re: draft questions for K. Shepard deposition	0.4
11/09/2025	DM	Review revised Magrisi expert report	1.1
11/10/2025	AP	Attend Ken Shepard deposition	2.9
11/10/2025	CR	Attend the deposition of Ken Shepard	8.0
11/10/2025	DM	Discussion with D. MacGreevey, G. Magrisi (AlixPartners) re: Magrisi report	0.2

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	DM	Emails with E. Kardos and G. Magrisi (AlixPartners) re: distribution of Magrisi report	0.3
11/10/2025	DM	Review and comments on M. Brown report re: ModivCare valuation	1.2
11/10/2025	DM	Review and comments on Magrisi expert report re: ModivCare business plan	1.6
11/10/2025	DM	Review Magrisi expert ModivCare report for expenses discussion	0.5
11/10/2025	GM	Attend Ken Shepard deposition	2.5
11/10/2025	JA	Attend Ken Shepard deposition	2.5
11/11/2025	AP	Attend Heath Sampson, CEO of Modivcare deposition	5.0
11/11/2025	CR	Attend Heath Sampson, CEO of Modivcare deposition	3.0
11/11/2025	JA	Attend Heath Sampson, CEO of Modivcare deposition	2.3
11/11/2025	JT	Correspond with D. Litz (W&C) re: make whole event	0.4
11/11/2025	JT	Develop an estimate for the total cost of triggering the Make-Whole Event of the credit agreement	0.7
11/11/2025	JT	Develop charts to summarize historical trading prices of the company's unsecured notes	0.6
11/11/2025	RK	Prepare questions for upcoming depositions.	1.7
11/12/2025	CH	Review draft motion lien challenge standing motion and related complaint	1.2
11/12/2025	CR	Analyze market data related to uptier collateral valuation.	1.8
11/12/2025	CR	Uptier damages analysis for draft complaint and standing motion.	1.7
11/12/2025	DM	Analyze market for LME’s from 2020 to 2025 re: ModivCare uptier	2.0
11/12/2025	JT	Correspond with E. Smith (W&C) re: unsecured notes	0.3
11/12/2025	JT	Review the company's Q1 2025 10-Q filing for disclosures re: incremental term loan proceeds	0.5
11/12/2025	JT	Revised chart to summarize trading prices of the 2L notes	0.6
11/12/2025	JT	Revised chart with the company's debt balances as of the uptier transaction and petition dates	0.9
11/12/2025	TGP	Review transcript of K. Sheppard deposition	0.7
11/13/2025	CR	Attend Daniel SIlvers deposition	8.0
11/13/2025	DM	Review draft UCC standing motion and complaint re: ModivCare lien challenge	0.9
11/13/2025	JA	Attend Daniel SIlvers deposition	2.0
11/13/2025	JT	Corresponded with D. Kiyosaki (FTI) re: Wells Fargo control account	0.3
11/13/2025	JT	Corresponded with L. Miranda (W&C) re: proceeds from incremental term loan	0.3
11/13/2025	JT	Review files related to incremental term loan for detail on the Wells Fargo controlled account	1.1
11/13/2025	JT	Review sources and uses excel detail of proceeds from the incremental term loan	0.4
11/13/2025	KBM	Review litigation related updates	0.4
11/13/2025	TGP	Review draft lien challenge complaint	0.6
11/13/2025	TGP	Review draft lien challenge standing motion	0.7
11/14/2025	AP	Attend David Mounts Gonzales deposition	5.8
11/14/2025	CR	Prepare analysis re: counsel (W&C) requests related to uptier valuation in connection with related standing motion and complaint.	1.7
11/14/2025	CR	Attend David Mounts Gonzales deposition	5.0
11/14/2025	CR	Review draft complaint and standing motion related to uptier challenge.	1.3
11/14/2025	DM	Attend David Mounts Gonzales deposition	4.9
11/14/2025	DM	Review standing motion and complaint	0.3

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/14/2025	DM	Review 11.13.25 letter from AI Catalyst to UST	0.2
11/14/2025	DM	Review and comments on draft questions for Jamal and Shandler depositions	0.3
11/14/2025	DM	Review draft standing motion and complaint re: ModivCare uptier transaction	0.6
11/14/2025	JA	Attend David Mounts Gonzales deposition	2.0
11/14/2025	KBM	Review UCC lien challenge adversary complaint	0.9
11/14/2025	KBM	Review UCC's lien challenge standing motion	1.1
11/17/2025	AP	Attend Kevin Glodowski, First Lien Holders deposition	5.8
11/17/2025	CR	Assist counsel (W&C) with diligence requests in preparation for the Jamal (Moelis) deposition.	1.5
11/17/2025	CR	Assist counsel (W&C) with diligence requests in preparation for the Shandler (FTI) deposition.	1.8
11/17/2025	CR	Listen to Leslie Norwalk (Board member) deposition	3.8
11/17/2025	DM	Attend Kevin Glodowski, First Lien Holders deposition	5.2
11/17/2025	DM	Review emails with B. Marks (Latham), J. Zakia, C. Shore (W&C), J. Amico and G. Magrisi re: Magrisi reliance materials	0.3
11/17/2025	JA	Attend Leslie Norwalk (Board member) deposition	1.4
11/17/2025	JA	Attend Kevin Glodowski, First Lien Holders deposition	1.2
11/18/2025	CR	Assist counsel (W&C) with preparation for M. Brown (AlixPartners) deposition.	1.8
11/18/2025	CR	Draft discussion topics for counsel in connection with Jamal (Moelis) deposition preparation.	1.8
11/18/2025	CR	Draft analysis re: Q1-2025 uptier transactions.	2.3
11/19/2025	AP	Attend Chad Shandler (FTI), CTO deposition	5.8
11/19/2025	CR	Assist counsel (W&C) with preparation of outline for Jamal (Moelis) deposition.	1.8
11/19/2025	CR	Listened to Chad Shandler (FTI) deposition.	3.0
11/19/2025	CR	Listened to Chad Shandler (FTI) deposition.	3.5
11/19/2025	DM	Partial attendance at deposition of C. Shandler (FTI) as ModivCare 30b6 witness	2.2
11/19/2025	DM	Review 11.18.25 letters from W&C to Quinn and Latham	0.4
11/19/2025	JA	Participate in the Shandler deposition	1.2
11/20/2025	AP	Attend Zul Jamal Moelis deposition	2.9
11/20/2025	CR	Financial analysis related to standing motion and complaint.	1.5
11/20/2025	CR	Listened to Zul Jamal (Moelis) deposition.	3.5
11/20/2025	CR	Listened to Zul Jamal (Moelis) deposition.	3.0
11/20/2025	DM	Partial attendance at deposition of Z. Jamal (Moelis) as ModivCare 30b6 witness	4.4
11/20/2025	JA	Attend Zul Jamal Moelis deposition	1.5
11/20/2025	JL	Continue participation in G. Magrisi deposition prep	1.4
11/20/2025	JL	Attend Zul Jamal Moelis deposition	1.3
11/21/2025	AP	Attend Marc Brown deposition re: valuation expert report	8.0
11/21/2025	CR	Assist counsel (W&C) with M. Brown (AlixPartners) deposition preparation.	2.0
11/21/2025	CR	Attend Marc Brown deposition re: valuation expert report	6.0
11/21/2025	MB	Participate in Marc Brown deposition re: valuation expert report	6.4
11/21/2025	RK	Update recovery analysis scenarios for confirmation objection.	0.9
11/21/2025	SC	Attend Marc Brown deposition re: valuation expert report	2.8
11/22/2025	RK	Update recovery analysis scenarios for confirmation objection.	2.6
11/22/2025	RK	Continue to update recovery analysis scenarios for confirmation objection.	2.7
11/24/2025	AP	Attend Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/24/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.5
11/24/2025	GM	Participate in Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.5
11/24/2025	JL	Attend Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.1
11/24/2025	KBM	Review supplement to lien support challenge	0.3
11/24/2025	SC	Attend deposition of Greg Magrisi	8.0
11/25/2025	AP	Review transcript of deposition of Greg Magrisi (AlixPartners) re: Magrisi analyses and opinions in the Magrisi rebuttal report on Debtors' business plan and projections	1.4
11/25/2025	DM	Attend D. Rowe (Jupiter) deposition	0.2
11/25/2025	DM	Review revised draft ModivCare confirmation objection	0.8
11/26/2025	AP	Attend David Mounts Gonzalez, former Modivcare Board member deposition	2.5
11/26/2025	AP	Review transcript of deposition of Greg Magrisi (AlixPartners) re: analyses and opinions in the Magrisi rebuttal report on Debtors' business plan and projections	2.9
11/26/2025	AP	Review transcripts from deposition of Marc Brown (AlixPartners), Chad Shandler (FTI), Ken Shepard (ModivCare), and Heath Sampson(ModivCare) re: Debtors' business plan and projections, Q1 transactions, and rebuttal of Debtors' valuation expert report	2.9
11/26/2025	DM	Discussion with M. Jacques re: prior work with Mounts Gonzales	0.2
11/26/2025	DM	Partial attendance at continued deposition of David Mounts Gonzales	1.1
Total Professional Hours			**259.5**

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Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	40.9	$	59,714.00
Kathryn B McGlynn	$1,415	2.7		3,820.50
Marc Brown	$1,415	6.4		9,056.00
Greg Magrisi	$1,250	13.7		17,125.00
Christopher Rubel	$1,225	77.1		94,447.50
Johnny Lee	$1,225	10.7		13,107.50
Elizabeth S Kardos	$950	2.2		2,090.00
Ashutosh Panda	$1,150	53.7		61,755.00
Joel Amico	$1,150	14.1		16,215.00
Matthew D Gates	$1,120	2.0		2,240.00
Ryan Komendowski	$1,080	12.4		13,392.00
John Tutty	$950	9.6		9,120.00
Thomas G Prince	$950	2.0		1,900.00
Susan Clark	$910	10.8		9,828.00
Chase Hood	$850	1.2		1,020.00
Total Professional Hours and Fees		**259.5**	**$**	**314,830.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	MDG	Analyze claims data and related analysis	1.7
11/03/2025	TGP	Analyze the Debtors' claims pool	1.1
11/05/2025	CH	Draft correspondence to D. MacGreevey (AlixPartners) re: claims analysis and related assumptions	0.8
11/05/2025	CH	Draft updates to claims analysis to incorporate comments from D. MacGreevey (AlixPartners)	1.9
11/05/2025	CH	Review individual claim filings in connection with revised claims analysis	1.1
11/05/2025	JA	Analyze claims filed, scheduled and related analysis	1.2
11/05/2025	JL	Review claim filings and research background of claim amounts for large claims	0.8
11/05/2025	KBM	Review updates re: claims and waterfall analysis	0.4
11/05/2025	TGP	Analyze the Debtors' claims pool	1.3
11/06/2025	CH	Analyze proposed contract cure cost and related estimated claims	1.7
11/06/2025	CH	Convert contract assumption and cure cost schedule to excel format	0.8
11/07/2025	JA	Review intercompany matrix and various claims	1.3
11/10/2025	JA	Analyze various unsecured claims filed in case	1.0
11/14/2025	JA	Review various unsecured claims filed and scheduled and diligence of GUC claims analysis	1.0
11/18/2025	JA	Analyze filed claims, scheduled claims and debtors claims analysis to determine GUC pool	1.3
11/19/2025	CH	Analyze contract rejection schedule and related claims exposure	1.8
11/20/2025	CH	Analyze contract and customer claims by Debtor entity	1.1
11/20/2025	CH	Analyze litigation claims by Debtor entity	1.5
11/20/2025	CH	Analyze trade claims by Debtor entity	1.8
11/20/2025	CH	Call with J. Amico and C. Hood (AlixPartners) re: claims analysis	0.5
11/20/2025	JA	Call with J. Amico and C. Hood (AlixPartners) re: claims analysis	0.5
11/20/2025	JA	Call with V. Sachdev (W&C), J. Amico and C. Hood (AlixPartners) re: claims analysis	0.3
11/20/2025	JA	Review claims register and perform analysis of GUC claims	1.0
11/21/2025	CH	Analyze revised claims register received from Verita for new and updated claims	1.6
11/21/2025	KBM	Review updates re: GUC claims pool	0.4
11/23/2025	CH	Analyze 2L claim components	0.4
11/23/2025	JA	Analyze various claims estimates and reconciliations for UCC objection	1.1
11/24/2025	CH	Draft analysis re: unsecured claims for voting purposes	1.7
11/24/2025	JA	Analyze general unsecured claims estimate and range of outcomes under the cash out option	0.6
11/24/2025	JA	Call with J. Amico, C. Hood (AlixPartners), A. Zatz and others (W&C) re: unsecured claims analysis	0.4
11/24/2025	KBM	Review updated GUC analysis	0.3
11/25/2025	CH	Draft updates to claims analysis to incorporate claims objections to date	0.7
11/25/2025	CH	Review first omnibus claim objection filed	0.4
Total Professional Hours			**33.5**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	1.1	$	1,556.50
Johnny Lee	$1,225	0.8		980.00
Joel Amico	$1,150	9.7		11,155.00
Matthew D Gates	$1,120	1.7		1,904.00
Thomas G Prince	$950	2.4		2,280.00
Chase Hood	$850	17.8		15,130.00
Total Professional Hours and Fees		**33.5**	**$**	**33,005.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	MW	Review warrant valuation methodology/calculations.	1.0
11/03/2025	CR	Draft and reviewed valuation expert report.	1.8
11/03/2025	JA	Review and provide comments on valuation expert report	1.0
11/03/2025	KBM	Review draft valuation report	0.9
11/03/2025	MB	Analyze Jamal report	2.1
11/03/2025	MR	Perform analysis of ModivCare valuation metrics over time.	2.8
11/03/2025	MR	Perform analysis of public company credit metrics for ModivCare valuation.	2.6
11/03/2025	RK	Review debtors plan documentation for waterfall analysis.	2.7
11/03/2025	RK	Sensitize waterfall analysis for counsel questions.	1.3
11/04/2025	CR	Draft and reviewed valuation expert report.	1.8
11/04/2025	DM	Review and comments on Brown ModivCare expert report	0.8
11/04/2025	JT	Prepare historical debt pricing data for company peers	0.8
11/04/2025	JT	Develop a summary of the identified difference in FY26 use of net working capital within the company's valuation model	2.4
11/04/2025	JT	Revised slides in valuation model deck based on comments received	2.8
11/04/2025	MB	Analyze Jamal report	1.7
11/04/2025	MB	Conducted valuation analysis	2.6
11/04/2025	MB	Review industry research	0.9
11/04/2025	MR	Edit analysis of ModivCare cost of capital.	1.7
11/04/2025	MR	Prepare draft expert report re: ModivCare valuation.	2.5
11/04/2025	MW	Analyze warrant valuation methodology and calculations	0.5
11/04/2025	RK	Prepare expert rebuttal report of valuation.	3.0
11/04/2025	RK	Review document produced for valuation analysis.	2.6
11/05/2025	CR	Review and drafted valuation expert report.	1.2
11/05/2025	CA	Perform review and quality control analysis of discounted cash flow analysis	0.6
11/05/2025	CA	Perform review and quality control analysis of guideline company method valuation analysis and underlying data	2.2
11/05/2025	CA	Perform review and quality control analysis of guideline transaction method valuation analysis and underlying data	2.5
11/05/2025	MB	Draft expert report	0.9
11/05/2025	MB	Review liquidation analysis	0.4
11/05/2025	MR	Perform quality review of draft expert report re: ModivCare valuation.	2.9
11/05/2025	RK	Review business plan rebuttal report.	2.1
11/06/2025	CR	Review and drafted valuation expert report.	1.7
11/06/2025	CA	Perform review and quality control analysis of weighted-average cost of capital analysis	0.9
11/06/2025	CA	Prepare list of documents considered in valuation report	0.8
11/06/2025	DM	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	DM	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	JA	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	JA	Draft supporting slides for surety and cash collateral re valuation materials	1.2

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	JA	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	MB	Draft valuation report	2.2
11/06/2025	MB	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	MR	Perform quality review of ModivCare valuation analysis.	2.1
11/06/2025	MR	Perform research re: healthcare industry trends for ModivCare valuation analysis.	0.9
11/06/2025	MR	Prepare draft expert report re: ModivCare valuation.	1.7
11/06/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	RK	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	RK	Review underlying LC assumptions used to support the Moelis recovery analysis.	2.4
11/07/2025	CA	Perform review and quality control of valuation expert report	2.3
11/07/2025	CA	Review the Jamal report and other referenced materials in valuation expert report	1.8
11/07/2025	JA	Review and provide comments on revised valuation materials	1.2
11/07/2025	KBM	Review updates re: valuation expert report	0.4
11/07/2025	MB	Draft valuation report	1.1
11/07/2025	MB	Review business plan report	2.1
11/07/2025	MB	Review valuation analysis	1.9
11/07/2025	MR	Perform quality review of ModivCare valuation analysis.	0.9
11/07/2025	MR	Prepare draft expert report re: ModivCare valuation.	2.0
11/07/2025	RK	Analyze letters of credit and surety bonds for recovery analysis.	2.0
11/07/2025	RK	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	RK	Update recovery analysis rebuttals for adjustments to valuation analysis.	2.2
11/08/2025	MB	Draft valuation report	1.1
11/08/2025	RK	Prepare expert rebuttal report for valuation analysis.	2.5
11/08/2025	RK	Sensitize recovery analysis for counsel assumptions.	2.7
11/09/2025	KBM	Review updates re: valuation expert report	0.4
11/09/2025	RK	Finalize valuation analysis for rebuttal report.	1.2
11/09/2025	RK	Prepare rebuttal report exhibits.	1.8
11/09/2025	RK	Prepare expert rebuttal report for valuation analysis.	3.0
11/10/2025	CA	Finalization and review of the Brown valuation expert report	2.6
11/10/2025	CA	Review updates to the draft valuation expert report	0.5
11/10/2025	KBM	Review final valuation expert report	0.9
11/10/2025	MB	Draft valuation report	3.4
11/10/2025	MB	Review ModivCare financial data	0.6
11/10/2025	MB	Review valuation analysis	1.7
11/10/2025	MR	Finalize expert report re: ModivCare valuation.	2.3
11/10/2025	MR	Perform quality review of draft expert report.	2.6
11/10/2025	MR	Perform quality review of ModivCare valuation analysis for draft expert report.	3.0
11/10/2025	MR	Review supporting documents re: ModivCare valuation analysis.	0.8
11/10/2025	RK	Final review of valuation rebuttal analysis.	2.7

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	RK	Finalize valuation analysis for rebuttal report.	3.0
11/10/2025	RK	Review business plan rebuttal report for valuation impacts.	1.9
11/10/2025	RK	Review recovery analysis sensitivity analysis.	2.1
11/11/2025	MB	Review valuation data	0.6
11/11/2025	MR	Prepare supporting documents used to prepare ModivCare valuation analysis for production.	0.7
11/11/2025	RK	Accumulation and transfer of reliance materials for the valuation rebuttal report.	1.1
11/12/2025	MB	Prepare for deposition	1.1
11/12/2025	MB	Review reliance materials	0.4
11/12/2025	MR	Review reliance materials for M. Brown (AlixPartners) Expert Report re: valuation.	2.5
11/12/2025	MR	Perform analysis re: market pricing of ModivCare debt.	1.5
11/12/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	1.9
11/12/2025	RK	Review ModivCare LME and Exit financing.	1.9
11/13/2025	MB	Review Modivcare SEC filings	1.4
11/13/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	1.2
11/13/2025	TGP	Review expert rebuttal report of M. Brown	1.1
11/14/2025	CA	Perform research of competitors at the request of the expert	0.4
11/14/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.5
11/17/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	MB	Review expert reports	2.1
11/17/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	MR	Analyze Jamal expert report to prepare for expert depositions.	2.2
11/17/2025	MR	Perform valuation analysis to prepare for expert deposition.	1.1
11/17/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.6
11/17/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	RK	Prepare expert for rebuttal valuation report.	1.9
11/17/2025	RK	Review plan supplement for recovery analysis adjustments.	2.5
11/17/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/18/2025	AP	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	GM	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	JL	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	MB	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	MB	Review expert reports	2.4
11/18/2025	MB	Review valuation model	1.3

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	MR	Perform valuation analysis to prepare for expert deposition.	2.0
11/18/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.5
11/18/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	RK	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/19/2025	MB	Review expert reports	1.9
11/19/2025	MB	Review Modivcare bankruptcy filings	2.6
11/19/2025	MB	Review Moelis financial materials	0.8
11/19/2025	MR	Perform valuation analysis to prepare for expert deposition.	2.1
11/19/2025	RK	Prepare valuation rebuttal deposition.	3.0
11/20/2025	MB	Meeting with J. Zakia and E. Smith (W&C) re: deposition	1.9
11/20/2025	MB	Review expert reports	3.4
11/20/2025	MB	Review financial models	2.4
11/20/2025	MB	Review Modivcare SEC filings	1.4
11/20/2025	MB	Review Modivcare bankruptcy filings	1.8
11/20/2025	MR	Perform valuation analysis to prepare for expert deposition.	1.7
11/20/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.8
11/20/2025	MR	Review precedent transaction data to prepare for expert deposition.	0.9
11/20/2025	MR	Review public filings for selected publicly traded companies to prepare for expert deposition.	1.4
11/20/2025	RK	Prepare valuation rebuttal deposition.	2.0
11/21/2025	MB	Review expert report	0.9
11/21/2025	MR	Review valuation materials to prepare for expert deposition.	0.3
11/22/2025	CH	Analyze waterfall scenarios and illustrative recoveries	1.9
11/22/2025	CH	Draft email to R. Komendowski re: waterfall analysis	0.3
11/24/2025	MB	Prepare for confirmation hearing	0.7
11/24/2025	MR	Perform analysis of ModivCare valuation to prepare for confirmation hearing.	0.8
11/24/2025	RK	Prepare analysis for confirmation objection.	1.2
11/24/2025	RK	Review valuation report for confirmation objection.	1.0
11/25/2025	MB	Review confirmation brief	1.1
11/25/2025	MR	Perform research re: publicly traded company method to prepare for ModivCare confirmation hearing.	1.8
11/25/2025	RK	Review confirmation objection figures.	2.3
Total Professional Hours			**222.6**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.3	$	3,358.00
Kathryn B McGlynn	$1,415	2.6		3,679.00
Marc Brown	$1,415	53.8		76,127.00
Greg Magrisi	$1,250	0.5		625.00
Christopher Rubel	$1,225	8.4		10,290.00
Johnny Lee	$1,225	0.5		612.50
Ashutosh Panda	$1,150	0.5		575.00
Joel Amico	$1,150	4.9		5,635.00
Ryan Komendowski	$1,080	60.5		65,340.00
Matthew Root	$1,000	63.2		63,200.00
Matthew Wicker	$1,000	1.5		1,500.00
John Tutty	$950	6.0		5,700.00
Thomas G Prince	$950	1.1		1,045.00
Chase Hood	$850	2.2		1,870.00
Claire Allshouse	$810	14.6		11,826.00
Total Professional Hours and Fees		**222.6**	**$**	**251,382.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	CH	Review draft motion for standing	0.8
11/05/2025	CH	Review exit financing motion	0.4
11/06/2025	DM	Review presentation by ModivCare Debtors on ERO	0.4
11/07/2025	CH	Review exit facility outreach and competing proposals received	1.4
11/07/2025	KBM	Review exit facility proposals	0.9
11/08/2025	DM	Review presentation from ModivCare Debtors re: exit financing process and term sheets	0.6
11/10/2025	DM	Emails with attachments with J. Amico (AlixPartners) re: diligence of ModivCare exit financing process	0.3
11/12/2025	DM	Emails with J. Amico re: ModivCare exit financing process	0.2
11/17/2025	CH	Review plan supplements filed and related exhibits	1.8
11/17/2025	DM	Review ModivCare Plan supplement	1.5
11/18/2025	DM	Research re: exit financing work fees and expense reimbursement in comparable cases	0.7
11/18/2025	KBM	Review Plan Supplement	0.8
11/19/2025	DM	Assessment of email from A. Zatz (W&C) re: outline for confirmation objection	0.3
11/19/2025	DM	Emails with A. Zatz and B. Lingle (W&C) re: proposed ModivCare exit financing work fee and expense reimbursement	0.2
11/19/2025	KBM	Review confirmation objection related items	0.6
11/20/2025	TGP	Analyze the Debtors' Exit financing credit agreement	0.7
11/20/2025	TGP	Analyze the Debtors' New Warrants Agreement	0.9
11/20/2025	TGP	Analyze the Debtors' Plan Supplement	1.2
11/21/2025	CH	Analyze equity rights offering assumptions and value	1.3
11/21/2025	CH	Review equity rights offering procedures	0.6
11/21/2025	CH	Review initial draft of confirmation objection	0.7
11/23/2025	CH	Analyze GUC cashout recovery estimate	0.5
11/24/2025	DM	Provide comments on draft ModivCare confirmation objection	1.7
11/24/2025	KBM	Review changes to draft Confirmation objection	0.9
11/24/2025	KBM	Review second Plan supplement	0.4
11/25/2025	CH	Analyze latest settlement proposal from ad hoc group and estimated recovery value	0.6
11/25/2025	CH	Review and provide additional comments to further revised confirmation objection	1.4
11/25/2025	CH	Review second plan supplement re: retained causes of action	0.4
11/25/2025	CH	Revise and provide comments to revised confirmation objection	1.3
Total Professional Hours			**23.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.9	$	8,614.00
Kathryn B McGlynn	$1,415	3.6		5,094.00
Thomas G Prince	$950	2.8		2,660.00
Chase Hood	$850	11.2		9,520.00
Total Professional Hours and Fees		**23.5**	**$**	**25,888.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	DM	Review first supplemental declaration iso ModivCare retention	0.5
11/03/2025	KSM	Review updated proposed retention order	0.3
11/03/2025	LCB	Emails with G. Zahiremanmi (W&C), K. Sundt and J. Braverman (AlixPartners) re: filing of AlixPartners 1st Supplemental Declaration	0.3
11/04/2025	LCB	Review court docket for AlixPartners order	0.2
Total Professional Hours			**1.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Kaitlyn Sundt McClarren	$715	0.3		214.50
Laurie Capen Verry	$600	0.5		300.00
Total Professional Hours and Fees		**1.3**	**$**	**1,244.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	1.3
11/03/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	0.6
11/04/2025	KSM	Review first monthly fee application	0.4
11/04/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	0.8
11/04/2025	MDG	Review professional fees for September fee statement	0.7
11/04/2025	MDG	Review September 2025 monthly fee statement	0.6
11/05/2025	DM	Review ModivCare September monthly fee statement	0.5
11/05/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	0.4
11/05/2025	LMB	Correspondence to (W&C) attaching the First Monthly Fee Statement (September 2025) for filing on the Court docket	0.2
11/07/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.4
11/10/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	0.7
11/11/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.0
11/12/2025	LMB	Analyze professional fees for October 2025 Monthly Fee Statement for privilege and confidentiality	2.2
11/12/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	3.2
11/14/2025	LMB	Continue to prepare professional fees for October 2025 Monthly Fee Statement	3.2
11/14/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	3.4
11/20/2025	DM	Emails with E. Kardos (AlixPartners) re: ModivCare Lenders reservation of rights wrt/ UCC fees	0.2
11/20/2025	DM	Review ModivCare Lenders reservation of rights wrt/ UCC fees	0.2
Total Professional Hours			**23.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Matthew D Gates	$1,120	1.3		1,456.00
Kaitlyn Sundt McClarren	$715	0.4		286.00
Lisa Marie Bonito	$580	20.4		11,832.00
Total Professional Hours and Fees		**23.0**	**$**	**14,888.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	TGP	Analyze potential recoveries for creditors	2.2
11/04/2025	TGP	Analyze potential recoveries for creditors	2.4
11/05/2025	DM	Review draft ModivCare waterfall recovery slides	0.3
11/05/2025	RK	Sensitize waterfall analysis for updated valuation analysis.	1.9
Total Professional Hours			**6.8**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Ryan Komendowski	$1,080	1.9		2,052.00
Thomas G Prince	$950	4.6		4,370.00
Total Professional Hours and Fees		**6.8**	**$**	**6,860.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/19/2025	RK	Travel Geneva IL to New York, NY (attend deposition)	4.0
11/21/2025	MB	Travel from New York, NY to Chicago, IL (return from deposition)	2.3
11/24/2025	GM	Travel from home to Latham Boston (to attend deposition)	0.7
Total Professional Hours			**7.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
Marc Brown	$1,415	2.3		3,254.50
Greg Magrisi	$1,250	0.7		875.00
Ryan Komendowski	$1,080	4.0		4,320.00
Total Professional Hours and Fees		**7.0**	**$**	**8,449.50**
Less 50% Travel Fees				(8,890.00)
Total Professional Fees			**$**	**(440.50)**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
11/19/2025	Airfare Marc Brown 2025-11-19 ORD- LGA	128.48
11/19/2025	Airfare Ryan Komendowski 2025-11-19 ORD- LGA	280.98
11/19/2025	Lodging Ryan Komendowski Ritz Carlton Central Park, New York, NY 2025-11-19 2025-11-21 (two night stay)	1,500.00
11/19/2025	Lodging Marc Brown - Ritz Carlton Central Park, New York, NY 2025-11-19 2025-11-21 (two night stay)	1,500.00
11/19/2025	Individual Meal - Marc Brown - Breakfast	5.16
11/19/2025	Individual Meal - Marc Brown - Lunch	6.17
11/19/2025	Individual Meal - Ryan Komendowski - Breakfast	13.31
11/19/2025	Individual Meal - Ryan Komendowski - Lunch	60.00
11/19/2025	Group Meal - Marc Brown - Dinner - Ryan Komendowski; Marc Brown	160.00
11/20/2025	Taxi/Car Service Ryan Komendowski Hotel to LGA	124.52
11/20/2025	Taxi/Car Service Marc Brown LGA to Hotel	132.60
11/20/2025	Individual Meal - Marc Brown - Breakfast	21.32
11/20/2025	Individual Meal - Marc Brown - Lunch	31.68
11/21/2025	Airfare Ryan Komendowski 2025-11-21 LGA- ORD	171.64
11/21/2025	Airfare Marc Brown 2025-11-21 LGA- ORD	197.44
11/21/2025	Parking/Tolls Ryan Komendowski	134.45
11/21/2025	Taxi/Car Service Marc Brown Hotel to LGA	126.18
11/21/2025	Taxi/Car Service Ryan Komendowski LGA to Hotel	128.97
11/21/2025	Parking/Tolls Marc Brown	129.00
11/21/2025	Individual Meal - Ryan Komendowski - Breakfast	25.22
11/21/2025	Individual Meal - Ryan Komendowski - Lunch	28.02
11/21/2025	Individual Meal - Ryan Komendowski - Dinner	52.21
11/21/2025	Individual Meal - Marc Brown - Lunch	60.00
11/21/2025	Individual Meal - Marc Brown - Breakfast	40.00
11/24/2025	Taxi/Car Service Greg Magrisi Home to Latham office	24.12

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
11/24/2025	Taxi/Car Service Greg Magrisi Latham office to Home	28.73
11/24/2025	Individual Meal - Greg Magrisi - Breakfast	10.91
Total Expenses		**5,121.11**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Expenses		**Amount**
Airfare	$	778.54
Ground Transportation		828.57
Lodging		3,000.00
Meals		514.00
Total Expenses	**USD**	**5,121.11**

Exhibit D

Fourth Monthly Fee Statement
December 1, 2025 through December 29, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: January 29, 2026 @ 4:00 p.m. (CT)

FOURTH MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	12/1/2025	12/29/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$481,950.60 (80% of $602,438.25)	
Total expenses requested in this Fee Statement:	$16,839.23	
Total fees and expenses requested in this Fee Statement:	$498,789.83	
Blended hourly rate for professionals:	$1,087.04	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	49.9	$ 72,854.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	16.1	22,781.50
Marc Brown	Partner & Managing Director	$1,415	55.7	78,815.50
Greg Magrisi	Partner & Managing Director	$1,250	49.6	62,000.00
Christopher Rubel	Partner	$1,225	53.2	65,170.00
Johnny Lee	Partner	$1,225	3.7	4,532.50
Ashutosh Panda	Director	$1,150	31.4	36,110.00
Joel Amico	Director	$1,150	80.9	93,035.00
Ryan Komendowski	Director	$1,080	66.5	71,820.00
Matthew Root	Director	$1,000	49.7	49,700.00
Kaitlyn Sundt McClarren	Director	$715	0.6	429.00
John Tutty	Senior Vice President	$950	3.7	3,515.00
Thomas G Prince	Senior Vice President	$950	1.9	1,805.00
Christopher Cuomo	Senior Vice President	$910	0.4	364.00
Chase Hood	Senior Vice President	$850	68.1	57,885.00
Lucas Lovatto	Vice President	$835	1.0	835.00
Lisa Marie Bonito	Vice President	$580	21.8	12,644.00
Total Hours and Fees for Professionals			**554.2**	**$ 634,295.50**
Less: 50% Travel Fees				(31,857.25)
Total Fees for Professionals				**$ 602,438.25**
Less: 20% Holdback				(120,487.65)
Total Fees for Professionals Less Holdback				**$ 481,950.60**

Average Billing Rate	**$ 1,087.04**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	3.2	$ 3,706.00
1.2	Meetings & Communication with UCC and Creditors	18.0	20,772.00
1.3	Prepare Committee Presentations	10.6	11,905.50
1.7	Liquidity and Cash Management	6.2	5,660.00
1.9	Business and Strategic Plan	39.5	47,320.00
1.11	Financial and Other Diligence	40.5	42,895.00
1.12	Other Motions and Related Objections	4.1	4,850.00
1.13	Litigation Support & Investigations	48.7	59,804.00
1.14	Claims Analysis	13.2	12,180.00
1.15	Valuation and Solvency Analysis	104.6	121,856.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	27.5	27,076.00
1.18	Court Hearings and Status Conferences	153.1	184,505.50
1.20	Fee Applications & Fee Statements	35.5	28,051.00
1.31	Travel Time	49.5	31,857.25
	Total Hours and Fees By Matter Category Before Holdback	**554.2**	**$ 602,438.25**

Average Billing Rate $ 1,087.04

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Expense Category	Amount
Airfare	$ 4,136.61
Ground Transportation	2,674.13
Lodging	8,797.53
Meals	1,230.96
Total Expenses	**$ 16,839.23**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this third monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from December 1, 2025 through December 29, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $602,438.25 and reimbursement of out-of-pocket expenses in the amount of $16,839.23 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $481,950.60 (80% of $602,438.25) and 100% of out-of-pocket expenses in the amount of $16,839.23 for a total amount of $498,789.83; and (iii) such other and further relief as this Court deems proper.

Dated: January 15, 2026

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
Total Professional Hours			**3.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.4	$	584.00
Kathryn B McGlynn	$1,415	0.4		566.00
Greg Magrisi	$1,250	0.4		500.00
Ashutosh Panda	$1,150	0.4		460.00
Joel Amico	$1,150	0.4		460.00
Ryan Komendowski	$1,080	0.4		432.00
Christopher Cuomo	$910	0.4		364.00
Chase Hood	$850	0.4		340.00
Total Professional Hours and Fees		**3.2**	**$**	**3,706.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CR	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	DM	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	DM	Communication with J. Zakia (W&C) re: ModivCare confirmation hearing	0.3
12/01/2025	JA	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	RK	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/03/2025	CH	Email correspondence with V. Sachdev (W&C) re: contract rejection analysis	0.4
12/03/2025	CH	Email correspondence with V. Sachdev (W&C) re: revised legal entity analysis	0.7
12/03/2025	CH	Review update from counsel re: status conference	0.2
12/04/2025	AP	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	CH	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	CR	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	CR	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	GM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/04/2025	GM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	RK	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	RK	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/05/2025	KBM	Review case updates and next steps re: Confirmation hearing from Committee Counsel	0.7
12/07/2025	CH	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	CH	Draft email to W&C re: plan voting and critical vendor payment analysis	0.8
12/07/2025	DM	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	JA	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	RK	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/08/2025	CH	Draft email to A. Zatz and V. Sachdev (W&C) re: claim voting analysis	0.8
12/09/2025	CH	Review update from counsel re: exit financing	0.2
12/18/2025	CH	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	DM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2025	GM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	JA	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
Total Professional Hours			**18.0**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.0	$	4,380.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Greg Magrisi	$1,250	1.2		1,500.00
Christopher Rubel	$1,225	1.5		1,837.50
Ashutosh Panda	$1,150	0.7		805.00
Joel Amico	$1,150	2.7		3,105.00
Ryan Komendowski	$1,080	2.2		2,376.00
Chase Hood	$850	4.8		4,080.00
Total Professional Hours and Fees		**18.0**	**$**	**20,772.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.3
12/03/2025	JA	Draft UCC weekly update materials	1.6
12/04/2025	KBM	Review weekly update presentation	0.7
12/10/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.3
12/15/2025	JA	Prepare summary slides on Plan for Committee	1.5
12/16/2025	DM	Review draft presentation to ModivCare UCC re: Plan recoveries	0.5
12/16/2025	JA	Draft of materials for Committee re recoveries under Plan	1.3
12/17/2025	DM	Review revised draft slides for ModivCare UCC re: Plan vs offered recoveries	0.5
12/17/2025	JA	Draft of materials for Committee re recoveries under Plan	1.2
12/18/2025	JA	Prepare for upcoming Committee meeting on Plan recoveries and next steps	0.7
Total Professional Hours			**10.6**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.0	$	1,460.00
Kathryn B McGlynn	$1,415	0.7		990.50
Joel Amico	$1,150	6.3		7,245.00
Chase Hood	$850	2.6		2,210.00
Total Professional Hours and Fees		**10.6**	**$**	**11,905.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Review intercompany matrix and transaction detail uploaded to dataroom	1.4
12/01/2025	CH	Review non-Debtor intercompany transaction detail uploaded to dataroom	0.9
12/01/2025	CH	Review variance and liquidity reporting package for week ended 11/23	0.8
12/01/2025	JA	Analyze UCC professional fee forecasts per Debtor requests	0.5
12/03/2025	JA	Review company cash reporting and evaluate go forward liquidity	0.8
12/07/2025	CH	Review first day motion reporting re: critical vendor payments and intercompany transactions	0.4
12/10/2025	CH	Review variance and liquidity reporting package for week ended 11/23	0.9
12/15/2025	CH	Review variance and liquidity reporting package for week ended 12/7	0.5
Total Professional Hours			**6.2**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
Joel Amico	$1,150	1.3	$	1,495.00
Chase Hood	$850	4.9		4,165.00
Total Professional Hours and Fees		**6.2**	**$**	**5,660.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	AP	Review of business plan rebuttal report in preparation for review with counsel	0.5
12/04/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	1.0
12/05/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	1.5
12/07/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	3.0
12/08/2025	AP	Prepare for expert testimony of Greg Magrisi re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/08/2025	CH	Draft analysis re: business plan forecast compared to actual performance	1.8
12/08/2025	GM	Business Plan Rebuttal Report Testimony preparation with counsel (all day preparation session)	11.0
12/08/2025	LL	Review top 20 customers contracts and synthesized terms and clauses re: risk sharing	1.0
12/09/2025	AP	Prepare for expert testimony of Greg Magrisi on cost and capex opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/09/2025	AP	Prepare for expert testimony of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/09/2025	GM	Business Plan Rebuttal Report Testimony preparation with counsel (all day preparation session)	11.0
Total Professional Hours			**39.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
Greg Magrisi	$1,250	27.5	$	34,375.00
Ashutosh Panda	$1,150	9.2		10,580.00
Chase Hood	$850	1.8		1,530.00
Lucas Lovatto	$835	1.0		835.00
Total Professional Hours and Fees		**39.5**	**$**	**47,320.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Review monthly operating reports and financial data for October	1.8
12/01/2025	JA	Review Debtor and UCC deposition transcripts re draft of follow up items	1.2
12/01/2025	JA	Review Debtors reporting re balance sheet and monthly operating reports re post petition payables	1.3
12/01/2025	JA	Review filing and historical documents re uptier transaction	1.2
12/01/2025	RK	Review uptier analysis considerations	1.3
12/02/2025	CH	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	CH	Review October trial balance and management financial reporting	1.3
12/02/2025	JA	Identification and draft of key open diligence requests	0.6
12/02/2025	JA	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	JA	Review and provide comments on various emails and other correspondence from W&C re info for confirmation hearing	1.1
12/02/2025	JA	Review data room re recent financial performance package	0.4
12/02/2025	JA	Review of monthly operating reports to derive recent operating performance	0.5
12/02/2025	JT	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	JT	Revised analysis of balance sheet and profitability by legal entity	1.8
12/03/2025	JA	Analyze filed monthly operating report reporting re recent performance and payments of prepetition claims	1.1
12/03/2025	JA	Analyze various outcomes of Plan confirmation and impact on recoveries	1.0
12/03/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/04/2025	JA	Analyze voting results and prepare summary based on vendors paid	1.3
12/04/2025	JA	Prepare for upcoming UCC Committee meeting	0.5
12/04/2025	JA	Review data room re historical recent financial performance and vendors classified as critical to pay prepetition claims	1.0
12/04/2025	RK	Review expert materials for upcoming trial.	2.7
12/05/2025	JA	Review debtors supplemental declaration: Jamal	0.7
12/05/2025	JA	Review debtors supplemental declaration: Shandler	0.8
12/05/2025	RK	Review expert materials for upcoming trial.	3.0
12/07/2025	CH	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/07/2025	JA	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/07/2025	JT	Analyze general unsecured claims cash out elections	1.1
12/07/2025	JT	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/08/2025	JA	Review and response to various requests from W&C re diligence for Confirmation hearing	1.0
12/09/2025	JA	Review and response to W&C diligence requests re Confirmation hearing	1.0
12/09/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/10/2025	CH	Review data room for detailed Debtor and non-Debtor org chart	0.4
12/10/2025	RK	Prepare demonstratives for conformation hearing.	2.6
12/11/2025	RK	Prepare documents for confirmation hearing.	2.4

AlixPartners

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Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/23/2025	JA	Analyze revised warrant agreement	1.0
12/23/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/29/2025	JA	Analyze warrant agreement	1.0
12/29/2025	RK	Review updated warrant computation.	1.8
Total Professional Hours			**40.5**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS	FEES
Joel Amico	$1,150	17.5	20,125.00
Ryan Komendowski	$1,080	13.8	14,904.00
John Tutty	$950	3.7	3,515.00
Chase Hood	$850	4.3	3,655.00
Lisa Marie Bonito	$580	1.2	696.00
Total Professional Hours and Fees		**40.5**	**$ 42,895.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	JA	Review and provide comments on various motions re Confirmation hearing	0.8
12/04/2025	JA	Review and provide comments on various W&C drafts and analysis for confirmation hearing	1.5
12/05/2025	JL	Review and provide comments/speaking points related to Debtors plan support filings and rebuttal of expert report	1.8
Total Professional Hours			**4.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
Johnny Lee	$1,225	1.8	$	2,205.00
Joel Amico	$1,150	2.3		2,645.00
Total Professional Hours and Fees		**4.1**	**$**	**4,850.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CR	Draft direct testimony scripts and exhibits in preparation for trial.	3.2
12/02/2025	CR	Draft direct testimony scripts and related demonstratives in preparation for trial.	2.3
12/02/2025	CR	Valuation research in preparation for trial.	1.8
12/03/2025	CR	Developed Jamal cross exam points in preparation for trial.	1.5
12/03/2025	CR	Draft direct testimony script and related demonstratives in preparation for trial.	2.5
12/03/2025	CR	Review Jamal and Brown deposition transcripts in preparation for trial.	1.8
12/03/2025	CR	Review valuation expert reports in preparation for trial.	2.3
12/04/2025	CR	Draft direct testimony script and related demonstratives in preparation for trial.	2.8
12/04/2025	CR	Review and compiled cross examination points in preparation for trial.	1.3
12/04/2025	CR	Review deposition transcripts in preparation for trial.	1.5
12/04/2025	CR	Review valuation expert reports in preparation for trial.	1.8
12/05/2025	CR	Draft cross examination points in preparation for trial.	1.8
12/05/2025	CR	Draft direct testimony scripts and related demonstratives in preparation for trial.	2.3
12/05/2025	CR	Review deposition transcripts in preparation for trial.	1.3
12/05/2025	CR	Review valuation expert reports in preparation for trial.	1.3
12/05/2025	RK	Review documents produced for trial preparation.	2.3
12/08/2025	CR	Draft and reviewed direct testimony outlines and exhibits.	2.5
12/08/2025	CR	Review cross examination materials in preparation for expert testimony.	2.5
12/08/2025	DM	Working session with J. Amico and D. MacGreevey (AlixPartners) re: ModivCare confirmation recap and witness preparation	1.5
12/08/2025	JA	Working session with J. Amico and D. MacGreevey (AlixPartners) re: ModivCare confirmation recap and witness preparation	1.5
12/09/2025	CR	Assist with Brown expert testimony preparation.	1.8
12/09/2025	CR	Draft and review direct testimony materials.	2.3
12/09/2025	CR	Review cross examination materials in preparation for expert testimony.	1.8
12/09/2025	DM	Working session with J. Amico and D. MacGreevey (AlixPartners) re: confirmation preparation, Magrisi and Brown testimony and demonstratives	1.5
12/09/2025	JA	Working session with J. Amico and D. MacGreevey (AlixPartners) re: confirmation preparation, Magrisi and Brown testimony and demonstratives	1.5
Total Professional Hours			**48.7**

AlixPartners

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Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.0	$	4,380.00
Christopher Rubel	$1,225	40.4		49,490.00
Joel Amico	$1,150	3.0		3,450.00
Ryan Komendowski	$1,080	2.3		2,484.00
Total Professional Hours and Fees		**48.7**	**$**	**59,804.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Analyze mapping of legal entities and business units for claims	0.7
12/01/2025	CH	Draft analysis re: claims and material assets by legal entity	2.5
12/02/2025	CH	Analyze claim register and proofs of claim to map claims to legal entities	1.6
12/02/2025	CH	Draft analysis re: contract rejection claims and estimated claims exposure	0.7
12/02/2025	CH	Draft analysis re: estimated claims by legal entity	1.3
12/02/2025	CH	Draft analysis re: real estate lease rejection claims and estimated claims exposure	1.7
12/02/2025	CH	Draft updates to legal entity analysis to incorporate comments from J. Amico (AlixPartners)	0.6
12/02/2025	CH	Draft updates to legal entity claim analysis to incorporate revised claim estimates	0.6
12/02/2025	CH	Internal call with J. Amico, C. Hood (AlixPartners) re: claims analysis by legal entity	0.3
12/02/2025	JA	Analyze general unsecured claims and reconcile to evaluate various scenarios for Confirmation hearing	1.4
12/02/2025	JA	Internal call with J. Amico, C. Hood (AlixPartners) re: claims analysis by legal entity	0.3
12/03/2025	JA	Analyze various rejected claims and claims objections to determine impact on general unsecured claims class	1.5
Total Professional Hours			**13.2**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Joel Amico	$1,150	3.2	$	3,680.00
Chase Hood	$850	10.0		8,500.00
Total Professional Hours and Fees		**13.2**	**$**	**12,180.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	MB	Prepare for confirmation hearing	0.7
12/02/2025	MB	Prepare for confirmation hearing	0.6
12/02/2025	RK	Prepare expert materials for trial.	1.6
12/03/2025	MB	Review deposition transcripts	2.1
12/03/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	1.3
12/03/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.2
12/03/2025	RK	Prepare demonstratives for trial.	1.9
12/04/2025	MB	Prepare direct testimony	2.6
12/04/2025	MB	Review deposition transcripts	0.9
12/04/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	2.8
12/04/2025	MR	Perform valuation research re: selected publicly traded companies.	2.6
12/04/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.9
12/05/2025	MB	Analyze Jamal declaration	2.6
12/05/2025	MB	Review deposition transcript	0.8
12/05/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.5
12/05/2025	MR	Perform valuation research re: private company valuation discounts for ModivCare valuation.	2.5
12/05/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.0
12/06/2025	MB	Prepare for valuation rebuttal analysis testimony	1.7
12/06/2025	MB	Review deposition transcript	1.2
12/06/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	3.0
12/06/2025	MR	Prepare valuation materials to prepare for ModivCare confirmation hearing.	2.4
12/07/2025	MB	Review deposition transcript	1.4
12/07/2025	MB	Review valuation data	0.8
12/07/2025	MR	Prepare valuation materials to prepare for ModivCare confirmation hearing.	1.7
12/08/2025	MB	Prepare for direct testimony	2.3
12/08/2025	MB	Review expert reports	3.3
12/08/2025	MB	Review Medicare bankruptcy pleadings	1.4
12/08/2025	MB	Review rebuttal analysis	2.6
12/08/2025	MB	Review valuation support data	2.4
12/08/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.8
12/08/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	3.0
12/08/2025	MR	Perform valuation research re: selected publicly traded companies for hearing preparation.	2.3
12/08/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	0.9
12/08/2025	RK	Prepare with expert for confirmation trial testimony.	2.5
12/08/2025	RK	Review documents and analysis for confirmation trial.	3.0
12/09/2025	MB	Conduct rebuttal analysis	1.2
12/09/2025	MB	Prepare for confirmation hearing	1.0
12/09/2025	MB	Prepare trial demonstratives	1.3
12/09/2025	MB	Review deposition	1.1
12/09/2025	MB	Review expert reports	2.6
12/09/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.5
12/09/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	1.8
12/09/2025	MR	Perform valuation research re: precedent transactions for hearing preparation.	1.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/09/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.2
12/09/2025	RK	Finalization of trial demonstratives for valuation expert.	2.5
12/09/2025	RK	Prepare with expert for confirmation trial testimony.	2.6
12/10/2025	MB	Prepare for confirmation hearing	3.2
12/10/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	2.6
12/10/2025	MR	Prepare draft demonstratives for confirmation hearing closing.	1.6
12/10/2025	MR	Review Jamal Declaration to prepare for ModivCare confirmation hearing.	1.5
12/10/2025	RK	Assist counsel with preparation of closing demonstratives.	2.4
12/11/2025	MB	Conduct analysis for confirmation hearing	0.6
12/11/2025	MR	Prepare draft demonstratives for confirmation hearing closing.	1.0
Total Professional Hours			**104.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
Marc Brown	$1,415	38.4	$	54,336.00
Ryan Komendowski	$1,080	16.5		17,820.00
Matthew Root	$1,000	49.7		49,700.00
Total Professional Hours and Fees		**104.6**	**$**	**121,856.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/04/2025	CH	Review and provide comments to plan event scenario analysis	0.5
12/04/2025	CH	Review Debtors' certification of solicitation of votes and tabulation of ballots and related results	0.8
12/04/2025	CH	Review statement of consenting creditors in support of plan confirmation	0.7
12/05/2025	CH	Review C. Shandler declaration in support of plan confirmation	1.1
12/05/2025	CH	Review correspondence from counsel re: plan voting results	0.4
12/05/2025	CH	Review Debtors' brief in support of plan and objection to Committee standing motions	1.9
12/05/2025	CH	Review draft stipulation re: certification of voting results	0.3
12/05/2025	CH	Review Z. Jamal declaration in support of plan confirmation	1.3
12/05/2025	JA	Analyze Plan voting results and prepare summary schedules	0.8
12/05/2025	JA	Review lenders responses re UCC confirmation objection	1.3
12/05/2025	JA	Review various Debtor filings in support of Confirmation	1.5
12/05/2025	KBM	Review information re: voting results	0.7
12/05/2025	TGP	Analyze the Debtors' voting declaration and report	1.2
12/05/2025	TGP	Review analysis of voting results	0.7
12/07/2025	CH	Draft analysis re: plan voting and critical vendor payments	1.7
12/07/2025	CH	Review draft UCC standing motion reply	0.4
12/07/2025	CH	Review revised stipulation re: certification of voting results	0.3
12/08/2025	CH	Draft analysis re: voting results by class to adjust for satisfied and objected to claims	2.1
12/08/2025	CH	Review J. Lee direct demonstrative re: claim voting tabulation in advance of confirmation hearing	0.4
12/08/2025	KBM	Review Debtors' brief re: omnibus to Plan confirmation	0.9
12/08/2025	KBM	Review updates from Committee Counsel re: voting results	0.8
12/09/2025	RK	Review documents and analysis for confirmation trial.	2.6
12/10/2025	CH	Draft comparative analysis of exit facility proposal term sheets	1.4
12/10/2025	CH	Review latest exit facility term sheet received	0.5
12/11/2025	CH	Review supplemental voting tabulation and impact on plan approval	0.6
12/12/2025	DM	Review Debtors' documents in support of Plan	0.5
12/16/2025	CH	Review updated waterfall recovery analysis per the confirmed plan	0.6
12/18/2025	KBM	Review comparison of proposals compared to Plan	0.4
12/23/2025	CH	Review plan supplement re: warrants mechanics	0.6
12/23/2025	CH	Review update from counsel re: exit financing	0.3
12/29/2025	LMB	Review Effective Date Notice	0.2
Total Professional Hours			**27.5**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Kathryn B McGlynn	$1,415	2.8		3,962.00
Joel Amico	$1,150	3.6		4,140.00
Ryan Komendowski	$1,080	2.6		2,808.00
Thomas G Prince	$950	1.9		1,805.00
Chase Hood	$850	15.9		13,515.00
Lisa Marie Bonito	$580	0.2		116.00
Total Professional Hours and Fees		**27.5**	**$**	**27,076.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/03/2025	DM	Attend ModivCare status conference	0.5
12/03/2025	KBM	Attend ModivCare status conference	0.5
12/08/2025	AP	Attend testimony of Ken Shepard NEMT CFO of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/08/2025	AP	Attend testimony of Leslie Norwalk Board Chair of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/08/2025	CH	Attend confirmation hearing (remotely)	5.1
12/08/2025	CR	Attend trial proceedings in preparation for Brown and Magrisi testimony (remotely)	1.8
12/08/2025	DM	Attend ModivCare confirmation hearing and UCC breakout sessions	8.8
12/08/2025	JA	Attend Confirmation hearing (in person)	7.0
12/08/2025	JL	Prepare materials for Magrisi hearing testimony and support	1.3
12/08/2025	KBM	Attend confirmation hearing (partial)	2.7
12/08/2025	RK	Attend confirmation hearing	6.8
12/09/2025	AP	Attend testimony of Chad Shandler (FTI) CTO of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/09/2025	AP	Attend testimony of Zul Jamal (Moelis) Debtors' Valuation expert witness re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/09/2025	CH	Attend confirmation hearing (remotely)	5.2
12/09/2025	CR	Attend confirmation hearing (remotely) in preparation for Brown and Magrisi testimony.	2.5
12/09/2025	DM	Attend ModivCare confirmation hearing and UCC breakout sessions	8.5
12/09/2025	JA	Attend confirmation hearing (in person)	7.0
12/09/2025	KBM	Attend confirmation hearing (partial)	4.4
12/09/2025	MB	Attend afternoon session of confirmation hearing	3.0
12/09/2025	MB	Attend morning session of confirmation hearing	3.5
12/09/2025	RK	Attend confirmation hearing	6.3
12/10/2025	AP	Attend testimony of Greg Magrisi (AlixPartners) re: Mr. Magrisi's rebuttal report on Debtors' business plan and projections	2.9
12/10/2025	AP	Attend testimony of Marc Brown (AlixPartners) re: Mr. Brown's rebuttal report of Debtors' business plan and projections and Mr. Jamal's valuation	2.9
12/10/2025	CH	Telephonic attendance of confirmation hearing	4.5
12/10/2025	CR	Attend trial remotely.	7.0
12/10/2025	DM	(Partial) Attend ModivCare confirmation hearing and UCC breakout sessions	4.5
12/10/2025	GM	Provide business plan testimony at confirmation hearing	3.5
12/10/2025	GM	Business Plan Rebuttal Report Testimony preparation and review of relevant documents	2.5
12/10/2025	JA	Attend confirmation hearing (in person)	6.0
12/10/2025	MB	Attend morning session of confirmation hearing	3.3
12/10/2025	MB	Provide testimony at confirmation hearing	1.8
12/10/2025	RK	Attend bankruptcy court Confirmation hearing.	4.8
12/11/2025	AP	Attend confirmation hearing (remotely)	2.9
12/11/2025	CH	Attend confirmation hearing (remotely)	3.6
12/11/2025	DM	Attend confirmation hearing (remotely)	3.7
12/11/2025	JA	Attend Confirmation hearing closing arguments	3.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/11/2025	KBM	Attend Confirmation hearing	2.4
12/11/2025	RK	Attend Confirmation hearing closing arguments	3.5
12/12/2025	AP	Attend confirmation ruling (remotely)	0.8
12/12/2025	CH	Attend confirmation ruling (remotely)	0.5
12/12/2025	DM	Attend confirmation ruling (remotely)	0.5
12/12/2025	JA	Attend confirmation ruling (remotely)	0.3
12/12/2025	JL	Attend confirmation ruling (remotely)	0.6
12/12/2025	KBM	Attend confirmation ruling (remotely)	0.3
Total Professional Hours			**153.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	26.5	$	38,690.00
Kathryn B McGlynn	$1,415	10.3		14,574.50
Marc Brown	$1,415	11.6		16,414.00
Greg Magrisi	$1,250	6.0		7,500.00
Christopher Rubel	$1,225	11.3		13,842.50
Johnny Lee	$1,225	1.9		2,327.50
Ashutosh Panda	$1,150	21.1		24,265.00
Joel Amico	$1,150	24.1		27,715.00
Ryan Komendowski	$1,080	21.4		23,112.00
Chase Hood	$850	18.9		16,065.00
Total Professional Hours and Fees		**153.1**	**$**	**184,505.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	LMB	Analyze expenses for October 2025 monthly fee statement	0.8
12/02/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.2
12/02/2025	LMB	Prepare schedule/exhibit workbook for October 2025 Monthly Fee Statement	1.0
12/02/2025	LMB	Prepare Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	1.2
12/03/2025	DM	Review and comments on ModivCare October fee statement	0.7
12/03/2025	KSM	Review Second Monthly Fee Statement (October 2025)	0.3
12/03/2025	LMB	Revise Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	1.3
12/03/2025	LMB	Emails to/from D. MacGreevey (AlixPartners) re: October 2025 Monthly fee statement	0.2
12/03/2025	LMB	Finalize Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	0.4
12/03/2025	LMB	Email to D. Litz (W&C) attaching the Second Monthly Fee Statement (October 2025) for filing on the Court docket	0.2
12/04/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	2.5
12/08/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	3.2
12/09/2025	CH	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	2.2
12/09/2025	CH	Continue to analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.2
12/09/2025	LMB	Prepare fee application summary chart	0.4
12/11/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.5
12/12/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.8
12/15/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality compliance with U.S. Trustee standards	1.5
12/15/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	1.8
12/15/2025	LMB	Analyze expenses for November 2025 Monthly Fee Statement	0.8
12/16/2025	CH	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	0.9
12/16/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality compliance with U.S. Trustee standards	1.7
12/17/2025	CH	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	DM	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	JA	Analyze November Monthly Fee Statement for privilege and confidentiality; compliance with U.S. Trustee standards	1.3
12/17/2025	JA	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	LMB	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/17/2025	LMB	Prepare Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	2.0
12/18/2025	DM	Provide comments on ModivCare November monthly fee statement	0.6
12/18/2025	JA	Revise November Monthly Fee Statement	0.5
12/18/2025	KSM	Review Third Monthly Fee Statement (November 2025),	0.3
12/18/2025	LMB	Revise Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	0.8
12/18/2025	LMB	Finalize Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	0.5
12/18/2025	LMB	Email to D. Litz (W&C) attaching the Third Monthly Fee Statement (November 2025) for filing on the Court docket	0.2
12/19/2025	LMB	Revise Third Monthly Fee Statement (November 2025), supporting schedules and exhibits pursuant to comments from Counsel	0.4
12/23/2025	LMB	Update fee application summary chart	0.3
Total Professional Hours			**35.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Joel Amico	$1,150	8.5		9,775.00
Kaitlyn Sundt McClarren	$715	0.6		429.00
Chase Hood	$850	4.5		3,825.00
Lisa Marie Bonito	$580	20.4		11,832.00
Total Professional Hours and Fees		**35.5**	**$**	**28,051.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/07/2025	DM	Travel from NY to Houston, TX (attend ModivCare confirmation hearing	8.0
12/07/2025	GM	Travel from Boston to Houston, TX (attend ModivCare confirmation hearing	7.5
12/07/2025	JA	Travel from Buffalo, NY to Houston, TX (attend confirmation hearing	4.0
12/07/2025	RK	Travel from Chicago, IL to Houston, TX (attend trial)	3.3
12/08/2025	MB	Travel from Chicago, IL to Houston, TX (attend confirmation hearing	0.9
12/10/2025	DM	Travel from Houston, TX to Armonk, NY (return from confirmation hearing)	6.0
12/10/2025	GM	Travel from Houston, TX to Boston, MA (attend confirmation hearing)	7.0
12/10/2025	JA	Travel from Houston, TX to Buffalo, NY (return from confirmation hearing)	4.0
12/10/2025	MB	Travel from Houston, TX to Chicago, IL (return from confirmation hearing)	4.8
12/10/2025	RK	Travel from Houston TX to Chicago, IL (return from Court hearing)	4.0
Total Professional Hours			**49.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	14.0	$	20,440.00
Marc Brown	$1,415	5.7		8,065.50
Greg Magrisi	$1,250	14.5		18,125.00
Joel Amico	$1,150	8.0		9,200.00
Ryan Komendowski	$1,080	7.3		7,884.00
Total Professional Hours and Fees		**49.5**	**$**	**63,714.50**
Less 50% Travel Fees				(31,857.25)
Total Professional Fees			**$**	**31,857.25**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/07/2025	Airfare Greg Magrisi 2025-12-07 ORF- CLT	519.74
12/07/2025	Airfare Ryan Komendowski 2025-12-07 ORD- IAH	623.67
12/07/2025	Airfare Ashutosh Panda 2025-12-07 EWR- IAH	418.10
12/07/2025	Airfare Joel Amico 2025-12-07 BUF- HOU	642.18
12/07/2025	Taxi/Car Service Greg Magrisi Airport to Hotel	127.27
12/07/2025	Mileage Joel Amico 48 Miles from home to airport	33.60
12/07/2025	Taxi/Car Service Ashutosh Panda IAH Airport to Hotel in Houston	114.15
12/07/2025	Taxi/Car Service Ashutosh Panda Home in NJ to Ewr airport	200.44
12/07/2025	Lodging Greg Magrisi Four Seasons Hotel, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Lodging David MacGreevey - JW Marriott, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Lodging Joel Amico JW Marriott, Houston, TX 2025-12-07 2025-12-10	1,297.53
12/07/2025	Lodging Ashutosh Panda - JW Marriott, Houston, TX 2025-12-07 2025-12-11	2,000.00
12/07/2025	Lodging Ryan Komendowski - Four Seasons Hotel, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Individual Meal - Greg Magrisi - Lunch	31.02
12/07/2025	Individual Meal - Greg Magrisi - Dinner	23.40
12/07/2025	Individual Meal - Joel Amico - Dinner	24.40
12/07/2025	Individual Meal - Ryan Komendowski - Breakfast	5.07
12/07/2025	Individual Meal - Ryan Komendowski - Lunch	14.33
12/08/2025	Airfare Marc Brown 2025-12-08 ORD- IAH	419.49
12/08/2025	Taxi/Car Service David MacGreevey IAH Airport to Hotel	159.51
12/08/2025	Taxi/Car Service Greg Magrisi W&C office to Hotel	11.94
12/08/2025	Taxi/Car Service Greg Magrisi Hotel to W&C office	7.95
12/08/2025	Taxi/Car Service Joel Amico Houston airport to Hotel	54.00

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/08/2025	Taxi/Car Service Ryan Komendowski IAH to Hotel	93.12
12/08/2025	Lodging Marc Brown Four Seasons Hotel, Houston, TX 2025-12-08 2025-12-10	1,000.00
12/08/2025	Group Meal - David MacGreevey - Dinner - Joel Amico; David MacGreevey	150.00
12/08/2025	Individual Meal - Greg Magrisi - Dinner	75.00
12/08/2025	Individual Meal - Greg Magrisi - Breakfast	13.10
12/08/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	11.37
12/08/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/08/2025	Individual Meal - Marc Brown - Breakfast	9.43
12/08/2025	Individual Meal - Marc Brown - Breakfast	20.09
12/08/2025	Group Meal - Marc Brown - Dinner - Ryan Komendowski; Marc Brown	150.00
12/08/2025	Individual Meal - Ryan Komendowski - Breakfast	12.08
12/09/2025	Taxi/Car Service Greg Magrisi Hotel to W&C office	12.94
12/09/2025	Taxi/Car Service Marc Brown IAH to Hotel	179.35
12/09/2025	Individual Meal - Greg Magrisi - Dinner	75.00
12/09/2025	Individual Meal - Greg Magrisi - Breakfast	6.44
12/09/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	24.79
12/09/2025	Group Meal - David MacGreevey - Dinner - Joel Amico; David MacGreevey	150.00
12/09/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/09/2025	Individual Meal - Marc Brown - Dinner	75.00
12/09/2025	Group Meal - Ashutosh Panda - Lunch - Greg Magrisi; Ashutosh Panda	33.17
12/10/2025	Airfare Joel Amico 2025-12-10 IAH- BUF	526.58
12/10/2025	Airfare Marc Brown 2025-12-10 IAH- ORD	704.63
12/10/2025	Taxi/Car Service Greg Magrisi Boston to Home	72.41

AlixPartners

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Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/10/2025	Taxi/Car Service Greg Magrisi Office to IAH	97.44
12/10/2025	Taxi/Car Service David MacGreevey Hotel to IAH Airport	145.97
12/10/2025	Taxi/Car Service Joel Amico Courthouse to Houston airport	68.42
12/10/2025	Taxi/Car Service Marc Brown Hotel to IAH	146.84
12/10/2025	Parking/Tolls Marc Brown	129.00
12/10/2025	Individual Meal - Greg Magrisi - Dinner	40.28
12/10/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	27.23
12/10/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/10/2025	Individual Meal - Joel Amico - Dinner	54.06
12/11/2025	Airfare Greg Magrisi 2025-12-11 IAH- BOS	282.22
12/11/2025	Taxi/Car Service David MacGreevey LGA Airport to Home	330.90
12/11/2025	Taxi/Car Service Joel Amico Buffalo Airport to Home	74.30
12/11/2025	Taxi/Car Service Ashutosh Panda Houston to IAH Airport	205.66
12/11/2025	Parking/Tolls Ryan Komendowski	165.00
12/11/2025	Taxi/Car Service Ryan Komendowski Hotel to IAH	58.79
12/11/2025	Individual Meal - Greg Magrisi - Dinner	14.23
12/11/2025	Group Meal - Ashutosh Panda - Lunch - Greg Magrisi; Ashutosh Panda	32.82
12/11/2025	Individual Meal - Ashutosh Panda - Dinner	34.47
12/11/2025	Individual Meal - Ryan Komendowski - Lunch	19.18
12/12/2025	Taxi/Car Service Ashutosh Panda EWR airport to Home NJ	185.13
Total Expenses		**16,839.23**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Expenses		**Amount**
Airfare	$	4,136.61
Ground Transportation		2,674.13
Lodging		8,797.53
Meals		1,230.96
Total Expenses	**USD**	**16,839.23**

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

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

ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES
(Docket No. ____)

The Court has considered the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through December 29, 2025* (the "Application"), filed by AlixPartners, LLP (the "Applicant"). The Court orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of $5,022,757.29 for the period set forth in the Application.

2. The Debtors are authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order.

Dated: _____, 2026
Houston, Texas

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

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

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

COMPLEX CASE FEE APPLICATION COVER SHEET FOR WHITE & CASE LLP'S FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in Case:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	October 31, 2025 [Docket No. 616]	
Application: **FINAL**	**Beginning Date**	**End Date**
Time period covered by this Application for which interim compensation has not previously been awarded:	12/1/2025	12/29/2025
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?		Yes
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?		Yes
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases?		Yes
Do expense reimbursements represent actual and necessary expenses incurred?		Yes

[1] A complete list of each of the Debtors in these 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 these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Compensation Breakdown for Final Period Covered by This Application	
Total professional fees requested in this Application:	$13,629,498.00[2]
Total professional hours covered by this Application:	9,298.0
Average hourly rate for attorneys:	$1,466
Total paraprofessional fees requested in this Application:	$264,023.00
Total actual paraprofessional hours covered by this Application:	527.9
Average hourly rate for paraprofessionals:	$500
Total fees requested in this Application:	$13,893,521.00
Total expense reimbursements requested in this Application:	$300,469.13
Total fees and expenses requested in this Application:	$14,193,990.13

Status of Plan: On December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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]. On December 29, 2025, the effective date under the Debtors' plan occurred.

Primary Benefits: White & Case LLP served as the Committee's general bankruptcy counsel in all aspects of the chapter 11 cases. Among other things, the firm advised the Committee with respect to:

a) Advising the Committee regarding the chapter 11 process, the rights of unsecured creditors, and their fiduciary duties;
b) Keeping the Committee apprised of developments in the chapter 11 cases;
c) Challenging the terms of the Debtors' debtor-in-possession financing, including discovery;
d) Objecting to the Debtors' disclosure statement;
e) Challenging the Debtors' settlement with UnitedHealthcare, including discovery;
f) Investigating the Debtors' prepetition uptier transaction and the validity of liens on the Debtors' assets, including discovery;
g) Litigating motions for derivative standing to prosecute claims arising from the Debtors' prepetition uptier transaction and challenging the validity of liens on the Debtors' assets;
h) Contesting confirmation of the chapter 11 plan, primarily but not exclusively, concerning the value of the Debtors' estates, including discovery with respect to the foregoing; and
i) Advising the Committee on settlement issues.

[2] Throughout the chapter 11 cases, in preparing the Prior Fee Statements and this Application, White & Case reviewed its fees worked and expenses incurred. Following that review, White & Case voluntarily elected to reduce its fees by 377.8 hours totaling $487,911.00, and its expenses by $7,432.84. White & Case will not seek payment for such amounts under this final fee application.

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

In re:	)	
	)	Chapter 11
MODIVCARE, INC, *et al*.[3]	)	
	)	Case No. 25-90309 (ARP)
Debtors.	)	(Jointly Administered)

WHITE & CASE LLP'S FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

TO UNITED STATES BANKRUPTCY JUDGE ALFREDO R. PEREZ:

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases of the debtors and debtors in possession (the "Debtors"), states as follows in support of this final application (this "Application") requesting final allowance and payment of compensation for services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the period from September 9, 2025 through December 29, 2025 (the "Final Period"):

[3] A complete list of each of the Debtors in these 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 these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

JURISDICTION

1. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter under to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper under to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and other bases for the relief requested is section 330 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules"), Paragraph 60 of the *Procedures for Complex Cases in the Southern District of Texas*, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 500] (the "Compensation Procedures Order"), and the Confirmation Order and Plan (each as defined herein).

RELIEF REQUESTED

4. White & Case requests that the Court enter an order granting White & Case final allowance and directing the Debtors to remit payment to White & Case of compensation for services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the Final Period.

PROCEDURAL BACKGROUND

A. The Debtors' Chapter 11 Cases

5. Each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court on August 20, 2025 (the "Petition Date"). The Debtors continued to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner was appointed.

6. On September 5, 2025, the United States Trustee for Region 7 (the "U.S. Trustee") filed *The United States Trustee's Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 124], notifying parties in interest that the U.S. Trustee had appointed the Committee in these chapter 11 cases. For most of these chapter 11 cases, the Committee was comprised of the following members: (a) Wilmington Savings Fund Society, FSB; (b) Madison Avenue International LP; (c) Jupiter Asset Management; (d) Uber Health, LLC; (e) MedEx Medical Transport Service, Inc.; and (f) Marquis Hines.[4]

7. On October 12, 2025, the Court entered the Compensation Procedures Order. [Docket No. 500].

8. On December 15, 2025, (the "Confirmation Date"), the Court entered an order [Docket No. 1055] (the "Confirmation Order") confirming the Plan.

9. On December 29, 2025, the effective date (the "Effective Date") of the Plan occurred. The Plan requires all professionals, including White & Case, to file final applications for services rendered and reimbursement of expenses through the Effective Date no later than forty-five (45) days after the Effective Date. Professionals' fees and expenses of the Committee (and other parties) incurred after the Confirmation Date are subject to the reimbursement provisions of the Plan.

B. Retention of White & Case as Counsel to the Committee and Prior Fee Requests

10. On September 9, 2025, the Committee selected White & Case as its bankruptcy counsel.

11. On October 8, 2025, the Committee filed its *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White*

[4] Randstad North America resigned on October 22, 2025, at which time the Committee was reconstituted [Docket No. 568].

& Case LLP as Counsel Effective as of September 9, 2025 [Docket No. 472] (the "Retention Application").

12. On October 31, 2025, the Court entered an order [Docket No. 616] (the "Retention Order") approving the Retention Application and authorizing the retention of White & Case as bankruptcy counsel to the Committee effective as of September 9, 2025. The Retention Order authorizes White & Case to be compensated on an hourly basis and to be reimbursed for actual and necessary expenses.

13. On November 7, 2025, White & Case filed and served White & Case LLP's *First Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and including September 30, 2025* [Docket No. 684] (the "First Monthly Fee Statement"). In the First Monthly Fee Statement, White & Case sought payment of (i) $2,064,621.60 (80% of $2,580,777.00) as compensation for professional services rendered and (ii) $20,974.54 for reimbursement of expenses. There were no objections to the First Monthly Fee Statement. White & Case received payments of $2,085,596.14 after the objection deadline passed.

14. On December 2, 2025, White & Case filed and served *White & Case LLP's Second Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2025 to and Including October 31, 2025* [Docket No. 882] (the "Second Monthly Fee Statement"). In the Second Monthly Fee Statement, White & Case sought payment of (a) $2,875,109.60 (80% of $3,593,887.00) as compensation for professional services rendered and (b) $32,303.88 for reimbursement of expenses. There were no objections to the Second Monthly Fee Statement. White & Case received payments of $2,907,413.48 after the objection deadline passed.

15. On December 5, 2025, White & Case filed and served *White & Case LLP's Third Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 to and Including November 30, 2025* [Docket No. 957] (the "Third Monthly Fee Statement"). In the Third Monthly Fee Statement, White & Case sought payment of (a) $3,683,445.60 (80% of $4,604,307.00) as compensation for professional services rendered and (b) $93,701.82 for reimbursement of expenses. There were no objections to the Third Monthly Fee Statement. White & Case received payments of $3,777,147.42 after the objection deadline passed.

16. On December 9, 2025, White & Case filed and served *White & Case LLP's First Interim Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including November 30, 2025* [Docket No. 1000] (the "Interim Fee Application"). In the Interim Fee Application, White & Case sought (a) approval of $10,778,971.0 as compensation for professional services rendered and $146,980.24 for reimbursement of expenses, and (b) payment of the unpaid amounts of such approved amounts. There were no objections to the Interim Fee Application. The Court entered an order approving the Interim Fee Application and authorizing the Debtors to disburse any unpaid amounts allowed. [Docket No. 1151]. White & Case received payments of $2,155,794.20 thereafter.

17. On January 26, 2026, White & Case filed and served *White & Case LLP's Fourth Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2025 to and Including December 29, 2025* [Docket No. 1197] (the "Fourth Monthly Fee Statement" and, collectively with the First Monthly Fee Statement, Second Monthly Fee Statement, Third Monthly Fee Statement, the "Prior Fee Statements"). In the Fourth Monthly Fee Statement, White & Case sought payment of (a) $2,491,640.00 (80% of

$3,114,550.00) as compensation for professional services rendered, and (b) $147,671.31 for reimbursement of expenses. There were no objections to the Fourth Monthly Fee Statement. White & Case expects to receive payments of $2,639,311.31 before this Application is heard.

18. In support of this Application, White & Case submits its Prior Fee Statements and Interim Fee Application, previously filed and served in these chapter 11 cases, which are incorporated by reference.

CASE SUMMARY[5]

19. The Debtors' chapter 11 cases presented complex issues on a very short timeline requiring, among other things, a thorough investigation of a liability management exercise consummated only five months prior to the Petition Date and an assessment of the Debtors' untested plan valuation, which initially would have left unsecured creditors entirely out of the money.[6] The Committee's advisors determined that the Debtors' valuation was particularly "cuspy"—meaning that either a successful challenge to the secured creditors' claims or minor adjustments to the Debtors' valuation would put the unsecured creditors' class in the money.

20. At the outset of these chapter 11 cases, the Debtors (based on the milestones set by the Consenting Creditors[7] under a proposed plan that would not provide any recovery for unsecured creditors) sought to confirm a plan and exit chapter 11 within *ninety days* after the Petition Date and only *sixty-nine days* after White & Case's retention as Committee counsel. Once retained, White & Case immediately began working to: (i) evaluate the Debtors' first day motions,

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5 An extensive description of these Chapter 11 Cases is contained within the disclosure statement.

6 The Debtors' initial plan only provided the general unsecured creditor class with a pro rata share of the right (if qualified) to purchase up to $200 million of new common interests pursuant to an equity rights offering. *See Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* [Docket No. 119] (as later amended, the "Plan").

7 "Consenting Creditors" refers to the Debtors' prepetition secured creditors represented by Paul Hastings LLP set forth on Exhibit A to the *Verified Statement Pursuant to Bankruptcy Rule 2019* [Docket No. 791]

including the proposed DIP Facility (as defined below), the Plan, and the Disclosure Statement;[8] (ii) assess the Debtors' proposed valuation, which was not market tested or then-supported by expert work product and was much lower than the valuation for their liability management transaction consummated just six months prior to the Petition Date; and (iii) investigate the prepetition secured creditors' lien package and prepetition transactions, including the recently consummated uptier notes exchange, which came at the expense of the recoveries of a substantial portion of the unsecured creditors in these cases.

21. This was not a small task. For instance, the DIP Facility included a significant backstop fee in the form of twenty percent (20%) of the post-reorganization equity that had already been approved by the Bankruptcy Court at the first day hearing, and the value of which had not yet been determined. The Committee's position was that this provision (along with several other provisions discussed below) created a further risk of depleting value that would otherwise be available to unsecured creditors. In addition, assessing the Debtors' proposed Plan valuation—which was not yet in process as of the Petition Date—required the application of two distinct types of expertise: (i) an evaluation of the Debtors' business plan on a granular, segment-by-segment basis; and (ii) a determination and application of the appropriate valuation methodology.

22. White & Case also conducted a thorough assessment of the Debtors' potential settlement with UnitedHealthcare Insurance Company ("UHC"). The Committee determined it was prudent to evaluate the terms of the UHC Settlement (as defined below) because, among other things, the termination of the UHC relationship would have a direct impact on stakeholder recoveries. The Committee conducted required diligence in keeping with its statutory duties. As further discussed below, the Debtors' relationship with UHC was also a key workstream leading

[8] "Disclosure Statement" refers to the *Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 550].

up to the confirmation hearing, in part because the Debtors did not disclose whether UHC had found replacement parties for their key contracts until after the confirmation hearing had begun.[9]

23. White & Case also investigated potential claims and causes of action related to the Debtor's prepetition transactions. Investigating the prepetition liability management transaction required extensive review of the Debtors' financial condition at various points in time, scrutiny of applicable market factors and the participants' incentives, a valuation of consideration exchanged, and analysis of the legal principles applicable to certain potential claims arising from the transaction. The Committee served targeted discovery relating to these issues. The Debtors' independent director (the "Independent Director") and his counsel, Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn"), tasked with a similar investigation mandate (but on behalf of a different constituency), also served document requests, conducted numerous interviews, reviewed all of the documents produced in responsive to the Committee's requests, and attended the depositions noticed by the Committee regarding the transactions and conduct at issue.

24. White & Case did not represent the members of the Committee in their individual capacity. But the firm was nevertheless forced to address the repercussions for the Committee of unreasonable discovery served on two Committee members by the Debtors and the Consenting Creditors.

25. In just over three months, White & Case reviewed more than 30,000 documents, conducted 14 depositions of representatives for the Debtors (including certain current and former directors and officers) and Consenting Creditors, and held three interviews with the Debtors' management team. White & Case (and the other Committee professionals) worked around the clock to satisfy the Committee's statutory duty to protect the interests of unsecured creditors on

[9] *See* Dec. 8, 2025 Hr'g Tr. (K. Shepard Cross Examination) at 172:12-173:18.

the expedited timeline sought by the Debtors. This was necessary to ensure that unsecured creditors' interests were adequately represented. While Plan recoveries initially provided for *no* recovery to general unsecured creditors, as a result of the Committee's work, the Plan ultimately provided for a distribution to general unsecured creditors of their pro rata share of (i) 2% of the Debtors' new common interests (subject to dilution), new warrants, participation rights in an equity rights offering for eligible holders or (ii) a "cash-out" option for holders of claims less than $1,000,000 for a pro rata share of a pool of cash up to $32 million.

A. Committee Professionals Have Satisfied Their Burden Under Section 330

26. The professional seeking compensation under section 330 of the Bankruptcy Code bears the burden to establish a case in support of the fee award. 11 U.S.C. § 330(a)(3). A professional can satisfy its burden by submitting fee applications with sufficient information for the court to make a determination as to reasonableness. *See In re El Paso Refinery, L.P.*, 257 B.R. 809, 841 (Bankr. W.D. Tex. 2000) ("Normally, the fee application itself sets out evidence sufficient for a prima facie case that the final fee award sought to be approved is both reasonable and necessary within the meaning of the statute."). Once the applicant establishes a *prima facie* case that its fees are reasonable, any objecting party has the burden of demonstrating that specific fee requests are unreasonable. *Castorena v. Mendoza*, 2011 WL 13315708, at *5 (S.D. Tex. Mar. 14, 2011) ("Generalized statements that time spent was unreasonable or unnecessary are not particularly helpful and not entitled to much weight.") (internal quotations omitted). Courts in this District have previously recognized that vague objections to reasonableness do not satisfy this burden. *See, e.g.*, *In re MLCJR, LLC*, Case No. 23-90324 (Bankr. S.D. Tex. Sept. 25, 2024), Hr'g Tr. at 7:22-8:4 (noting that "[a] general complaint that too much time was spent . . . or a fee was too high, or creditors did not substantially recover . . . may not be enough to substantiate an objection").

27. White & Case has satisfied its burden to demonstrate that its fees are reasonable. As further evidenced in the fee applications, the Committee and its professionals played a vital role in ensuring that the rights of all unsecured creditors were fully represented, including through four distinct workstreams.

i. DIP Motion

28. White & Case conducted a comprehensive review of the proposed debtor-in-possession financing (the "DIP Facility") described in the *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] (the "DIP Motion"), which contained several provisions that the Committee viewed as objectionable, including:

a) Outsized fees to the DIP lenders, including the backstop fee equal to 20% of the equity in the reorganized Debtors (noting that the Debtors' own estimated total enterprise value was between $80 million and $126 million);

b) Extension of the DIP liens and adequate protections liens to unencumbered assets, including avoidance actions;

c) A waiver of section 506(c) of the Bankruptcy Code;

d) A waiver of the "equities of the case" exception to section 552(b) of the Bankruptcy Code;

e) A waiver of an ability to advocate for application of the doctrine of marshalling;

f) A compressed timeline for confirmation of the a chapter 11 plan;[10]

[10] The Court ultimately extended the timeline for confirmation of the chapter 11 cases after the Committee filed *The Official Committee of Unsecured Creditors' Emergency Motion for Entry of An Order (I) Scheduling Certain Dates and*

g) A limitation of the Committee's professional fees during the chapter 11 cases;

h) An insufficient $50,000 investigation budget for the Committee;

i) A professional escrow account where the Debtors would be required to borrow and pay interest on cash in escrow to fund the estimated future fees of estate professionals;

j) A stipulation by the Debtors that all of their cash constituted cash collateral of the prepetition secured creditors without any potential for investigation or challenge;

k) An increase in the secured creditors' prepetition interest rate as a form of adequate protection;

l) Confusing (at best) language regarding the ability to keep challenges live during the challenge period;

m) An unqualified right to credit bid for the prepetition agent under the first lien credit agreement (the "Prepetition First Lien Agent");

n) An automatic right for the DIP agent to exercise all remedies against DIP collateral with only a five-day notice period;

o) Full approval to and shield from challenge any and all fees on the DIP Facility paid prepetition; and

p) No requirement to provide notice to the Committee of immaterial amendments to the DIP Facility.

These provisions created a risk of depleting value that would otherwise be available to unsecured creditors and required thorough and careful review.

29. In furtherance of the Committee's statutory duties, White & Case, among other things, carefully reviewed the DIP Motion, the proposed final order to approve the DIP Motion

Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief [Docket No. 484] (the "**Scheduling Motion**").

(the "Final DIP Order") and the DIP Facility's credit agreement (the "DIP Credit Agreement"); conducted a detailed analysis of which entities were obligors and which assets were included or carved out of the proposed financing; assessed the propriety and scope of fees and other charges the Debtors sought to approve; provided proposed revisions to the Final DIP Order; negotiated these revisions with Debtors; conducted legal research related to outstanding issues; reviewed thousands of documents produced by the Debtors in response to the Committee's discovery requests; conducted two depositions of Debtor representatives; prepared the Committee's financial advisor for deposition; defended the deposition of the Committee's financial advisor; drafted and refined the Committee's objection to the DIP Motion [Docket No. 346] (the "DIP Objection"); assisted AlixPartners LLP ("AlixPartners") with its supporting declaration to the DIP Objection [Docket No. 349]; and prepared for the hearing on the Debtors' DIP Motion on September 30, 2025.

30. White & Case's work resulted in a revised proposed Final DIP Order, which, removed the Prepetition First Lien Agent's unqualified right to credit bid, required the DIP agent to seek relief from the automatic stay before exercising any remedies against the DIP Collateral, removed the cap on the Committee's professional fees and increased the Committee's investigation budget.

ii. UHC Settlement

31. All parties agreed from the beginning of these chapter 11 cases that the threatened loss of over $250 million in revenues from UHC would substantially reduce stakeholder recoveries. In response to the potential settlement between UHC and the Debtors described in the *Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related*

Relief [Docket No. 439] (the "UHC Settlement"), the Committee sought informal discovery about UHC and their market reputation for terminating contracts (or threatening to) and then reengaging. During those informal interviews with the Debtors' management, the Debtors confirmed that they could not identify any potential replacement providers.

32. The Committee then served limited discovery to the Debtors (document requests and a deposition notice) and filed a limited objection to the UHC Settlement.[11] White & Case took one deposition of the Debtors' CRO, Chad Shandler. During his deposition, Mr. Shandler testified that (i) the loss of the UHC contracts would put the prepetition lenders under the Debtors' first lien credit agreement (collectively, the "First Lien Lenders") underwater, (ii) the Debtors had not identified potential replacement parties, (iii) he believed that the Debtors would identify the potential replacement parties prior to the termination date, and (iv) management expected that the Debtors would extend their existing contracts if replacement parties did not emerge by the termination date.

33. Given that testimony, the Committee raised the issue to the Court to address the material adverse consequences to the Committee's constituents' recoveries if the UHC contracts reappeared before the termination date or soon thereafter, and also to protect the legitimacy of the overall chapter 11 process. The Debtors did not provide updates to the transition process prior to the October 30, 2025 hearing.[12] The Committee's objection to the UHC Settlement, which it presented at the October 30, 2025 hearing ensured the critical issue of whether the UHC relationship was actually terminating was presented to the Court and protected everyone from

[11] *See The Official Committee of Unsecured Creditors' Preliminary Objection to the Motion of Debtors for Entry of An Order Pursuant to Bankruptcy Rule 9019 (A) Approving A Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* [Docket No. 576] at ¶ 2.

[12] *See* Oct. 30, 2025 Hr'g Tr. at 86:5-87:13.

criticism if UHC reemerged. The Court reserved the Committee's rights to raise the issue at confirmation.[13]

34. The Debtors informed AlixPartners through early December that potential replacement parties were not yet identified.[14] But the Debtors apparently did get that information from a UHC representative shortly before the confirmation trial and the Debtors decided to make the disclosure (through hearsay statements) during the confirmation trial.[15]

iii. Investigation of Claims and Causes of Action

35. At the outset of these chapter 11 cases, the Debtors filed the Plan, which proposed—in exchange for *zero* recovery for unsecured creditors—the cancellation of more than half a billion of unsecured claims, and broad releases for no consideration for their directors, officers, and professionals, as well as those of the Consenting Creditors. This required a comprehensive investigation into potential estate claims and causes of action, including those relating to the liens under the Debtors' secured loans and the Debtors' prepetition transactions. Debtors' counsel, Latham & Watkins LLP ("Latham"), was initially conducting this investigation. But Latham had previously represented the former administrative agent under the prepetition first lien credit agreement.[16] It was only after the Committee was engaged and retained White & Case, and over three weeks after the Petition Date, that the Independent Director engaged Quinn to conduct this investigation.[17]

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13 *See id.* at 103:5-22.

14 *See* Dec. 8, 2025 Hr'g Tr. (K. Shepard Cross Examination) at 172:12-173:18.

15 *See id.*

16 *See Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date* [Docket No. 338-1] ¶ 30. Latham was not involved in the prepetition liability management transaction with the First Lien Lenders. *Id.*

17 *See Declaration of Daniel B. Silvers, Investigating Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 687] at ¶ 8 ("Because Latham formerly represented JPMorgan Chase Bank, N.A., which, until September 2025, had served as the administrative agent under the Company's credit agreement dated as of February 3, 2022…I determined to retain separate counsel to assist me in the Investigation. On

36. White & Case undertook a comprehensive investigation into these matters. Investigations like this are typical in large, complex chapter 11 cases, especially those involving failed liability management transactions that were consummated by the Debtors prior to the Petition Date. Assessing the viability of, and seeking standing to prosecute, claims and causes of action were especially important because they could have been the sole source of recovery for unsecured creditors, which were slated to receive nothing under the proposed Plan. For example, a successful challenge to the liability management transaction would have resulted in distribution to unsecured creditors with only minor adjustments to the Debtors' valuation.

37. In connection with the Lien Challenge (as defined below), White & Case reviewed the prepetition first lien and second lien loan documents and related collateral packages; analyzed the Debtors' unperfected assets; and conducted thorough lien perfection reviews for each Debtor, including specialized reviews related to the liens on the Debtors' intellectual property. Recognizing the unique challenges posed by the Debtors' healthcare-related assets, White & Case also researched perfection requirements for Medicare and Medicaid receivables. To further support the Lien Challenge, White & Case conducted numerous depositions and interviews to understand the Debtors' business operations and the extent to which post-petition revenue was generated by post-petition labor. Ultimately, the Committee found colorable claims in connection with the Lien Challenge and White & Case drafted and litigated the *Committee's Omnibus Claim Objection and Lien Challenge Standing Motion* [Docket No. 729] and the *First Supplement to the Committee's Omnibus Claim Objection and Lien Challenge Standing Motion* [Docket No. 806], which necessitated significant preparation in advance of the confirmation hearing.

September 15, 2025, at my direction, the Company retained Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel") for that purpose.").

38. The Committee also investigated sophisticated and complex prepetition transactions between the Debtors and their secured lenders, which demanded the highest level of diligence and expertise. Five months prior to the Petition Date, the Debtors completed an uptier transaction that increased their secured debt to approximately $1.7 billion through a dollar-for-dollar exchange of $271 million of unsecured notes for second-lien secured notes. As part of the investigation, White & Case deposed one of the Debtors' former independent board members who testified that the Debtors' management and restructuring advisors "seemed to be focused on . . . getting into bankruptcy" and the prospect of bankruptcy "overshadowed each and every aspect of what was happening" throughout his tenure on the board.[18]

39. The Committee had no choice but to thoroughly explore these issues. Accordingly, in connection with the Uptier Challenge (as defined below), White & Case conducted legal research into potential causes of action; conducted extensive discovery on the Debtors and First Lien Lenders, including reviewing thousands of documents relating to the Debtors' prepetition transactions and deposing several of the Debtors' former and current officers and directors; together with the Committee's financial advisor, analyzed the value of the consideration exchanged in the transactions; and drafted and litigated the Uptier Challenge [Docket No. 975]. White & Case also reviewed and researched potential causes of action related to the payments of prepetition bonuses and severance packages to Company employees.

40. White & Case also analyzed the adequacy of the Independent Director's own investigation into the Debtors' prepetition transactions, along with his associated conclusions and recommendations, to adequately assess the Debtors' exercise of their business judgment in granting broad releases under the Plan. This involved additional discovery and trial preparation,

[18] Gonzales Dep. Tr, 196:14-197:23.

along with a repeated need to seek Court intervention regarding the timing of the Independent Director's disclosures and assertions of privilege. The latter dispute ultimately resulted in the Court partially sustaining the Committee's objection to certain aspects of the Independent Director's testimony regarding the his investigation and conclusions.[19]

iv. Plan

41. White & Case conducted a thorough review and analysis of the Plan, Disclosure Statement, and Plan Supplement,[20] ensuring that all provisions were scrutinized for their impact on unsecured creditors. The valuation of the Debtors' business was at the center of these chapter 11 cases. The Debtors and the Consenting Creditors initially filed a Plan that provided no recovery to unsecured creditors without even conducting an expert valuation, much less a valuation that had been market tested. The Committee was required to hire its own experts to assess the Debtors' underlying business plan—which assessed each of the Debtors' operative business segments—and to determine and apply the appropriate valuation methodology to independently conclude whether the Debtors' presumption that unsecured creditors were out of the money was correct.

42. The Committee's experts found that it was not. With only certain adjustments to the business plan and taking appropriate valuation methodologies into account, the Committee believed that there could have been enough value to satisfy claims of the First Lien Lenders and the prepetition noteholders under the Debtors' second lien notes, with residual value flowing to

[19] *See, e.g.*, Dec. 8, 2025 Hr'g. Tr. (D. Silvers' Direct Testimony) at 203:3-207:24; 220:18-24; 221:20-222:19; 223:16-21; 230:24-231:15.

[20] "**Plan Supplement**" refers, collectively to the *Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 725], *Notice of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 802], *Notice of Filing of Third Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 961], *Notice of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 1030], *Notice of Filing of Fifth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 1094], and *Notice of Filing of Sixth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 1130].

unsecured creditors.[21] This was without even considering any additional value that could have been recovered from the Lien Challenge and Uptier Challenge. Those challenges, if successful, would have showed that the Plan was incorrectly premised on the First Lien Lenders' secured claim being $881 million, which would have required a revision of the equity splits and, therefore, enhanced the proposed recovery to unsecured creditors.

43. White & Case conducted legal research related to the approval of the Plan and Disclosure Statement; closely examined the Independent Director's investigation and the scope and propriety of the Plan's proposed releases; drafted and filed the Disclosure Statement Objection (as defined below) and a supporting declaration [Docket No. 422]; assisted AlixPartners with the Committee's expert reports regarding the Debtors' business plan and valuation; and drafted and filed the Plan Objection (as defined below), advocating for the interests of unsecured creditors in light of the Plan's proposed treatment. In addition, the Committee provided numerous comments to the Debtors' pleadings and negotiated certain issues encompassed in the final orders for the Solicitation Procedures and Plan.

44. After extensive, good faith attempts to reach a consensual resolution, White & Case prepared for and participated in the multi-day hearing on the confirmation of the Plan, as well as the Uptier Challenge and Lien Challenge. Among other things, White & Case drafted the pleadings; prepared and conducted direct examinations, cross-examinations of each of the Debtors' witnesses, and oral argument; and finalized and negotiated exhibit lists and deposition designations. The four-day hearing included testimony by eight witnesses, including two Committee experts. The Court specifically found that the Committee's valuation expert testimony

[21] Mr. Gonzales testified that a "consistent problem with FTI" throughout his tenure on the board was that their forecasts were almost "always lower than actual." *See* Gonzales Dep. Tr. 121:8-12,. Mr. Gonzales testified to his belief that FTI's forecasts were low "80 or 90 percent" of the time and it was a "pattern" that he saw in their projections. *Id.* at 121:13-18; 173:20-24.

was credible.[22] White & Case's efforts were instrumental in ensuring that the Committee's voice was heard and that the interests of unsecured creditors were represented in a case where their recovery was initially non-existent. Ultimately, in part based on the work of the Committee's professionals, the recovery for general unsecured creditors increased to provide for (i) a pro rata share of 2% of the reorganized equity, a warrant package and participation rights for eligible holders in an equity rights offering, or (ii) for holders of claims less than $1,000,000, a "cash-out" option for a pro rata share of a $32 million pool.

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45. Throughout these chapter 11 cases, White & Case has filed thousands of pages of detailed time entries, all of which have been approved on an interim basis without formal objection from any party.[23] White & Case has been consistently transparent in its fee applications, providing the information and detail necessary for a presumption of reasonableness. White & Case has satisfied the standards for final allowance and payment of its fees.

TERMS AND CONDITIONS OF EMPLOYMENT AND COMPENSATION

46. The terms and conditions of White & Case's employment by the Debtors and compensation to be paid to White & Case by the Debtors are outlined in the Retention Application and Retention Order. Post-petition compensation paid to White & Case by the Debtors has been paid from the Debtors' estates, in accordance with the Compensation Procedures Order and applicable bankruptcy law.

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[22] Dec. 12, 2025 Hr'g. Tr. at 8:21-24.

[23] The Consenting Creditors filed a *Reservation of Rights of the Consenting Creditors With Respect to White & Case LLP's First Monthly Fee Statement For Allowance of Compensation And Reimbursement of Expenses For the Period From September 9, 2025 to and Including September 30, 2025, and First Monthly Fee Statement of Alixpartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, For Allowance Of Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For the Period From September 10, 2025 Through September 30, 2025* [Docket No. 753], but did not file a formal objection.

PROFESSIONAL SERVICES PROVIDED BY WHITE & CASE TO THE COMMITTEE

47. White & Case has assisted the Committee in all matters in these chapter 11 cases. In support of this Application, White & Case submits the following:

A. A proposed final order allowing compensation and reimbursement of expenses in the form located on the Court's website.

B. With respect to the period from September 9, 2025 to December 29, 2025:

a. Detailed statements of White & Case's hours expended and fees earned are attached to the Prior Fee Statements, filed at Docket Nos. 684, 882, 957, and 1197;

b. A summary of White & Case's hours expended and fees earned grouped by timekeeper (attorneys and paraprofessionals), attached hereto as **Exhibit A**;

c. A summary of White & Case's hours expended and fees earned grouped by billing category only, attached hereto as **Exhibit B**;

d. A summary of White & Case's hours expended, and fees earned grouped by billing category and then by timekeeper (attorneys and paraprofessionals), attached hereto as **Exhibit C**;

e. Detailed statements of White & Case's expenses incurred are attached to the Prior Fee Statements, filed at Docket Nos. 684, 882, 957, and 1197. An additional detailed statement of White & Case's expenses incurred through December 29, 2025, but not included in the Prior Fee Statements, is attached hereto as **Exhibit D**; and

f. A summary of White & Case's expenses incurred is attached hereto as **Exhibit E**.

C. A summary chart disclosing the customary and comparable compensation is attached hereto as **Exhibit F**.

D. A certification by Gregory F. Pesce, a partner of White & Case, is attached hereto as **Exhibit G**.

48. The following is a brief narrative summary, by project category, of the most significant professional services provided by White & Case to the Committee during the Final

Period.[24] These descriptions—together with the time detail attached to its Prior Fee Statements—demonstrate that White & Case was heavily involved in performing services for the Committee on a daily basis, often including night and weekend work,[25] to meet the needs of the Committee in these chapter 11 cases.

No.	Category Name
	Brief Narrative Summary
B01	**Adversary Proceedings**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to potential adversary proceedings to be initiated by the Committee, which are summarized in greater detail in B16 and B17.
B02	**Asset Analysis, Sale & Disposition**
	White & Case attorneys analyzed the exhibits contained in the Plan Supplement referencing the sale and disposition of assets [Docket Nos. 725, 802, 961, 1030].
B03	**Automatic Stay Issues**
	White & Case attorneys worked on various matters including analyzing and assessing the various motions for relief from automatic stay filed in the chapter 11 cases [Docket Nos. 471, 657].
B04	**Case Administration**
	White & Case attorneys and paraprofessionals worked on various matters related to the management of the chapter 11 cases, including monitoring the docket, maintaining a case calendar of upcoming deadlines, and addressing and monitoring work in progress. White & Case attorneys corresponded and met regularly regarding the progress and current status of ongoing workstreams to ensure work was not being duplicated.
B05	**Case Strategy**
	Throughout the chapter 11 cases, White & Case attorneys advised the Committee with respect to strategy on several issues, including, but not limited to: (1) certain pending motions; (2) strategy related to DIP Financing & Cash Collateral [*see* project category B11]; (3) strategy related to Discovery [*see* project category B12]; (4) strategy related to the Plan

[24] The summary herein is divided according to the project categories that White & Case created to best reflect the categories of tasks that it was required to perform during the chapter 11 cases. Nevertheless, under the circumstances, and given the interconnectedness of the issues in the chapter 11 cases, certain of these categories may overlap with one another.

[25] Approximately 15.5% of the hours billed were billed on a Saturday or a Sunday.

	and Disclosure Statement [*see* project category B13]; and (5) strategy related to the Investigations and Lien Challenge [*see* project categories B16 and B17]; and (6) strategy related to potential settlement [*see* project categories B18]. Further, White & Case attorneys discussed many of the foregoing issues with the Debtors, the Consenting Creditors, and their respective advisors.
B06	**Cash Management & Intercompany Issues**
	White & Case attorneys and paraprofessionals worked on various matters related to Cash Management and Intercompany Issues, including: (1) analyzing and conducting research related to the Debtors' cash management motion and critical vendor motions [Docket Nos. 6, 16, 280] (collectively, the "Cash Management Motion and Critical Vendor Motion"); (2) revising the proposed final orders granting the Cash Management Motion and Critical Vendor Motion, then approved by the Court [Docket Nos. 334, 388, 394]; and (3) attending to calls and correspondence with Debtors' counsel regarding the Cash Management Motion and Critical Vendor Motion.
B07	**Claims Administration & Objections**
	Throughout the chapter 11 cases, White & Case attorneys worked on various matters related to the administration of claims in the chapter 11 cases, including, but not limited to (1) analyzing proofs of claim; (2) reviewing AlixPartners' analysis of the claims filed in the chapter 11 cases; (3) analyzing the Consenting Creditors' proofs of claim; (4) researching claim objection procedures; and (5) preparing the Lien Challenge Standing Motion (as defined herein), which is discussed in greater detail in B17.
B08	**Committee Meetings & Communications**
	Throughout the chapter 11 cases, White & Case attorneys (1) streamlined the Committee's financial advisor pitching process; (2) drafted the Committee's bylaws; (3) worked with AlixPartners in preparing weekly presentations to the Committee regarding the chapter 11 cases; (4) organized and attended weekly meetings with the Committee; (5) prepared minutes of weekly meetings with the Committee; and (6) maintained constant communication with Committee members throughout the chapter 11 cases.
B09	**Corporate, Securities & Regulatory Issues**
	Throughout the chapter 11 cases, White & Case attorneys analyzed the exhibits and revisions thereto contained in the Plan Supplement and conferred on various corporate, securities and regulatory issues [Docket Nos. 725, 802, 961, 1030].
B10	**Creditor Communications**
	Throughout the chapter 11 cases, White & Case attorneys met and conferred with counsel to the Consenting Creditors, communicated with individual Committee members regarding discussions with other constituents in the chapter 11 cases, and communicated with individual unsecured creditors regarding general case information.

B11	**DIP Financing & Cash Collateral**
	White & Case attorneys undertook various workstreams related to the Debtors' DIP Motion, including, but not limited to: (1) reviewing the DIP Motion; (2) analyzing the DIP Credit Agreement; (3) analyzing the entities obligated under the DIP Credit Agreement; (4) analyzing the assets included and excluded from the DIP Credit Agreement; (5) assessing the propriety of the various fees sought to be approved by the DIP Motion; (6) revising the Debtors' proposed Final DIP Order in order to resolve the Committee's issues; (7) meeting and conferring with the Debtors regarding the Committee's revisions to the proposed Final DIP Order; (8) drafting the DIP Objection, which was filed on September 23, 2025 [Docket No. 346]; (9) conducting various research workstreams in preparation of the DIP Objection; (8) conferring with AlixPartners and assisting in the preparation and filing of their declaration in support of the DIP Objection, which was filed on September 23, 2025 [Docket No. 349].
B12	**Discovery**
	Throughout the chapter 11 cases, White & Case attorneys undertook extensive discovery, including discovery related to the liens asserted on the Debtors' assets, the Debtors' prepetition transactions, the Debtors' DIP Motion, the Debtors' Plan and Disclosure Statements, and the UHC Settlement. Such discovery included reviewing over 30,000 documents, preparing for and conducting fourteen depositions, defending three depositions, and interviewing Company witnesses. Throughout this process, White & Case attorneys attended to various discovery disputes with the Debtors and Consenting Creditors, including by: (1) preparing for and attending several meet and confers and exchanging correspondences regarding their document productions; (2) negotiating interim deadlines and litigating an appropriate scheduling order; and (3) corresponding with Quinn, counsel to the Independent Director, regarding the Independent Director's investigation, and litigating remaining issues with the aid of this Court.
B13	**Exclusivity, Plan & Disclosure Statement**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to the Plan and Disclosure Statement, including, but not limited to: (1) reviewing the Plan, Disclosure Statement, and Plan Supplement; (2) analyzing the Independent Director's investigation and the Plan's proposed releases; (3) conducting various research related to approval of the Disclosure Statement; (4) drafting, finalizing, and filing the Committee's objection to the Disclosure Statement, which was filed on October 2, 2025 [Docket No. 421] (the "Disclosure Statement Objection"); (5) drafting, finalizing, and filing the declaration in support of the Disclosure Statement Objection, which was filed on October 2, 2025 [Docket No. 422]; (6) attending to various internal meetings and external calls with AlixPartners and the Committee regarding the Disclosure Statement Objection; (7) drafting, finalizing, and filing the Scheduling Motion, which was filed on October 9, 2025 [Docket No. 484]; (8) meeting with the Debtors and finalizing the agreed-upon order regarding the scheduling of confirmation dates and deadlines, which was filed on October 15, 2025 [Docket No. 546]; (9) conducting various research related to confirmation of the Plan; (10) drafting, finalizing, and filing the Committee's objection to confirmation of the

	Plan, which was filed on November 25, 2025 [Docket No. 851] (the "Plan Objection"); (11) attending to various internal meetings and external calls with AlixPartners and the Committee regarding the Plan Objection; and (12) preparing for the multi-day hearing on confirmation of the Plan.
B14	**Executory Contracts & Unexpired Leases**
	White & Case attorneys analyzed and assessed the Debtors' assumed and rejected executory contracts.
B15	**Hearings & Court Matters**
	Throughout the chapter 11 cases, White & Case attorneys and paraprofessionals prepared for and attended various hearings and status conferences, including, but not limited to: the contested DIP hearing on September 30, 2025; the Court's ruling on the DIP Motion on October 3, 2025; the status conference on the Confirmation schedule on October 10, 2025; the hearing on the UHC Settlement on October 30, 2025; hearings and status conferences regarding the Independent Director's declarations on November 21, 2025, November, 25, 2025, and December 3, 2025; and the contested Confirmation hearing from December 8, 2025 through December 12, 2025.
B16	**Investigation of Causes of Action**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to the investigation of causes of action, including, but not limited to: (1) reviewing the first lien and second lien credit documents and collateral packages; (2) analyzing the Debtors' unperfected assets; (3) conducting lien perfection reviews with respect to each Debtor; (4) conducting IP lien perfection reviews with respect to each Debtor; (5) researching perfection requirements with respect to Medicare and Medicaid Receivables; (6) researching perfection requirements with respect to cash and motor vehicles; (7) researching the application of section 552 of the Bankruptcy Code and its exceptions; (8) conducting various depositions and interviews with respect to the Debtors' business and the extent post-petition revenue is derived from post-petition labor; (9) drafting, finalizing and filing the Committee's Omnibus Claim Objection and Lien Challenge Standing Motion, which was filed on November 14, 2025 [Docket No. 729] (the "Lien Challenge Standing Motion"); (10) drafting, finalizing and filing the First Supplement to the Committee's Omnibus Claim Objection and Lien Challenge Standing Motion, which was filed on November 24, 2025 [Docket No. 806] (together with the Lien Challenge Standing Motion, the "Lien Challenge"); (11) analyzing the Debtors' and Consenting Creditors' replies to the Lien Challenge [Docket Nos. 921, 923, 925]; (12) drafting, finalizing and filing the Committee's Reply in Support of the Lien Challenge, which was filed on December 7, 2025 [Docket No. 975]; (13) analyzing the Debtors' prepetition transactions; (14) analyzing the Debtors' prepetition credit documents; (15) reviewing AlixPartners' analysis of the Debtors' prepetition transactions; (16) conducting various research workstreams related to the Debtors' prepetition transactions; (17) reviewing the Debtors' prepetition payments of bonuses and other compensation; (18) preparing for various depositions regarding the Debtors' prepetition transactions; (19) analyzing the Independent Director's declarations

	regarding the investigation into the Debtors' prepetition transactions [Docket Nos. 687, 803]; (20) drafting, finalizing and filing the Committee's Uptier Challenge Standing Motion, which was filed on November 14, 2025 [Docket No. 728] (the "Uptier Challenge"); (21) analyzing the Debtors' and Consenting Creditors' replies to the Uptier Challenge [Docket Nos. 921, 923, 925]; (22) drafting, finalizing and filing the Committee's Reply in support of the Uptier Challenge which was filed on December 7, 2025 [Docket No. 974]; and (23) attending to various internal calls and calls with AlixPartners and the Committee regarding the Lien Challenge and Uptier Challenge. Due to the nature of the investigations, there was extensive overlap between project categories B16 and B17.
B17	**Lien Challenge**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to Lien Challenge, including, but not limited to: (1) reviewing the first lien and second lien credit documents and collateral packages; (2) analyzing the Debtors' unperfected assets; (3) attending to various calls with AlixPartners' regarding analysis of the Debtors' perfected and unperfected assets; (4) researching the extent of perfection with respect to Medicare and Medicaid Receivables; (5) researching the application of section 552 of the Bankruptcy Code and its exceptions; (6) drafting, finalizing and filing the Lien Challenge [Docket Nos. 729, 806]; (7) analyzing the Debtors' and Consenting Creditors' replies to the Lien Challenge [Docket Nos. 921, 923, 925]; and (8) drafting, finalizing and filing the Committee's Reply in Support of the Lien Challenge, which was filed on December 7, 2025 [Docket No. 975]. Due to the nature of the Lien Challenge, there was extensive overlap between project categories B16 and B17.
B18	**Mediation**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to mediation and settlement efforts with the Debtors, including, but not limited to: (1) attending meetings internally and with AlixPartners for settlement meeting preparations; (2) attending meetings with the Committee regarding the status of settlements; (3) analyzing the Plan, Disclosure Statement and liquidation analysis in preparation for settlement meeting [Docket Nos. 445, 446, 452]; (4) preparing materials for settlement meetings; (5) attending calls with Debtors' and Consenting Creditors' professionals regarding settlement meetings; (5) attending settlement meetings; (6) analyzing and assessing settlement proposals; and (7) preparing settlement counterproposals.
B19	**Non-Working Travel**
	White & Case attorneys traveled to/from Houston, Texas to attend Court hearings.
B20	**Professional Retention & Fees – W&C**

	Throughout the chapter 11 cases, White & Case attorneys and paraprofessionals undertook various workstreams related to its retention and fees, including, but not limited to: (1) preparing and filing a retention application for White & Case [Docket No. 562], which retention was approved by the Court on October 31, 2025 [Docket No. 616]; (2) addressing issues raised by the U.S. Trustee with respect to White & Case's retention; (3) preparing and filing a supplemental declaration in support of White & Case's retention [Docket No. 593]; (4) preparing and filing additional supplemental declarations in support of retention [Docket Nos. 964, 956, 1079]; (5) preparing and filing four Monthly Fee Statements [Docket Nos. 684, 882, 957, 1197], preparing and filing one Interim Fee Application [Docket No. 1000], and this Application; and (5) addressing certain budgetary and fee estimate issues.
B21	**Professional Retention & Fees – Other**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to other professionals' retention and fees, including, but not limited to: (1) analyzing and filing the retention application for AlixPartners [Docket No. 473], which retention was approved by the Court on November 4, 2025 [Docket No. 654]; (2) analyzing and filing the supplemental declaration in support of AlixPartners' retention [Docket No. 643]; (3) analyzing and filing AlixPartners' three Monthly Fee Statements [Docket Nos. 666, 897, 1086]; (3) analyzing the retention applications for the Debtors' professionals; and (4) conferring internally and with the Debtors with respect to their retention applications.
B22	**Reports, Schedules & US Trustee Issues**
	Throughout the chapter 11 cases, White & Case attorneys worked on various matters, including preparing for and attending the Section 341 Meeting, analyzing the Debtors' Schedules and Statements of Financial Affairs, and reviewing AlixPartners' analysis of the Debtors' schedules and statements of financial affairs.
B23	**Tax Issues**
	Throughout the chapter 11 cases, White & Case attorneys worked on various tax-related matters.

49. In the ordinary course of White & Case's practice, White & Case maintains a record of expenses incurred in the rendition of professional services required by the Committee for which reimbursement is sought. As noted above, a summary of White & Case's expenses is attached as **Exhibit E**, with the detailed statement of same attached to the Prior Fee Statements and hereto as **Exhibit D**. The expenses incurred for which White & Case seeks reimbursement include, but are not limited to, discovery and e-discovery expenses, travel expenses, and printing expenses. These

charges are intended to reimburse White & Case's direct operating costs, which are not incorporated into White & Case's hourly billing rates. White & Case charges external costs at the vendor's cost without markup.

50. Although White & Case has made every effort to include all fees earned and expenses incurred during the Final Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Final Period. White & Case reserves the right to make further applications or to supplement this Application to this Court for allowance of such fees and expenses not included herein.

ALLOWANCE OF THE FEES AND EXPENSES

51. In this Application, White & Case seeks final allowance and payment of compensation for professional services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the Final Period.

52. The blended rates for all White & Case timekeepers for the Final Period is $1,414.

53. In support of the Application, White & Case relies upon its Prior Fee Statements and Interim Fee Application, which are incorporated herein by reference.

54. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code (such as counsel to the Committee) "reasonable compensation for actual, necessary services rendered . . . [and] reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A)-(a)(1)(B). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

> In determining the amount of reasonable compensation to be awarded . . . , the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

> (a) the time spent on such services;
>
> (b) the rates charged for such services;
>
> (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
>
> (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
>
> (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
>
> (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

55. The Application readily meets the standards of section 330 and applicable case law for compensation for services rendered on behalf of the Committee.

56. White & Case respectfully submits that the foregoing professional services for which it seeks compensation in this Application were, at the time rendered, reasonable, necessary for, beneficial to, and appropriate to the Committee, the Debtors, their estates, and the administration of these chapter 11 cases. White & Case further believes that it performed the services for the Committee economically, effectively, and efficiently, and the results obtained benefited not only the Committee and its constituents, but also the Debtors' estates. White & Case further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Committee and all parties in interest.

57. During the Final Period, White & Case's U.S. hourly billing rates for attorneys (though not necessarily billed to the Debtors' estates) ranged from $870 to $2,500. The hourly rates and corresponding rate structure utilized by White & Case in these chapter 11 cases are equivalent to the hourly rates and corresponding rate structure used by White & Case for

restructuring, workout, bankruptcy, insolvency, and comparable matters, and similar complex corporate, securities, and litigation matters, whether in court or otherwise, regardless of whether a fee application is required. White & Case strives to be efficient in the staffing of matters. These rates and the rate structure reflect that such matters are typically national in scope and involve great complexity, high stakes, and severe time pressures—all of which were present in these chapter 11 cases.

58. Moreover, White & Case's hourly rates are set at a level designed to compensate White & Case fairly for the work of its attorneys and paraprofessionals and to cover certain fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of the individuals assigned. These hourly rates are subject to periodic adjustments to reflect economic and other conditions and are consistent with the rates charged elsewhere.

59. Over 83% of the hours worked were by attorneys within White & Case's Financial Restructuring and Insolvency Practice, a practice which enjoys a national and international reputation for its expertise in financial restructurings. Overall, White & Case brings to these chapter 11 cases a particularly high level of skill and knowledge, which inured to the benefit of the Committee and all parties in interest.

60. In conclusion, the services provided by White & Case have been necessary to the Committee's role in these chapter 11 cases during the Final Period, and were beneficial at the time at which the services were rendered toward the successful prosecution of the unsecured creditors' interests in these chapter 11 cases. Further, White & Case performed the services within a reasonable amount of time commensurate with the complexity, importance, nature of the problems, issues, and tasks addressed on behalf of the Committee. Finally, the compensation sought is reasonable based on the customary compensation charged by comparably skilled practitioners in

chapter 11 cases. White & Case requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered.

61. As a result of the services provided, White & Case incurred expenses which it billed. The disbursements for such services are not included in White & Case's overhead for the purpose of setting billing rates and White & Case has made every effort to minimize its disbursements in these chapter 11 cases. The actual expenses incurred in providing professional services were necessary, reasonable, and justified under the circumstances to serve the needs of the Debtors in these chapter 11 cases. Among other things, White & Case makes sure that all expenses for which it seeks reimbursement were reasonable and appropriate.

WHEREFORE, White & Case requests that this Court enter an order granting final allowance and payment of compensation for professional services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the Final Period.

Dated: February 12, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on February 12, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Summary of Total Hours and Fees by Timekeeper

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Abouhashish, Salma	Associate	2023	Pool Associates - Corporate	16.0	$870.00	$13,920.00
Ahmed, Heidi	Associate	2024	Capital Markets Practice	6.0	$990.00	$5,940.00
Aquije, Alonso	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	157.1	$1,110.00	$174,381.00
Bagdasarian, Amy	Associate	2003	Debt Finance Practice	13.9	$1,580.00	$21,962.00
Beil, Ryan	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	378.2	$1,280.00	$484,096.00
Binuya, Sebastian Angelo	Litigation Specialist	N/A	Practice Technology - Disputes	0.5	$420.00	$210.00
Bourgault, Jacob	Associate	2025	Pool Associates - Corporate	593.3	$870.00	$516,171.00
Chase, Ashley	Associate	2016	Financial Restructuring & Insolvency (FRI) Practice	693.7	$1,580.00	$1,096,046.00
Chemborisov, Gleb	Litigation Specialist	N/A	Timekeeper Pool	68.8	$490.00	$33,712.00
Chen, Ken	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	79.5	$490.00	$38,955.00
Chen, Tony	Manager of Litigation Support	N/A	Timekeeper Pool	3.2	$490.00	$1,568.00
Chitwan, Charu	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	332.7	$1,110.00	$369,297.00
Dreier, David	Partner	1995	Tax Practice	0.8	$2,350.00	$1,880.00
Ericksen, A.J.	Partner	2005	Securities Practice	15.4	$2,200.00	$33,880.00
Fajar, Jimmy	Associate Director	N/A	Timekeeper Pool	1.4	$540.00	$756.00
Feld, Elizabeth	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	7.3	$1,790.00	$13,067.00
Galvan, Paolo	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	1.0	$420.00	$420.00
Gee, Steven	Partner	2009	Tax Practice	1.4	$1,900.00	$2,660.00
Gorsich, Ronald	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	2.5	$1,900.00	$4,750.00
Graham, Richard	Counsel	2003	Financial Restructuring & Insolvency (FRI) Practice	1.1	$1,630.00	$1,793.00
Greissman, Scott	Partner	1995	Financial Restructuring & Insolvency (FRI) Practice	411.3	$2,500.00	$1,028,250.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	59.7	$490.00	$29,253.00
Hong, Alice	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	448.6	$1,370.00	$614,582.00
Isaac, Chantal	Associate	N/A	Pool Associates - Corporate	223.2	$870.00	$194,184.00
Kakani, Bhavini	Associate	2025	Litigation Practice	257.3	$870.00	$223,851.00
Kates, Paula	Associate	2020	Litigation Practice	7.4	$1,370.00	$10,138.00
Koster, Charles	Partner	2009	Financial Restructuring & Insolvency (FRI) Practice	110.2	$1,900.00	$209,380.00

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Lingle, Barrett	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	159.8	$1,370.00	$218,926.00
Litz, Dominic	Associate	2018	Financial Restructuring & Insolvency (FRI) Practice	349.1	$1,370.00	$478,267.00
Ludovici, Stephen	Staff Attorney	2014	Financial Restructuring & Insolvency (FRI) Practice	70.6	$1,110.00	$78,366.00
Lupinacci, Frank	Partner	2008	M&A - Private Equity Practice	18.1	$1,900.00	$34,390.00
Magnaye, Maclin	Litigation Specialist	N/A	Practice Technology - Disputes	1.0	$420.00	$420.00
Mago, Don	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	295.4	$990.00	$292,446.00
McNary, Mary Jane	Legal Assistant	N/A	Litigation Practice	1.2	$420.00	$504.00
Miranda, Loredana	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	787.6	$1,220.00	$960,872.00
Morales, Jon	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	0.5	$490.00	$245.00
Pados, Gyorgy	Associate Director	N/A	Timekeeper Pool	3.3	$540.00	$1,782.00
Pesce, Gregory	Partner	2011	Financial Restructuring & Insolvency (FRI) Practice	211.8	$2,100.00	$444,780.00
Quintana, Anastasia	Associate	N/A	Pool Associates - Litigation	203.5	$870.00	$177,045.00
Rai, Parm	Associate	2024	Debt Finance Practice	23.8	$1,110.00	$26,418.00
Sachdev, Varoon	Associate	2018	Financial Restructuring & Insolvency (FRI) Practice	262.0	$1,420.00	$372,040.00
Shore, Christopher	Partner	1992	Financial Restructuring & Insolvency (FRI) Practice	534.9	$2,500.00	$1,337,250.00
Silnicki, Graham	Associate	2013	Debt Finance Practice	19.8	$1,470.00	$29,106.00
Slattery, Christine	Legal Assistant	N/A	Debt Finance Practice	26.2	$700.00	$18,340.00
Smith, Erin	Counsel	2014	Financial Restructuring & Insolvency (FRI) Practice	604.3	$1,630.00	$985,009.00
Venes, Aileen	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	61.5	$490.00	$30,135.00
Walz, Jacko	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	481.9	$870.00	$419,253.00
West, Colin	Partner	2008	Financial Restructuring & Insolvency (FRI) Practice	326.1	$1,790.00	$583,719.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	218.3	$490.00	$106,967.00
Yoo, Jade	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	206.5	$1,370.00	$282,905.00
Yu, Emily	Legal Assistant	N/A	Litigation Practice	1.8	$420.00	$756.00
Zahiremami, Golshid	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	345.2	$990.00	$341,748.00
Zakia, Jason	Partner	1999	Financial Restructuring & Insolvency (FRI) Practice	343.1	$2,200.00	$754,820.00
Zatz, Andrew	Partner	2008	Financial Restructuring & Insolvency (FRI) Practice	377.1	$2,100.00	$791,910.00
Grand Total				**9,825.9**		**$13,893,521.00**

Exhibit B

Summary of Total Hours and Fees by Billing Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B01	Adversary Proceedings	8.8	$7,656.00
B02	Asset Analysis, Sale & Disposition	1.4	$2,660.00
B03	Automatic Stay Issues	4.5	$8,161.00
B04	Case Administration	154.8	$131,812.00
B05	Case Strategy	268.2	$500,054.00
B06	Cash Management & Intercompany Issues	24.0	$42,195.00
B07	Claims Administration & Objections	35.2	$44,656.00
B08	Committee Meetings & Communications	207.8	$364,318.00
B09	Corporate, Securities & Regulatory Issues	14.4	$26,733.00
B10	Creditor Communications	11.7	$19,821.00
B11	DIP Financing & Cash Collateral	503.1	$828,944.00
B12	Discovery	3,328.9	$4,295,633.00
B13	Exclusivity, Plan & Disclosure Statement	1,971.8	$2,759,882.00
B14	Executory Contracts & Unexpired Leases	8.3	$8,328.00
B15	Hearings & Court Matters	705.0	$1,251,067.00
B16	Investigation of Causes of Action	2,027.9	$2,807,492.00
B17	Lien Challenge	121.0	$139,526.00
B18	Mediation	186.8	$353,426.00
B19	Non-Working Travel	37.4	$66,382.00
B20	Professional Retention & Fees - W&C	167.8	$184,752.00
B21	Professional Retention & Fees - Other	29.0	$35,490.00
B22	Reports, Schedules & US Trustee Issues	5.7	$9,573.00
B23	Tax Issues	2.4	$4,960.00
	Grand Total	**9,825.9**	**$13,893,521.00**

Exhibit C

Summary of Total Hours and Fees by Billing Category and Timekeeper

Cat. No. Project Category Description Name	Hours	Fees
B01	**8.8**	**$7,656.00**
Adversary Proceedings	**8.8**	**$7,656.00**
Bourgault, Jacob	8.8	$7,656.00
B02	**1.4**	**$2,660.00**
Asset Analysis, Sale & Disposition	**1.4**	**$2,660.00**
Lupinacci, Frank	1.4	$2,660.00
B03	**4.5**	**$8,161.00**
Automatic Stay Issues	**4.5**	**$8,161.00**
Gorsich, Ronald	2.5	$4,750.00
Litz, Dominic	1.3	$1,781.00
Shore, Christopher	0.4	$1,000.00
Zatz, Andrew	0.3	$630.00
B04	**154.8**	**$131,812.00**
Case Administration	**154.8**	**$131,812.00**
Beil, Ryan	1.5	$1,920.00
Chitwan, Charu	0.4	$444.00
Greissman, Scott	0.6	$1,500.00
Hirshorn, Deanna	12.4	$6,076.00
Hong, Alice	2.5	$3,425.00
Isaac, Chantal	0.6	$522.00
Koster, Charles	0.5	$950.00
Lingle, Barrett	2.8	$3,836.00
Litz, Dominic	6.1	$8,357.00
Mago, Don	40.4	$39,996.00
Miranda, Loredana	8.3	$10,126.00
Sachdev, Varoon	5.5	$7,810.00
Smith, Erin	4.2	$6,846.00
Venes, Aileen	10.0	$4,900.00
Walz, Jacko	4.0	$3,480.00
Wick, Katie	43.6	$21,364.00
Zahiremami, Golshid	9.6	$9,504.00
Yu, Emily	1.8	$756.00
B05	**268.2**	**$500,054.00**
Case Strategy	**268.2**	**$500,054.00**
Aquije, Alonso	0.8	$888.00
Beil, Ryan	6.7	$8,576.00
Bourgault, Jacob	1.3	$1,131.00
Chase, Ashley	6.7	$10,586.00
Chemborisov, Gleb	0.5	$245.00
Chitwan, Charu	1.3	$1,443.00
Greissman, Scott	17.2	$43,000.00
Hong, Alice	3.1	$4,247.00
Isaac, Chantal	2.0	$1,740.00
Kakani, Bhavini	0.8	$696.00
Koster, Charles	2.6	$4,940.00
Lingle, Barrett	7.6	$10,412.00

Cat. No. Project Category Description Name	Hours	Fees
Litz, Dominic	19.8	$27,126.00
Mago, Don	15.7	$15,543.00
Miranda, Loredana	7.6	$9,272.00
Pesce, Gregory	73.1	$153,510.00
Quintana, Anastasia	5.7	$4,959.00
Sachdev, Varoon	10.5	$14,910.00
Shore, Christopher	32.5	$81,250.00
Walz, Jacko	1.2	$1,044.00
Yoo, Jade	3.7	$5,069.00
Zahiremami, Golshid	1.3	$1,287.00
Zakia, Jason	5.3	$11,660.00
Zatz, Andrew	41.2	$86,520.00
B06	**24.0**	**$42,195.00**
Cash Management & Intercompany Issues	**24.0**	**$42,195.00**
Beil, Ryan	2.8	$3,584.00
Greissman, Scott	4.4	$11,000.00
Lingle, Barrett	1.5	$2,055.00
Litz, Dominic	0.2	$274.00
Mago, Don	5.6	$5,544.00
Shore, Christopher	1.2	$3,000.00
West, Colin	0.8	$1,432.00
Zahiremami, Golshid	0.4	$396.00
Zatz, Andrew	7.1	$14,910.00
B07	**35.2**	**$44,656.00**
Claims Administration & Objections	**35.2**	**$44,656.00**
Graham, Richard	1.1	$1,793.00
Greissman, Scott	0.1	$250.00
Lingle, Barrett	0.7	$959.00
Litz, Dominic	1.0	$1,370.00
Mago, Don	16.1	$15,939.00
Sachdev, Varoon	6.5	$9,230.00
Shore, Christopher	0.7	$1,750.00
Walz, Jacko	4.5	$3,915.00
Zatz, Andrew	4.5	$9,450.00
B08	**207.8**	**$364,318.00**
Committee Meetings & Communications	**207.8**	**$364,318.00**
Beil, Ryan	1.6	$2,048.00
Chase, Ashley	10.8	$17,064.00
Greissman, Scott	26.4	$66,000.00
Hong, Alice	4.1	$5,617.00
Koster, Charles	4.5	$8,550.00
Lingle, Barrett	6.3	$8,631.00
Litz, Dominic	30.2	$41,374.00
Mago, Don	23.6	$23,364.00
Miranda, Loredana	11.5	$14,030.00
Pesce, Gregory	10.0	$21,000.00
Sachdev, Varoon	6.6	$9,372.00
Shore, Christopher	25.4	$63,500.00
Smith, Erin	11.7	$19,071.00
West, Colin	2.3	$4,117.00
Wick, Katie	0.6	$294.00

Cat. No. Project Category Description Name	Hours	Fees
Yoo, Jade	2.3	$3,151.00
Zahiremami, Golshid	5.5	$5,445.00
Zakia, Jason	4.5	$9,900.00
Zatz, Andrew	19.9	$41,790.00
B09	**14.4**	**$26,733.00**
Corporate, Securities & Regulatory Issues	**14.4**	**$26,733.00**
Abouhashish, Salma	3.9	$3,393.00
Ericksen, A.J.	9.7	$21,340.00
Greissman, Scott	0.8	$2,000.00
B10	**11.7**	**$19,821.00**
Creditor Communications	**11.7**	**$19,821.00**
Beil, Ryan	7.2	$9,216.00
Greissman, Scott	3.8	$9,500.00
Litz, Dominic	0.5	$685.00
Zatz, Andrew	0.2	$420.00
B11	**503.1**	**$828,944.00**
DIP Financing & Cash Collateral	**503.1**	**$828,944.00**
Aquije, Alonso	6.7	$7,437.00
Beil, Ryan	42.5	$54,400.00
Chase, Ashley	14.3	$22,594.00
Greissman, Scott	46.8	$117,000.00
Isaac, Chantal	4.3	$3,741.00
Koster, Charles	12.3	$23,370.00
Lingle, Barrett	33.9	$46,443.00
Litz, Dominic	35.7	$48,909.00
Mago, Don	30.7	$30,393.00
Miranda, Loredana	67.7	$82,594.00
Pesce, Gregory	48.5	$101,850.00
Sachdev, Varoon	2.3	$3,266.00
Shore, Christopher	26.1	$65,250.00
Smith, Erin	9.3	$15,159.00
Yoo, Jade	0.3	$411.00
Zahiremami, Golshid	47.3	$46,827.00
Zakia, Jason	30.6	$67,320.00
Zatz, Andrew	43.8	$91,980.00
B12	**3,328.9**	**$4,295,633.00**
Discovery	**3,328.9**	**$4,295,633.00**
Aquije, Alonso	140.2	$155,622.00
Beil, Ryan	0.5	$640.00
Binuya, Sebastian Angelo	0.5	$210.00
Bourgault, Jacob	371.2	$322,944.00
Chase, Ashley	262.7	$415,066.00
Chemborisov, Gleb	68.3	$33,467.00
Chen, Ken	79.5	$38,955.00
Chen, Tony	3.2	$1,568.00
Chitwan, Charu	196.9	$218,559.00
Galvan, Paolo	1.0	$420.00
Greissman, Scott	94.8	$237,000.00
Hong, Alice	171.3	$234,681.00
Isaac, Chantal	165.6	$144,072.00
Kakani, Bhavini	159.4	$138,678.00

Cat. No. Project Category Description Name	Hours	Fees
Kates, Paula	7.4	$10,138.00
Koster, Charles	8.1	$15,390.00
Litz, Dominic	0.7	$959.00
Magnaye, Maclin	1.0	$420.00
Mago, Don	0.1	$99.00
McNary, Mary Jane	1.2	$504.00
Miranda, Loredana	277.3	$338,306.00
Morales, Jon	0.5	$245.00
Pesce, Gregory	9.2	$19,320.00
Quintana, Anastasia	156.9	$136,503.00
Sachdev, Varoon	2.5	$3,550.00
Shore, Christopher	189.4	$473,500.00
Smith, Erin	389.9	$635,537.00
Venes, Aileen	0.8	$392.00
Walz, Jacko	282.6	$245,862.00
West, Colin	14.6	$26,134.00
Wick, Katie	46.2	$22,638.00
Yoo, Jade	47.6	$65,212.00
Zahiremami, Golshid	19.6	$19,404.00
Zakia, Jason	147.5	$324,500.00
Zatz, Andrew	6.0	$12,600.00
Fajar, Jimmy	1.4	$756.00
Pados, Gyorgy	3.3	$1,782.00
B13	**1,971.8**	**$2,759,882.00**
Exclusivity, Plan & Disclosure Statement	**1,971.8**	**$2,759,882.00**
Abouhashish, Salma	12.1	$10,527.00
Aquije, Alonso	3.0	$3,330.00
Beil, Ryan	59.9	$76,672.00
Bourgault, Jacob	131.9	$114,753.00
Chase, Ashley	109.2	$172,536.00
Chitwan, Charu	87.7	$97,347.00
Ericksen, A.J.	5.7	$12,540.00
Feld, Elizabeth	0.5	$895.00
Greissman, Scott	50.5	$126,250.00
Hirshorn, Deanna	36.7	$17,983.00
Hong, Alice	123.8	$169,606.00
Isaac, Chantal	30.7	$26,709.00
Kakani, Bhavini	75.9	$66,033.00
Koster, Charles	25.3	$48,070.00
Lingle, Barrett	95.7	$131,109.00
Litz, Dominic	15.1	$20,687.00
Lupinacci, Frank	16.7	$31,730.00
Mago, Don	32.6	$32,274.00
Miranda, Loredana	172.8	$210,816.00
Pesce, Gregory	31.2	$65,520.00
Quintana, Anastasia	26.3	$22,881.00
Sachdev, Varoon	34.1	$48,422.00
Shore, Christopher	135.8	$339,500.00
Smith, Erin	113.5	$185,005.00
Venes, Aileen	36.6	$17,934.00
Walz, Jacko	69.0	$60,030.00

Cat. No. Project Category Description Name	Hours	Fees
West, Colin	54.9	$98,271.00
Wick, Katie	101.2	$49,588.00
Yoo, Jade	125.2	$171,524.00
Zahiremami, Golshid	7.0	$6,930.00
Zakia, Jason	68.9	$151,580.00
Zatz, Andrew	82.3	$172,830.00
B14	**8.3**	**$8,328.00**
Executory Contracts & Unexpired Leases	**8.3**	**$8,328.00**
Mago, Don	2.7	$2,673.00
Zahiremami, Golshid	5.5	$5,445.00
Zatz, Andrew	0.1	$210.00
B15	**705.0**	**$1,251,067.00**
Hearings & Court Matters	**705.0**	**$1,251,067.00**
Aquije, Alonso	1.4	$1,554.00
Bourgault, Jacob	27.6	$24,012.00
Chase, Ashley	77.0	$121,660.00
Chitwan, Charu	7.6	$8,436.00
Greissman, Scott	68.5	$171,250.00
Hirshorn, Deanna	5.9	$2,891.00
Hong, Alice	9.4	$12,878.00
Koster, Charles	53.9	$102,410.00
Lingle, Barrett	3.2	$4,384.00
Litz, Dominic	0.8	$1,096.00
Mago, Don	1.2	$1,188.00
Miranda, Loredana	40.8	$49,776.00
Sachdev, Varoon	3.8	$5,396.00
Shore, Christopher	92.7	$231,750.00
Smith, Erin	71.9	$117,197.00
Venes, Aileen	0.6	$294.00
Walz, Jacko	48.2	$41,934.00
West, Colin	55.8	$99,882.00
Wick, Katie	20.3	$9,947.00
Yoo, Jade	4.9	$6,713.00
Zahiremami, Golshid	0.1	$99.00
Zakia, Jason	65.8	$144,760.00
Zatz, Andrew	43.6	$91,560.00
B16	**2,027.9**	**$2,807,492.00**
Investigation of Causes of Action	**2,027.9**	**$2,807,492.00**
Ahmed, Heidi	6.0	$5,940.00
Aquije, Alonso	5.0	$5,550.00
Bagdasarian, Amy	5.1	$8,058.00
Beil, Ryan	221.7	$283,776.00
Bourgault, Jacob	52.5	$45,675.00
Chase, Ashley	207.6	$328,008.00
Chitwan, Charu	38.8	$43,068.00
Feld, Elizabeth	6.8	$12,172.00
Greissman, Scott	44.1	$110,250.00
Hirshorn, Deanna	1.1	$539.00
Hong, Alice	133.0	$182,210.00
Isaac, Chantal	15.8	$13,746.00
Kakani, Bhavini	21.2	$18,444.00

Cat. No. Project Category Description Name	Hours	Fees
Koster, Charles	0.4	$760.00
Lingle, Barrett	0.9	$1,233.00
Litz, Dominic	186.6	$255,642.00
Ludovici, Stephen	0.2	$222.00
Mago, Don	109.3	$108,207.00
Miranda, Loredana	178.4	$217,648.00
Pesce, Gregory	27.2	$57,120.00
Quintana, Anastasia	14.6	$12,702.00
Rai, Parm	12.1	$13,431.00
Sachdev, Varoon	153.7	$218,254.00
Shore, Christopher	0.9	$2,250.00
Silnicki, Graham	9.5	$13,965.00
Slattery, Christine	0.5	$350.00
Venes, Aileen	5.7	$2,793.00
Walz, Jacko	53.9	$46,893.00
West, Colin	195.5	$349,945.00
Wick, Katie	0.6	$294.00
Yoo, Jade	21.2	$29,044.00
Zahiremami, Golshid	186.7	$184,833.00
Zakia, Jason	7.4	$16,280.00
Zatz, Andrew	103.9	$218,190.00
B17	**121.0**	**$139,526.00**
Lien Challenge	**121.0**	**$139,526.00**
Bagdasarian, Amy	8.8	$13,904.00
Beil, Ryan	21.3	$27,264.00
Hirshorn, Deanna	1.0	$490.00
Isaac, Chantal	4.2	$3,654.00
Lingle, Barrett	2.0	$2,740.00
Litz, Dominic	0.3	$411.00
Mago, Don	4.6	$4,554.00
Miranda, Loredana	6.4	$7,808.00
Rai, Parm	11.7	$12,987.00
Sachdev, Varoon	12.7	$18,034.00
Silnicki, Graham	10.3	$15,141.00
Slattery, Christine	25.7	$17,990.00
Wick, Katie	1.1	$539.00
Zahiremami, Golshid	8.0	$7,920.00
Zatz, Andrew	2.9	$6,090.00
B18	**186.8**	**$353,426.00**
Mediation	**186.8**	**$353,426.00**
Beil, Ryan	4.1	$5,248.00
Chase, Ashley	2.5	$3,950.00
Greissman, Scott	42.4	$106,000.00
Hong, Alice	1.4	$1,918.00
Koster, Charles	0.4	$760.00
Lingle, Barrett	1.3	$1,781.00
Litz, Dominic	34.0	$46,580.00
Mago, Don	12.4	$12,276.00
Miranda, Loredana	3.0	$3,660.00
Pesce, Gregory	12.6	$26,460.00
Sachdev, Varoon	23.6	$33,512.00

Cat. No. Project Category Description Name	Hours	Fees
Shore, Christopher	21.0	$52,500.00
Smith, Erin	1.3	$2,119.00
Walz, Jacko	0.2	$174.00
West, Colin	2.2	$3,938.00
Zakia, Jason	13.1	$28,820.00
Zatz, Andrew	11.3	$23,730.00
B19	**37.4**	**$66,382.00**
Non-Working Travel	**37.4**	**$66,382.00**
Chase, Ashley	1.8	$2,844.00
Greissman, Scott	6.8	$17,000.00
Miranda, Loredana	9.5	$11,590.00
Shore, Christopher	8.8	$22,000.00
Walz, Jacko	7.4	$6,438.00
Zatz, Andrew	3.1	$6,510.00
B20	**167.8**	**$184,752.00**
Professional Retention & Fees - W&C	**167.8**	**$184,752.00**
Beil, Ryan	8.4	$10,752.00
Greissman, Scott	3.2	$8,000.00
Hirshorn, Deanna	2.0	$980.00
Koster, Charles	1.8	$3,420.00
Lingle, Barrett	0.6	$822.00
Litz, Dominic	13.9	$19,043.00
Ludovici, Stephen	69.3	$76,923.00
Sachdev, Varoon	0.2	$284.00
Venes, Aileen	7.5	$3,675.00
Walz, Jacko	8.4	$7,308.00
Wick, Katie	1.4	$686.00
Yoo, Jade	1.3	$1,781.00
Zahiremami, Golshid	48.2	$47,718.00
Zatz, Andrew	1.6	$3,360.00
B21	**29.0**	**$35,490.00**
Professional Retention & Fees - Other	**29.0**	**$35,490.00**
Greissman, Scott	0.5	$1,250.00
Hirshorn, Deanna	0.6	$294.00
Lingle, Barrett	2.3	$3,151.00
Litz, Dominic	2.9	$3,973.00
Ludovici, Stephen	1.1	$1,221.00
Mago, Don	0.4	$396.00
Miranda, Loredana	4.3	$5,246.00
Venes, Aileen	0.3	$147.00
Walz, Jacko	2.5	$2,175.00
Wick, Katie	3.3	$1,617.00
Zahiremami, Golshid	6.0	$5,940.00
Zatz, Andrew	4.8	$10,080.00
B22	**5.7**	**$9,573.00**
Reports, Schedules & US Trustee Issues	**5.7**	**$9,573.00**
Chase, Ashley	1.1	$1,738.00
Greissman, Scott	0.4	$1,000.00
Koster, Charles	0.4	$760.00
Lingle, Barrett	1.0	$1,370.00
Smith, Erin	2.5	$4,075.00

Cat. No. Project Category Description Name	Hours	Fees
Zatz, Andrew	0.3	$630.00
B23	**2.4**	**$4,960.00**
Tax Issues	**2.4**	**$4,960.00**
Dreier, David	0.8	$1,880.00
Gee, Steven	1.4	$2,660.00
Zatz, Andrew	0.2	$420.00

Exhibit D

Detailed Statement of Additional Expenses[1]

Name	English Narrative	Category	Amount
Greissman, Scott	Copy of JTT #70370 - IN RE: MODIVCARE / CONFIRMATION HEARING DAY FIVE - COURT'S RULING CASE NUMBER/JUDGE: 25-90309-11 / JUDGE ALFREDO R. PEREZ	Deposition Transcripts	$17.00
Greissman, Scott	12/08/2025 - Catering during trial – JASONS DELI - ~18 meals (partial)	Business Meals	$163.50
Greissman, Scott	12/08/2025 - Catering during trial – JASONS DELI - ~18 meals (partial)	Business Meals	$123.14
Greissman, Scott	12/08/2025 - Catering during trial – JASONS DELI - ~18 meals (partial)	Business Meals	$21.62
Greissman, Scott	12/09/2025 – Catering during trial - Common Bond Brasserie & Bakery - ~15 breakfast items	Business Meals	$99.86
Greissman, Scott	12/09/2025 - Catering during trial – JASONS DELI - ~13 meals	Business Meals	$287.15
Greissman, Scott	12/09/2025 - Catering during trial – JASONS DELI - ~4 meals	Business Meals	$71.45
Greissman, Scott	12/10/2025 - Catering during trial – JASONS DELI - ~19 meals (partial)	Business Meals	$318.39
Greissman, Scott	12/10/2025 - Catering during trial – JASONS DELI - ~19 meals (partial)	Business Meals	$95.68
Greissman, Scott	12/10/2025 - Catering during trial – JASONS DELI - ~19 meals (partial)	Business Meals	$18.91
Greissman, Scott	12/11/2025 - Cardholder- NATALIA MONDRAGON - NIKO NIKOS RESTAURANTS - ModivCare□1908759-0002	Business Meals	$304.62
West, Colin	Taxi - Hotel/Airport - Taxi expense incurred while traveling to Houston for a matter. - 12-Dec-2025	Taxi - Business	$67.59
West, Colin	Taxi - Airport/Residence - Taxi expense incurred while traveling to Houston for a matter. - 12-Dec-2025	Taxi - Business	$187.45
West, Colin	Taxi - Residence/Airport - Taxi expense incurred while traveling to Houston for a matter. - 06-Dec-2025	Taxi - Business	$113.52
West, Colin	One Way, Economy airfare/fee on Delta Airlines Inc. from NYC to HOU for Colin West on 12/06/2025 for ModivCare matter	Airfare	$408.48
West, Colin	One Way, Economy airfare/fee on Delta Airlines Inc. from HOU to NYC for Colin West on 12/12/2025 for ModivCare matter	Airfare	$418.48
West, Colin	Taxi - Airport/Hotel - Taxi expense incurred while traveling to Houston for a matter. - 06-Dec-2025	Taxi - Business	$92.30
West, Colin	Hotel stay by Colin West at JW Marriott Houston Downtown in Houston, TX for 7 days, 6 nights for ModivCare Matter	Hotel Expense	$3,008.44
	TOTAL		**$5,817.58**

[1] Due to an internal administrative issue, some of the "Business Meals" entries were split into multiple line items. The English Narrative has had "(partial)" added to reflect this.

Exhibit E

Summary of Expenses

Category	Amount
Airfare	$21,141.73
Business Meals	$3,482.74
Certification of a Document by the County Clerk	$335.80
Computer Services	$106.00
Conference Room Dining	$6,194.30
Courier Service	$556.09
Court Costs	$200.00
Deposition Transcripts	$153,941.10
Document Research	$309.20
E-Discovery Data Hosting / Storage	$1,479.34
E-Discovery Data Processing	$175.00
E-Discovery Production	$130.00
E-Discovery Technical Time	$75.00
E-Discovery User Fees	$4,275.00
Express Mail	$82.21
External Document Production	$31,128.22
Filing Fees	$600.00
Hotel Expense	$47,561.34
Overtime Meals	$1,145.09
Parking	$212.50
Printing	$2,938.25
Taxi - Business	$11,332.77
Taxi - Overtime	$918.27
Train - Out of Town	$485.10
Travel Meals	$2,740.33
UCC Filing Fees	$8,923.75
Grand Total	**$300,469.13**

Exhibit F

Customary and Comparable Compensation Disclosure for White & Case LLP

The blended hourly rate for White & Case timekeepers (including both professionals and paraprofessionals) who have billed time to the Committee during the Final Period was approximately $1,414 per hour (the "Committee Blended Rate").[1]

The non-bankruptcy blended hourly rate for White & Case's timekeepers during the 12-month period from January 1, 2025, to and including December 31, 2025 (the "Comparable Period")[2] was, in the aggregate, approximately $1,272 per hour (the "Non-Bankruptcy Blended Rate").[3]

A detailed comparison of these rates is as follows:

Category of Timekeeper	Committee Blended Rate	Non-Bankruptcy Blended Rate
Partner[4]	$2,221	$1,816
Counsel	$1,630	$1,436
Associate[5]	$1,169	$1,063
Paraprofessional	$500	$462
Aggregate	**$1,414**	**$1,272**

1 White & Case calculated the blended rate for timekeepers who billed to the Debtors by dividing the total dollar amount billed by such timekeepers during the Final Period by the total number of hours billed by such timekeepers during the Final Period. Accordingly, it does not reflect the voluntary reductions made by White & Case.

2 On an annual basis, White & Case reexamines and adjusts for increases in seniority and changes in experience, expertise, and status in January of each year the rates for lawyers and paraprofessionals.

3 White & Case calculated the Non-Bankruptcy Blended Hourly Rate by dividing the total dollar amount billed by all timekeepers in the applicable offices to non-bankruptcy matters during the Comparable Period by the total number of hours billed by all timekeepers in the applicable offices to non-bankruptcy matters during the Comparable Period. For purposes of the foregoing calculation, White & Case included New York and Chicago as the applicable offices.

4 Does not include partner of counsel.

5 Includes law clerks.

Exhibit G

Pesce Certification

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

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

CERTIFICATION OF GREGORY F. PESCE IN SUPPORT OF WHITE & CASE LLP'S FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

I, Gregory F. Pesce, hereby certify as follows:

1. I am a partner of the firm of White & Case LLP ("White & Case"), an international law firm, which maintains offices for the practice of law at, among other locations, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606-4302, and 609 Main Street, Suite 2900, Houston, TX 77002.

2. This certification ("Certification") is made in connection with White & Case's final application, dated February 12, 2026 (the "Application") for compensation and reimbursement of expenses for the period from September 9, 2025 through December 29, 2025.[2]

3. I have reviewed the Application and certify that, to the best of my knowledge, information, and belief, the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and United States Trustee Programs'

[1] A complete list of each of the Debtors in these 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 these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not defined in this Certification shall have the meaning ascribed to them in the Application.

Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. 330 by Attorneys in Larger Chapter 11 Cases (the "UST Guidelines").

4. I certify that White & Case has complied with the provisions of the Compensation Procedures Order with respect to the Prior Fee Statements filed and served by White & Case.

5. In accord with Appendix B of the UST Guidelines, White & Case states as follows:

(a) Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

(i) **Response**: No.

(b) If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher than 10% or more, did you discuss the reasons for the variation with the client?

(i) **Response**: White & Case did not submit a budget.

(c) Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

(i) **Response**: No.

(d) Does the fee application include time or fees related to reviewing or revising time records or preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application? If so, please quantify by hours and fees.

(i) **Response**: Yes. This Application includes time and fees related to reviewing or revising time records or preparing, reviewing or revising invoices in connection with the preparation of White & Case's monthly fee statements relating to the Final Period. White & Case is seeking compensation for approximately 52.7 hours and $60,167 in fees with respect to reviewing and revising time records to prepare such fee applications.

(e) Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

(i) **Response**: Yes. Such time spent by White & Case to ensure that the time entries subject to this Application do not disclose privileged or confidential information is included in the answer to the previous question. This review and any revisions associated therewith are a necessary component of White & Case's fee applications.

(f) If the fee application includes any rate increase since retention:

(i) Did your client review and approve those rate increases in advance?

(A) **Response**: The Application does not include any rate increases since retention.

(ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not to agree to modify rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

(A) **Response**: The Application does not include any rate increases since retention.

Dated: February 12, 2026
Chicago, Illinois

/s/ Gregory F. Pesce
Gregory F. Pesce
Partner, White & Case LLP

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

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

FINAL ORDER ALLOWING COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR WHITE & CASE LLP
(Docket No. ____)

The Court has considered *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including December 29, 2025* filed by White & Case LLP (the "Applicant"). The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses in the amount of $14,193,990.13 for the period set forth in the application.

2. The compensation and reimbursement of expenses allowed in this order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.

3. The Debtors are authorized and directed to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

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

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

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

OBJECTION TO FINAL FEE APPLICATION
FILED BY ALIXPARTNERS, LLP

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ModivCare Topco, LLC ("**ModivCare**") files this Objection to the Final Fee and Expense Request of AlixPartners, LLP, and would respectfully show as follows:

SUMMARY OF FACTS AND RELIEF REQUESTED

1. The reorganization of ModivCare Inc. and its seventy debtor affiliates (collectively, the "**Debtors**") was characterized by an aggressive, expedited timeline that saw the enterprise transition from its voluntary Chapter 11 filing on August 20, 2025, to the confirmation of its Second Amended Joint Chapter 11 Plan of Reorganization on December 15, 2025.

2. The Official Committee of Unsecured Creditors (the "**Committee**") retained AlixPartners, LLP ("AlixPartners") as its financial advisor to provide specialized expertise in valuation, business plan assessment, and litigation support.

3. In its Final Application, AlixPartners seeks total compensation and expense reimbursement of $5,022,757.29 for approximately 111 days of service as financial advisor to

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

the Committee, comprising $4,955,847.00 in professional fees, $41,910.29 in expenses, and $25,000.00 in *post-effective date* fees.

4. The final fee request should be scrutinized through the lens of the twelve factors articulated in *Johnson v. Georgia Highway Express, Inc*. and the prospective "reasonable at the time" standard established by the Fifth Circuit in *In re Woerner*. A comprehensive audit of AlixPartners' 321 pages of time records reveals a pattern of top-heavy staffing, excessive internal conferencing, the billing of clerical tasks at professional rates, and the pursuit of litigation strategies that lacked an objective prospective benefit to the estate.

5. While the Reorganized Debtors do not contest that AlixPartners performed services during the case, they respectfully submit that the fees and expenses sought are unreasonable, excessive, and insufficiently justified under the standards of 11 U.S.C. § 330 and controlling Fifth Circuit authority.

6. Specifically, the time requested in the Fee Application should be significantly reduced because: (a) AlixPartners charged hourly rates far exceeding prevailing market rates for financial advisory services in the Southern District of Texas; (b) AlixPartners engaged in systematic overstaffing and "gang billing" of routine internal coordination calls, inflating billable hours well beyond what was actual and necessary; (c) AlixPartners duplicated the services of White & Case LLP (**"White & Case"**), counsel to the Committee, in violation of the express terms of the Retention Order; and (d) AlixPartners seeks reimbursement of unreasonable expenses.

JURISDICTION AND STANDING

7. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

I. FACTUAL BACKGROUND

8. On August 20, 2025 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

9. On September 5, 2025, the United States Trustee appointed the Committee [ECF No. 124].

10. On November 4, 2025, this Court entered the Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025 [ECF No. 654] (the "Retention Order").

11. On December 15, 2025, the Court entered the *Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [ECF No. 1055] (the "Confirmation Order"). The Plan went effective on December 29, 2025.

12. On February 11, 2026, AlixPartners filed its Final Fee Application [ECF No. 1288], seeking a final allowance of $5,022,757.29 (the **"Fee Application"**).

II. LEGAL STANDARD

13. Under 11 U.S.C. § 330(a)(1), the Court may award to a professional employed under section 1103 "reasonable compensation for actual, necessary services rendered by the . . . professional person . . . and reimbursement for actual, necessary expenses".

14. Section 330(a)(3) requires the Court to consider the following factors in determining reasonable compensation:

a. the time spent on such services;

b. the rates charged for such services;

c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

15. Section 330(a)(4)(A) further provides that the Court "shall not allow compensation for . . . services that were not . . . reasonably likely to benefit the debtor's estate" or were "not necessary to the administration of the case".

16. In *Barron & Newburger, P.C. v. Texas Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015) (en banc), the Fifth Circuit overruled the prior *Pro-Snax* retrospective "actual benefit" standard and adopted a prospective "good gamble" test, holding that services are compensable if they were either "***necessary to the administration***" of the case or "***reasonably likely to benefit***" the estate "at the time at which [they were] rendered". However, the *Woerner* standard is not a shield for inefficiency or overzealousness. In assessing the likelihood of benefit, courts must consider the probability of success at the time of the service and the reasonable costs of pursuing that action. "Whether the services were ultimately successful is ***relevant*** to, but ***not dispositive*** of,

attorney compensation." *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d at 276 (emphasis added).

17. The Reorganized Debtors contend that AlixPartners' pursuit of a doubling of the enterprise value—from the midpoint of $837.5 million to approximately $1.66 billion—lacked objective reasonableness given the contemporaneous market trading data and the Debtors' operational realities, such as the non-renewal of material contracts. Furthermore, these "opinions" were never disclosed to the Committee for review prior to discussing them at trial.

18. The Fifth Circuit has confirmed that the lodestar method — evaluating (1) whether the hours billed were reasonable, (2) whether the hourly rates are consistent with prevailing market rates, and (3) all other relevant equitable factors — remains the proper analytical framework.[1]

19. The determination of the lodestar amount does not conclude the inquiry.[2] The court possesses broad discretion to adjust the fee award based on the *Johnson* factors, which include: (1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the professional; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship; and (12) awards in similar cases.

20. Courts in the Fifth Circuit have repeatedly reduced or disallowed professional fees for overstaffing, duplication of services, excessive rates, and billing for services that are not actual and necessary. See, e.g., *In re Digerati Techs., Inc.*, 537 B.R. 317 (Bankr. S.D. Tex. 2015)

[1] *Assadi v. Osherow (In re Assadi)*, 2025 U.S. App. LEXIS 13678, at *7 (5th Cir. 2025)
[2] *Moench v. Marquette Transp. Co. Gulf-Inland, L.L.C.*, 838 F.3d 586 (5th Cir. 2016)

(applying *Woerner* lodestar; reducing fees for vague entries, lumping, overstaffing, and lack of billing judgment); *In re 900 Corp., 327 B.R. 585* (Bankr. N.D. Tex. 2005) (court reduced fees for overstaffing, duplicative efforts, and excessive billing, emphasized the need for careful billing judgment, particularly when fees are assessed against another party, and reduced fees to protect estate assets from excessive charges.)

21. The Retention Order itself imposes a binding, affirmative obligation: "AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases" (*Retention Order* ¶ 13). AlixPartners' own Retention Application acknowledged this obligation, stating: "AlixPartners will work closely with White & Case to ensure that there will be no duplication of efforts or unnecessary overlap". (*Retention Application* ¶ 15)

III. APPLICATION OBJECTION

22. The Fee Application should be reduced for five principal reasons:

a. excessive hourly rates;

b. systemic overstaffing and internal “gang billing”;

c. duplication of White & Case’s legal services in violation of the Retention Order;

d. services that were neither reasonable nor necessary, and provided no benefit to the estate;

e. vague and lumped time entries and clerical billing; and

f. unreasonable expenses and impermissible post-effective date fees.

A. HOURLY RATES CHARGED BY ALIXPARTNERS UNREASONABLE

23. AlixPartners staffed this 111-day engagement with 34 individual timekeepers and charged the following rates:

TITLE/LEVEL	RATE RANGE	KEY EXAMPLES
Partner/Managing Director	$1,225 – $1,460/hr	MacGreevey ($1,460) McGlynn ($1,415) Brown ($1,415) Magrisi ($1,250)
Director	$715 – $1,150/hr	Panda ($1,150) Amico ($1,150) Nelson ($1,120) Gates ($1,120) Komendowski ($1,080)
Senior Vice President	$565 – $980/hr	Hood ($850) Clark ($910) Prince ($950) Cuomo ($910)
Vice President	$445 – $835/hr	Lovatto ($835) Bonito ($580) Carafi ($445)
Analyst	$535/hr	Olohan ($535)

24. The resulting blended hourly rate ranged from $1,032.83 (October) to $1,111.70 (November), with a composite average of $1,060.91 across all four months. Industry data confirms that AlixPartners already commands the highest blended hourly rate among financial advisors to unsecured creditors' committees, recorded at $1,013/hour in recent comparable cases, and the rates in this case exceed even that benchmark.

25. These rates are unreasonable under § 330(a)(3)(B) and (F) for several reasons.

B. RATES EXCEED COUNSEL'S RATES

26. Multiple AlixPartners partners billed at $1,415–$1,460/hour — rates that rival or exceed senior White & Case restructuring partners ($2,100–$2,500/hr) on a per-unit basis when one

considers that financial advisory work does not require a law license and does not carry the same professional responsibility obligations. The fact that AlixPartners Directors billing at $1,080–$1,150 per hour and SVPs billing at $850–$980 per hour exceed the rates of many experienced attorneys in this District is itself an indication of unreasonableness.

C. EXCESSIVE NUMBER OF HIGH-RATE BILLERS

27. The engagement featured 9 professionals billing at partner rates ($950–$1,460), 8 directors ($715–$1,150), and 11 SVPs ($565–$980), many of them billing substantially full-time during peak months. For example, in October alone, Ashutosh Panda (Director, rate of $1,150) billed 215.0 hours; Susan Clark (SVP, rate of $910) billed 212.3 hours; Ryan Komendowski (Director, rate of $1,080) billed 189.1 hours; and Lucas Lovatto (VP, $835) billed 162.4 hours. This staffing model is inconsistent with a reasonable, efficient engagement.

D. EXCESSIVE HOURS DUE TO SYSTEMIC OVERSTAFFING AND "GANG BILLING"

28. The time records reveal a pervasive, recurring pattern of billing large numbers of AlixPartners professionals for the same internal coordination calls. This practice dramatically inflated hours and is not the "actual, necessary" service contemplated by § 330. Examples include:

a. **October 6, 2025**: A single internal "workstreams, coordination, and next steps" call was attended by 13 AlixPartners professionals each billing 0.5 hours. Total: 7.0 hours at a blended rate exceeding $1,000/hour, generating approximately $7,700 in fees for one internal telephone call.

b. **October 7, 2025:** A similar internal coordination call involved 11 professionals with each billing 0.6 hours. Total: 6.6 hours, approximately $7,300.

c. **October 14, 2025:** Yet another internal coordination call with 11 professionals with each billing 0.5 hours. Total: 5.5 hours, approximately $5,900.

d. **October 21, 2025:** Internal "work plan and strategy" call with 12 professionals with each billing 0.7 hours. Total: 9.1 hours, approximately $10,000.

e. **October 28, 2025:** Internal "ongoing workstreams" call with 13 professionals, each billing 0.7 hours. Total: 9.1 hours, approximately $10,000.

f. **November 4, 2025:** Internal "ongoing workstreams, coordination of priority tasks, and next steps" call with 12 professionals with each billing 0.8 hours. Total: 10.4 hours, approximately $11,400.

g. **November 11, 2025:** Internal "work plan and strategy" call with 10 professionals with each billing 0.7 hours. Total: 7.0 hours, approximately $7,800.

h. **November 18, 2025:** Internal "work plan and strategy" call with 10 professionals, each billing 0.5–0.6 hours. Total: approximately 5.8 hours, approximately $6,400.

i. **December 2, 2025:** Internal "ongoing workstreams, coordination of priority tasks, and next steps" call with 8 professionals with each billing 0.4 hours. Total: 3.2 hours, approximately $3,700.

29. The foregoing is only a sample. These internal coordination calls occurred weekly or more frequently throughout AlixPartners' engagement, and each call routinely included 8–14 professionals. No reasonable basis exists for requiring 14 financial advisors on a single internal

coordination call. At most, 2–3 senior professionals should attend such calls; the remaining team members can be briefed by memorandum or brief follow-up call. The excess hours generated by this practice are conservatively estimated at 300+ hours over the course of the engagement, representing approximately $300,000–$350,000 in excessive fees.

30. The Reorganized Debtors request disallowance of all time charged by professionals in excess of 3 attendees for any internal-only AlixPartners coordination call, or alternatively, a 20% across-the-board reduction to the "Planning, Coordination and Case Management" category (101.3 hours / $116,057.50) and "Meetings/Communication with UCC and Creditors" category (256.6 hours / $306,728.50) to account for the systematic overstaffing.

E. DUPLICATION OF SERVICES

31. Paragraph 13 of the Retention Order expressly requires that "AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases". AlixPartners' own Retention Application represented that "AlixPartners will work closely with White & Case to ensure that there will be no duplication of efforts or unnecessary overlap". The time records demonstrate systematic failure to honor these obligations across multiple categories.

32. AlixPartners billed 85.5 hours for "*RSA, Disclosure Statement & Plan of Reorganization*" work, including reviewing and "providing comments" on draft confirmation objections, plan supplements, and other legal pleadings. For example, Chase Hood (SVP, $850/hr) billed 0.7 hours on November 21 to "Review initial draft of confirmation objection," 1.4 hours on November 25 to "Review and provide additional comments to further revised confirmation objection," and 1.3 hours on November 25 to "Revise and provide comments to revised confirmation objection". Reviewing, revising, and commenting on draft confirmation objections is quintessential legal work product that was White & Case's core function. White & Case billed

522.7 hours ($759,367.00) in its November and December time periods under its own "*Exclusivity, Plan & Disclosure Statement*" category for this same work. While a financial advisor may reasonably review financial aspects of plan documents, the detailed review and revision of legal briefs and confirmation objections by a financial advisor at $850/hour is duplicative.

33. AlixPartners billed 398.4 hours ($469,325.50) for "*Litigation Support / Investigations*," which the Fee Application describes as including "[c]onducted detailed investigations into the Debtors' insiders and other parties' actions prior to filing for bankruptcy" and "[r]eviewed the Debtors' advisors' reports on these actions, prepared related expert reports, and summarized findings for the Committee". White & Case simultaneously billed 382.9 hours ($523,640.00) in December alone, and substantial additional hours in November, under its own "*Investigation of Causes of Action*" category for the same underlying investigation. The combined total for investigation activities between both firms exceeded 780+ hours — an extraordinary figure for investigating pre-petition transactions in a case that ultimately did not result in any filed adversary proceedings.

34. Both firms had multiple professionals attending the same deposition preparation sessions (*e.g.*, the November 7 call where AlixPartners professionals Rubel, Amico, Komendowski, and MacGreevey attended alongside White & Case attorneys Zakia, Smith, and Chase to "prepare for ModivCare CEO deposition").

35. Both firms reviewed the same Silvers investigation report and prepared responsive analysis.

36. AlixPartners billed 201.9 hours ($240,499.50) for "Court Hearings and Status Conferences". While financial advisor attendance at certain hearings may be appropriate, the time

records reveal multiple AlixPartners professionals attending the same hearings at which White & Case was already present and advocating:

a. **September 30, 2025 (DIP Hearing):** Six AlixPartners professionals attended (MacGreevey, McGlynn, Amico, Gates, Hood, Cuomo), collectively billing 30.4 hours ($34,241.50). White & Case — which was conducting the actual litigation — also had its full trial team present.

b. **December 8–11, 2025 (Confirmation Hearing):** AlixPartners billed 153.1 hours ($184,505.50) in December for "Court Hearings and Status Conferences" alone. White & Case simultaneously had over a dozen attorneys at the confirmation hearing, billing 472.2 hours ($837,561.00) in its "Hearings & Court Matters" category. While AlixPartners' expert witness Greg Magrisi needed to attend for his testimony and one or two professionals could reasonably observe, the attendance of multiple additional AlixPartners professionals at every hearing session is unreasonable.

37. AlixPartners billed 152.4 hours ($147,204.50) for "Claims Analysis". White & Case also performed claims analysis work, billing under its "Claims Administration & Objections" categories. For example, White & Case billed 20.7 hours on claims work in November alone, including extensive research into make-whole claims and precedent claim objections. Both firms performed overlapping claims analysis during the same period.

38. Of the 215.0 hours ($228,903.50) AlixPartners billed for "DIP Financing and Cash Collateral," the vast majority (213.7 hours) was incurred in September. While the preparation of the MacGreevey declaration supporting the DIP objection was a legitimate financial advisory function, much of the remaining DIP work overlapped with White & Case's role as lead counsel

on the DIP objection. White & Case billed 57.3 hours ($99,952.00) for DIP Financing work in October alone, and substantial additional hours in September. Both firms had multiple professionals attending the same DIP hearings and breakout meetings on September 30.

F. EXCESSIVE FEE APPLICATION PREPARATION TIME

39. AlixPartners billed 83.0 hours ($60,713.00) for "Fee Statements / Fee Applications" — *i.e.*, preparing its own monthly fee statements and this final fee application. While the Supreme Court confirmed in *Baker Botts LLP v. ASARCO LLC*, 576 U.S. 121 (2015), that preparing fee applications is compensable, § 330(a)(6) requires that such compensation be "reasonable in relation to the level and skill required". Over 83 hours to prepare four monthly fee statements and one final application is unreasonable; the Fee Application itself is largely a compilation of previously filed monthly fee statements with a brief narrative.

G. AMBIGUOUS TIME WHICH LACKS SUFFICIENT DETAIL

40. Under *In re Woerner*, the burden is on the professional to show that any billed for service was a "good gamble" at the time it was made. It is impossible to assess the objective reasonableness of a "workstream" if the professional refuses to describe or identify the work being performed. Numerous entries in the application fail to meet the disclosure standards of this Circuit, including the following:

Matter 1.1.1: Planning, Coordination and Case Management

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/10/25	KBM	Prepare case set-up items	0.9	$1,415	$1,273.50
09/10/25	KBM	Email to internal team re: case workstreams and next steps	0.6	$1,415	$849.00
09/11/25	GM	Prepare for call for ModivCare re: diligence	0.3	$1,250	$375.00
09/24/25	AP	Call... re: weekly case updates and ongoing workstreams	0.6	$1,150	$690.00

09/24/25	CH	Call... re: weekly case updates and ongoing workstreams	0.6	$850	$510.00
09/24/25	CC	Call... re: weekly case updates and ongoing workstreams	0.6	$910	$546.00
09/24/25	DM	Call... re: weekly case updates and ongoing workstreams	0.6	$1,460	$876.00
09/24/25	JA	Call... re: weekly case updates and ongoing workstreams	0.6	$1,150	$690.00
09/24/25	KBM	Call... re: weekly case updates and ongoing workstreams	0.6	$1,415	$849.00
09/24/25	LL	Call... re: weekly case updates and ongoing workstreams	0.6	$835	$501.00
09/24/25	MDG	Call... re: weekly case updates and ongoing workstreams	0.6	$1,120	$672.00
09/24/25	RK	Call... re: weekly case updates and ongoing workstreams	0.6	$1,080	$648.00
09/24/25	SC	Call... re: weekly case updates and ongoing workstreams	0.6	$910	$546.00
09/24/25	TGP	Call... re: weekly case updates and ongoing workstreams	0.6	$950	$570.00
10/06/25	JA	Draft of key items and workplan required to get to Confirmation	1.1	$1,150	$1,265.00
10/06/25	Group	(12 identical entries) Call... re: ongoing workstreams and next steps	6	(Avg)	$6,720.00
10/07/25	Group	(11 identical entries) Call... re: priority tasks and next steps	6.6	(Avg)	$7,785.00
10/14/25	Group	(11 identical entries) Call... re: priority tasks and next steps	5.5	(Avg)	$6,942.50
10/21/25	Group	(12 identical entries) Call... re: strategy and next steps	8.4	(Avg)	$10,741.50
10/28/25	Group	(12 identical entries) Call... re: priority tasks and next steps	8.4	(Avg)	$10,741.50
11/18/25	Group	(8 identical entries) Call... re: strategy and next steps	4.1	(Avg)	$5,042.00
11/18/25	JA	Draft key workstream tracker and identify of update to priority deliverables	0.5	$1,150	$575.00
12/02/25	Group	(8 identical entries) Call... re: priority tasks and next steps	3.2	(Avg)	$3,706.00

Matter 1.1.9: Business and Strategic Plan

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
10/1/2025	AP	Review discovery documents for each segment	2.8	$1,150	$3,220.00

10/2/2025	AP	Review discovery documents for each segment	2.7	$1,150	$3,105.00
10/3/2025	AP	Review discovery documents for each segment	2.4	$1,150	$2,760.00
10/6/2025	AP	Review discovery documents for each segment	2.6	$1,150	$2,990.00
10/7/2025	AP	Review discovery documents for each segment	1.8	$1,150	$2,070.00
10/8/2025	AP	Review discovery documents for each segment	2.9	$1,150	$3,335.00
10/9/2025	AP	Review discovery documents for each segment	1.5	$1,150	$1,725.00
10/10/2025	AP	Review discovery documents for each segment	2.6	$1,150	$2,990.00
10/13/2025	AP	Review discovery documents for each segment	2.8	$1,150	$3,220.00
10/14/2025	AP	Review discovery documents for each segment	1.3	$1,150	$1,495.00
10/15/2025	AP	Review discovery documents for each segment	2.5	$1,150	$2,875.00
10/16/2025	AP	Review discovery documents for each segment	1.3	$1,150	$1,495.00
10/17/2025	AP	Review discovery documents for each segment	1.4	$1,150	$1,610.00
10/20/2025	AP	Review discovery documents for each segment	1.2	$1,150	$1,380.00
10/21/2025	AP	Review discovery documents for each segment	0.7	$1,150	$805.00
11/12/2025	LL	Review open business plan questions (No context)	0.3	$835	$250.50
11/14/2025	AP	Review discovery documents for each segment	1.1	$1,150	$1,265.00
11/17/2025	SC	Prepare for deposition, re: Business Plan diligence (Vague session)	2.4	$910	$2,184.00
11/20/2025	LL	Review documents and materials for deposition preparation	0.7	$835	$584.50

Matter 1.1.11: Financial and Other Diligence

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
9/11/2025	JL	Review case filings to prepare for kick off	0.6	$1,225	$735.00
9/11/2025	JL	Review initial request list	0.6	$1,225	$735.00
9/15/2025	KBM	Review information available in data room	0.3	$1,415	$424.50

9/24/2025	KBM	Review outstanding information requests	0.4	$1,415	$566.00
10/1/2025	JA	Review various data room files and provide summary overview	0.8	$1,150	$920.00
10/3/2025	JA	Review various data room documents re prep for upcoming hearing	2	$1,150	$2,300.00
10/6/2025	MDG	Review open items on diligence list	1	$1,120	$1,120.00
10/7/2025	MDG	Review docket for various debtor filings	0.5	$1,120	$560.00
10/9/2025	KBM	Review outstanding information requests and next steps	0.6	$1,415	$849.00
10/9/2025	MDG	Review contracts in Datasite dataroom	1	$1,120	$1,120.00
10/14/2025	JA	Review historical diligence info re prior forecasts	0.5	$1,150	$575.00
11/3/2025	KBM	Review updates re: outstanding information requests	0.4	$1,415	$566.00
11/4/2025	JA	Review various data room documents re historical financial projections	0.5	$1,150	$575.00
11/6/2025	JA	Review various documents re projections per request from W&C	1	$1,150	$1,150.00
11/11/2025	KBM	Review updates re: outstanding diligence requests	0.2	$1,415	$283.00
11/13/2025	KBM	Review updates re: outstanding diligence requests	0.3	$1,415	$424.50
11/24/2025	JA	Review various claims and causes of action listed re Plan Settlement	0.6	$1,150	$690.00
12/4/2025	JA	Prepare for upcoming UCC Committee meeting (Generic prep)	0.5	$1,150	$575.00

Matter 1.20: Fee Applications & Fee Statements (Ministerial Tasks)

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
10/8/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
10/15/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
10/22/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
10/28/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
11/11/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
11/19/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
11/25/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00

12/3/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
12/9/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
12/18/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
12/23/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00

H. IMPROPER LUMPING OF TASKS

41. The U.S. Trustee Fee Guidelines highlight the requirement that each time entry describes a single, distinct task. AlixPartners' records are replete with "lumped" entries that combine disparate activities—such as internal strategy, document review, and correspondence—into a single block of time. Lumped time entries include:

Matter 1.1.1: Planning, Coordination and Case Management

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/10/25	DM	Develop ModivCare UCC work plan, strategy and related staffing	1.5	$1,460	$2,190.00
09/10/25	RK	Discussion... re: valuation work stream and staffing; Discussion... re: business plan workstream	0.2	$1,080	$216.00
09/10/25	CH	Prepare team internal datasite and email distribution group	0.9	$850	$765.00
09/11/25	CC	Complete input to work plan and diligence request lists	1.4	$910	$1,274.00
09/17/25	JL	Call... re: unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9	$1,225	$1,102.50
09/18/25	Group	(8 profs) Call... re: case updates and work plan	6.4	(Avg)	$6,996.00
09/24/25	Group	(11 profs) Call... re: weekly case updates and ongoing workstreams	6.6	(Avg)	$7,098.00
10/06/25	Group	(13 profs) Call... re: ongoing workstreams, coordination, and next steps	6.5	(Avg)	$7,310.00
10/07/25	Group	(11 profs) Call... re: ongoing workstreams, coordination of priority tasks, and next steps	6.6	(Avg)	$7,785.00

10/14/25	Group	(11 profs) Call... re: ongoing workstreams, coordination of priority tasks, and next steps	5.5	(Avg)	$6,942.50
10/21/25	Group	(12 profs) Call... re: ModivCare work plan and strategy and next steps	8.4	(Avg)	$10,741.50
10/28/25	Group	(12 profs) Call... re: ongoing workstreams, coordination of priority tasks, and next steps	8.4	(Avg)	$10,741.50
12/02/25	Group	(8 profs) Participate in a call... re: ongoing workstreams and next steps	3.2	(Avg)	$3,706.00

Matter 1.1.2: Meetings & Communication with UCC/Creditors

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/16/25	Group	(12 profs) Participate in call... re: DIP objection, critical vendor, and general case updates	9.6	(Avg)	$11,028.00
09/16/25	Group	(7 profs) Participate in call... re: case status and workstreams	2.1	(Avg)	$2,247.00
09/17/25	Group	(6 profs) Call... re: unencumbered assets and DIP, case updates, and next steps	5.4	(Avg)	$6,304.50
09/18/25	Group	(8 profs) Call... re: case updates, deadlines, workstreams, and next steps	8.8	(Avg)	$10,615.00
09/20/25	Group	(3 profs: CH, CC, DM) Call... re: DIP objection, comparables, and case liquidity	2.4	(Avg)	$2,576.00
09/21/25	Group	(4 profs) Participate in a call... re: cash flow and case extension analysis	1.2	(Avg)	$1,311.00
09/22/25	Group	(6 profs) Call... re: analysis of DIP financing and declaration	4.2	(Avg)	$4,821.00
09/22/25	Group	(8 profs) Call... re: case updates and DIP objection	6.4	(Avg)	$7,316.00
10/02/25	Group	(8 profs) Call... re: updates, DIP hearing, disclosure statement, and strategy	6.4	(Avg)	$7,780.00
11/11/25	Group	(7 profs) Attend meeting... re: Committee meeting, work plan and strategy	4.9	(Avg)	$6,111.00
11/25/25	Group	(7 profs) Call... re: case updates, ongoing workstreams, and next steps	3.5	(Avg)	$4,177.50
12/04/25	Group	(11 profs) Attend meeting... re: case updates and strategy	5.5	(Avg)	$6,450.00
12/18/25	Group	(5 profs) Call... re: case updates, ongoing workstreams, and next steps	2.5	(Avg)	$3,062.50

Matter 1.1.9: Business and Strategic Plan

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/22/25	LL	Reviewed/annotated memorandums... formulated initial working hypotheses	1.2	$835	$1,002.00
09/23/25	LL	Review P&L... identified trends, adjustments, and areas requiring clarification	2.4	$835	$2,004.00
10/01/25	JL	Review data documents... and add follow up request items or status inquiry	1.4	$1,225	$1,715.00
10/02/25	LL	Conduct initial assessment...; compared plan margins to peer benchmarks	2.8	$835	$2,338.00
10/02/25	LL	Review consolidated business plan...; aligned analytical priorities with MD	2.8	$835	$2,338.00
10/03/25	LL	Analyze spend data to identify trends, cost drivers, and optimization opportunities	2.4	$835	$2,004.00
10/06/25	LL	Conduct assessment of indirect-spend... identified baseline and savings rates	2.5	$835	$2,087.50
10/07/25	LL	Analyze supplier-rationalization... flagged overlapping vendors and limited leverage	2.8	$835	$2,338.00
10/10/25	LL	Research automation call-deflection; estimated reduction and resulting FTE changes	2.6	$835	$2,171.00
10/13/25	LL	Prepare effectiveness model... estimating potential savings	2.7	$835	$2,254.50
10/13/25	LL	Prepare interview questions... for informal call with Ken Shepard	2.5	$835	$2,087.50
10/29/25	LL	Integrate initiatives into model; ensured consistency of phasing and costs	2.2	$835	$1,837.00
12/08/25	GM	** Testimony preparation with counsel (all day preparation session) **	11	$1,250	$13,750.00
12/09/25	GM	** Testimony preparation with counsel (all day preparation session) **	11	$1,250	$13,750.00

Matter 1.1.11: Financial and Other Diligence

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/11/25	CC	Create and edit diligence list across 13 week, DIP, M&A, and other categories	2.6	$910	$2,366.00
09/12/25	JA	Review background information and update to due diligence list	1.6	$1,150	$1,840.00
09/15/25	CH	Download and review new uploads to data room	1.2	$850	$1,020.00

09/19/25	CC	Review discovery files and organize associated diligence tracker	0.9	$910	$819.00
11/04/25	JA	Analyze various issues re cash collateral, sureties and letters of credit	1.2	$1,150	$1,380.00
11/04/25	JA	Draft and review of various waterfall scenarios based on different valuations	1	$1,150	$1,150.00
11/05/25	JA	Draft questions list for depositions re business plan, Q1'25 and liquidity	1.5	$1,150	$1,725.00
11/07/25	JA	Draft potential questions for depositions as well as flagging supporting documents	1.7	$1,150	$1,955.00
11/12/25	JA	Review and provide comments on UCC standing motion; follow up on requests	1.5	$1,150	$1,725.00
12/01/25	JA	Review deposition transcripts re: draft of follow up items	1.2	$1,150	$1,380.00
12/03/25	JA	Analyze filed monthly operating report re performance and payments of claims	1.1	$1,150	$1,265.00
12/04/25	JA	Analyze voting results and prepare summary based on vendors paid	1.3	$1,150	$1,495.00

Preparation of Presentations, Objections, and Testimony (Misc. Categories)

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/15/25	JA	Draft supporting slides and provide comments on first day motions (Category 1.1.3)	0.9	$1,150	$1,035.00
10/29/25	JA	Draft update materials including recovery scenarios and liquidity update (Category 1.1.3)	2	$1,150	$2,300.00
10/30/25	CH	Prepare demonstratives and commentary for claims analysis (Category 1.1.3)	2.2	$850	$1,870.00
11/05/25	JA	Review W&C motion and assist with providing financial inputs (Category 1.1.12)	1.5	$1,150	$1,725.00
11/23/25	JA	Review/provide comments on confirmation objection and prepare backup (Category 1.1.12)	0.8	$1,150	$920.00
12/01/25	CR	Draft direct testimony scripts and exhibits in preparation for trial (Category 1.1.13)	3.2	$1,225	$3,920.00
12/02/25	CR	Draft direct testimony scripts and related demonstratives (Category 1.1.13)	2.3	$1,225	$2,817.50
12/08/25	DM	Session re: confirmation recap and witness preparation (Category 1.1.13)	1.5	$1,460	$2,190.00

I. CLERICAL AND MINISTERIAL TASKS

42. Professionals are prohibited compensation for "essentially clerical or secretarial work," regardless of whether the person performing the task is a professional. Such tasks are considered overhead, and their cost should be absorbed by the firm's hourly rates. The AlixPartners time records contain numerous entries where highly compensated professionals billed the estate for ministerial work. Below are some examples:

a. **Case Setup and Administration:** On September 10, 2025, Kathryn B. McGlynn (Managing Director, $1,415/hr) billed 0.9 hours to “Prepare case set-up items.” Setting up an internal project file is a basic administrative function that does not require the expertise of a managing director.

b. **Data Room and Distribution List Management:** Chase Hood (SVP, $850/hr) billed 0.8 hours on September 10, 2025, and another 0.8 hours on September 11, 2025, to “Prepare team internal datasite and email distribution group.” Additionally, on September 10, 2025, Hood billed 0.8 hours to “Prepare working group list for counsel.”

c. **Fee Application Preparation:** Lisa Marie Bonito (VP, $580/hr) billed 62.3 hours in Category 1.20 (Fee Applications & Fee Statements).1 While some time for fee application preparation is compensable, over 60 hours for a reorganization that lasted less than four months is excessive. Much of this time was spent on repetitive tasks such as “Analyzing professional fees… for privilege and confidentiality” and “Preparing schedule/exhibit workbook”.

43. The practice of billing the estate at professional rates—up to $1,415 per hour—for managing email distribution lists and formatting data rooms is inherently unreasonable. The Reorganized Debtors submit that these entries should be disallowed in their entirety.

J. UNREASONABLE EXPENSES

44. AlixPartners seeks $41,910.29 in total expenses. The Reorganized Debtors object to the following categories of expenses:

a. **Excessive Research Reports:** In October 2025 alone, AlixPartners purchased three third-party market research reports totaling $9,400.00: "US Home Care Services Market Outlook" ($2,000.00), "US Remote Patient Monitoring Market Outlook" ($4,950.00), and "US Non-Emergency Medical Transportation Market to 2031" ($2,450.00). When combined with $2,253.63 in September research costs (including $1,210.10 and $893.53 for additional industry research reports), AlixPartners charged the estate $11,973.63 for "Client Research". The necessity of nearly $12,000 in off-the-shelf industry research reports has not been demonstrated, particularly where AlixPartners presumably already possesses expertise in the healthcare and transportation sectors that justified its retention.

b. **Luxury Lodging:** In October 2025, the expense records reflect $1,500/person for two nights at New York City hotels (Westin Grand Central and Benjamin Royal Sonesta) for Amico and Komendowski — while traveling to ***AlixPartners' own New York office at 909 Third Avenue***. The Reorganized Debtors question why the estate should bear

lodging costs for AlixPartners professionals traveling to their firm's own headquarters.

c. In November 2025, lodging totaled $3,000.00, and in December 2025, lodging totaled $8,797.53 — the highest single expense category in December.

K. POST-EFFECTIVE DATE FEES

45. AlixPartners requests an additional $25,000.00 for "fees incurred or expected to be incurred *after the Effective Date* . . . in connection with the preparation and prosecution of this final Application". The Retention Order, at Paragraph 5, provides that "AlixPartners shall not seek reimbursement from the Debtors' estates for any fees incurred in defending any of AlixPartners' fee applications in these Chapter 11 Cases". To the extent the $25,000.00 includes any fees for defending this Fee Application against objections, such fees are expressly prohibited. AlixPartners should be required to submit an itemized statement of actual post-effective date fees incurred, limited strictly to preparation (not defense), before any allowance is granted.

PRAYER

WHEREFORE, ModivCare, respectfully prays that the Court deny the requested fees and for such other and further relief as the Court deems just and proper.

Date: March 4, 2026.

Respectfully submitted,

WALKER & PATTERSON, P.C.

By:*/s/ Johnie Patterson*

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CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Objection was served electronically upon all parties entitled to notice pursuant to this Court's CM/ECF electronic noticing platform on March 4, 2026.

By:*/s/ Johnie Patterson*
Johnie Patterson

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

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

ORDER ON OBJECTION TO FINAL FEE APPLICATION FILED BY ALIXPARTNERS, LLP
[Relates To ECF No. _____]

It is

ORDERED that the Fees requested by AlixPartners, LLP are disallowed, and it is further

ORDERED that the Expenses requested by AlixPartners, LLP are disallowed.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

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

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

OBJECTION TO FINAL FEE APPLICATION
FILED BY WHITE & CASE, LLP

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ModivCare Topco, LLC (**"ModivCare"** or **"Reorganized Debtors"**) files this Objection to the Final Fee and Expense Request of White & Case, LLP, and would respectfully show as follows:

I. SUMMARY OF FACTS AND RELIEF REQUESTED

The Reorganized Debtors hereby object to the final fee application filed by White & Case LLP (**"White & Case"**), counsel for the Official Committee of Unsecured Creditors (the **"Committee"**), seeking $13,893,521.00 in fees and $300,469.13 in expenses for 111 days of work. White & Case was retained as a fiduciary. It did not act as one. Soon after its retention, White & Case delivered an ultimatum to the Consenting Creditors: pay $30 million to the unsecured class, or the estate professionals would generate $30 million in fees through litigation. Pay the class or pay the professionals.

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

On October 28, 2025, before the bulk of White & Case's billing occurred, the Consenting Creditors warned this Court that "the Committee's real strategy appears to be to bury the estate in exponentially expanding professional fees in order to extract an outsized settlement where it otherwise has no viable legal strategy. They identified the Committee's valuation theory as "completely unsupportable," requiring a 65% swing above the Debtors' midpoint valuation which was an impossible burden.

White & Case executed that strategy anyway. It deployed 54 timekeepers. It assigned 39 of them to review 30,000 documents. It sent 9 attorneys to the confirmation hearing and 12 to routine weekly calls. It charged a 10-22% "bankruptcy premium" above its own non-bankruptcy rates. It billed for stays at the Ritz-Carlton and Four Seasons. And it never submitted a budget.

ModivCare request the following relief, in the alternative: First, because White & Case announced in advance its intention to bury the estate in professional fees if its demands were not met and then carried out that threat through every billing category in this case, the Court should deny White & Case's Final Fee Application in its entirety under 11 U.S.C. §§ 328(c), 330(a)(4)(A), and 105(a), and award no compensation whatsoever. Second, in the alternative, the Court should drastically reduce White & Case's fees and expenses under 11 U.S.C. § 330 and equitably subordinate the remaining to the claims of unsecured creditors under 11 U.S.C. § 510(c). Third, in the further alternative, Third, the Court should drastically reduce the fees and expenses under §330.

II. JURISDICTION AND STANDING

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Reorganized Debtors have standing to object to the Final Application for Compensation at ECF No. 1290 **("Final Fee Application")** filed by White & Case, LLP (**"White & Case"**) as the party obligated to pay the fees sought. See 11 U.S.C. § 330(a)(1); Compensation Procedures Order [Docket No. 500].

III. RELEVANT BACKGROUND

3. On August 20, 2025 (the **"Petition Date"**), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. On September 5, 2025, the United States Trustee appointed the Committee [Docket No. 124].

5. On September 9, 2025, the Committee selected White & Case as its bankruptcy counsel.

6. On October 8, 2025, the Committee filed its *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* [Docket No. 472] (the "**Retention Application**").

7. In the Retention Application and the proposed Retention Order, the Committee represented to this Court that the retention of White & Case was necessary and in the best interest of the Debtors, their estates, their creditors, and all parties in interest.

8. On October 28, 2025, the Consenting Creditors filed a Statement [Docket No. 589] regarding White & Case's Retention Application, serving as an early warning to the Court and White & Case regarding its aggressive and abusive billing strategy (the **"Statement"**).

9. The Statement explicitly cautioned that the Committee's real strategy appears to be to bury the estate in exponentially expanding professional fees in order to extract an outsized settlement where it otherwise has no viable legal strategy.

10. The concerns raised in the Statement show that the Reorganized Debtors accurately quantified this harm in real-time, projecting that White & Case's aggressive litigation strategy would needlessly inflate total estate professional fees putting unsecured creditors further out of the money than they already were.

11. On October 31, 2025, the Court entered an order (the **"Retention Order"**) approving the Retention Application and authorizing the retention of White & Case as bankruptcy counsel to the Committee effective as of September 9, 2025.

12. The Retention Order specifically provides that White & Case shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

13. On December 15, 2025, the Court entered the *Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055] (the **"Confirmation Order"**). The Plan went effective on December 29, 2025.

14. On February 12, 2026, White & Case filed its Final Fee Application [Docket No. 1290], seeking a final allowance of $13,893,521.00 in attorney's fees and an additional $300,469.13 in expenses (the **"Fee Application"**).

IV. WHITE & CASE'S COERCIVE THREAT AND INEQUITABLE CONDUCT

15. Representatives of the Committee's professional team, including Scott Greissman, a partner at White & Case, met in person with the Debtors and the Consenting Creditors and delivered an unequivocal demand. During this meeting, Mr. Greissman insisted that $30 million

be paid to unsecured creditors and made clear that, absent such payment, the estate would incur comparable or greater sums in professional fees through sustained litigation.

16. The message was direct and unmistakable: either allocate $30 million to the class or prepare to spend it on professional fees. White & Case's threat was unambiguous: pay the class or pay us. This was not a good faith negotiation tactic. It was an extortionate proposition. The Committee's professionals were threatening to inflict massive administrative expenses upon the estate unless the Consenting Creditors capitulated to a $30 million settlement demand that the Committee's own legal theories could not independently support.

17. The threat did not occur on a single occasion. Mr. Greissman had further phone conversations with counsel for the Consenting Creditors in which he reiterated the same demand.

18. As the Consenting Creditors detailed in their Statement filed at Docket No. 589, "The Committee's real strategy appears to be to bury the estate in exponentially expanding professional fees in order to extract an outsized settlement where it otherwise has no viable legal strategy." The Consenting Creditors further noted that professional fees in these cases were projected to increase from the original DIP Budget estimate of $51 million by an additional $46 million, to a total of $91 million through the year end exit, "principally as a result of the Committee's litigation efforts."

19. The accuracy of this characterization was borne out by subsequent events. The Committee pursued discovery on the DIP financing where there was no competing alternative, litigated the UnitedHealthcare settlement motion which rested in the sound business judgment of the Debtors, and launched "extremely broad" discovery in connection with plan confirmation, all in furtherance of a completely unsupportable valuation theory. As the Consenting Creditors warned in their October 28 Statement, filed well before the bulk of the confirmation related billing occurred, the Committee's valuation theory required proving an enterprise value at least 65% higher than the

Debtors' midpoint valuation. Despite this warning, White & Case continued to generate millions in fees pursuing it. The Committee ultimately failed to prevail on its confirmation objection, and the Court confirmed the Plan on December 15, 2025.

20. The Committee's professionals, White & Case and AlixPartners combined, generated nearly $20 million in fees and expenses in less than four months, while the unsecured creditors they were ostensibly protecting received a fraction of the $30 million initially demanded.

21. The fees were not a byproduct of vigorous but reasonable advocacy. They were the direct fulfillment of the threat made at the outset: if the $30 million was not paid to the class, the professionals would ensure that the money was extracted from the estate in fees.

22. The fact that Mr. Greissman, the specific partner who made these threats, personally billed $1,027,000 over 111 days is itself powerful evidence that the threat was carried out. His billing pattern confirms it. He inserted himself into nearly every workstream in the case as a $2,500 per hour "monitor" and "reviewer," adding a supervisory billing layer on top of work already being performed by other partners who were themselves billing at $2,100 to $2,500 per hour. His $190,000 in monitoring entries alone, passively observing depositions conducted by other partners and watching hearings argued by other partners, represents precisely the kind of duplicative, non-beneficial fee generation that Section 330 was designed to prevent.

V. LEGAL STANDARD FOR ALLOWANCE OF PROFESSIONAL FEES

23. Under 11 U.S.C. § 330(a)(1), the Court may award to a professional employed under section 1103 "reasonable compensation for actual, necessary services rendered by the . . . professional person . . . and reimbursement for actual, necessary expenses".

24. Section 330(a)(3) requires the Court to consider the following factors in determining reasonable compensation:

a. the time spent on such services;

b. the rates charged for such services;

c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and

e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

25. Section 330(a)(4)(A) further provides that the Court "shall not allow compensation for . . . services that were not . . . reasonably likely to benefit the debtor's estate" or were "not necessary to the administration of the case".

26. Pursuant to Section 330(a)(4)(A), the fees related to White & Case's pursuit of hyper-aggressive discovery and litigation on issues where they had no viable legal strategy, including but not limited to the DIP financing, the UnitedHealthcare settlement, and plan confirmation, are not compensable.

27. In *Barron & Newburger, P.C. v. Texas Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015) (en banc), the Fifth Circuit overruled the prior *Pro-Snax* retrospective "actual benefit" standard and adopted a prospective "good gamble" test, holding that services are compensable if they were either "***necessary to the administration***" of the case or "***reasonably likely to benefit***" the estate "at the time at which [they were] rendered". The Fifth Circuit confirmed that the lodestar method — evaluating (1) whether the hours billed were reasonable, (2) whether the hourly rates are consistent with prevailing market rates, and (3) all other relevant equitable factors — remains the proper analytical framework.

28. Courts in the Fifth Circuit and this District have repeatedly reduced or disallowed professional fees for overstaffing, duplication of services, excessive rates, and billing for services that are not actual and necessary. See, e.g., *In re Digerati Techs*. (Bankr. S.D. Tex. 2015) (applying Woerner lodestar; reducing fees for vague entries, lumping, overstaffing, and lack of billing judgment).

29. In addition, 11 U.S.C. § 105(a) provides that the Court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title. This includes the authority to reduce or deny fees where the professional has engaged in conduct inconsistent with its fiduciary obligations or where the billing practices are so pervasive and systematic that entry by entry analysis is impractical and a percentage or categorical reduction is warranted.

VI. SYSTEMIC BILLING PRACTICES

A. UNREASONABLE RATE PREMIUM

30. White & Case asserts in its Fee Application that its requested compensation is "reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title".

31. However, White & Case's own data directly contradicts this claim and reveals that White & Case is seeking a significant "bankruptcy premium" from this estate.

a. Partner Rates: The "Committee Blended Rate" for partners in this case is $2,221 per hour.

b. Non-Bankruptcy Rates: The firm's "Non-Bankruptcy Blended Rate" for partners in the same offices during the same period is $1,816 per hour.

c. The Disparity: White & Case is charging this estate $405.00 more per hour, per partner than it charges its non-bankruptcy clients for similarly complex work.

32. Furthermore, this "bankruptcy premium" is not isolated to senior partners at White & Case; it permeates the entire staffing structure of the engagement. For example: associates bill at a blended rate of $1,169.00 per hour compared to non-bankruptcy rate of $1,063.00. In summary, White & Case has a $194.00/hr premium for counsel, $106.00/hr premium for associates, and paraprofessionals are billed at $500.00 per hour exceeding the non-bankruptcy rate of $462.00.

33. White & Case has failed to justify why the Debtors' estate should be forced to pay a 10% to 22% surcharge above the firm's standard commercial rates. This inflation of rates, combined with the "siege strategy", further proves that the $14 million fee request is designed to fulfill White & Case's initial $30 million threat rather than provide reasonable and necessary services to the estate.

B. INADEQUATE VOLUNTARY REDUCTIONS

34. In its Fee Application, White & Case attempts to demonstrate "billing judgment" by explaining that it *"voluntarily elected to reduce its fees by 377.8 hours totaling $487,911.00".*

35. While it appears that White & Case presents this as a significant concession, a mathematical analysis reveals it is a small gesture that fails to address the systemic overbilling identified in this Objection.

36. White & Case is requesting a final allowance of $13,893,521.00 in fees. Against this total, the "voluntary" reduction of $487,911.00 represents a mere 3.5% of the total fees generated. A 3.5% "haircut" is a woefully inadequate remedy for a billing record where partners routinely billed $2,500 per hour to "monitor" depositions or attend meetings with no active role.

37. Furthermore, in the Fee Application, White & Case's (a) average hourly rate for attorneys is $1,466.00; and (b) the total attorney hours covered is 9,298.0. Therefore, a reduction of only 377.80 hours, across 54 timekeepers over 111 days, amounts to a reduction of less than **4 minutes per timekeeper per day.**

38. This is not billing judgment; it is a rounding error.

39. Finally, the reductions mask the “bankruptcy premium”. As noted previously, White & Case's "Committee Blended Rate" of $1,414 is significantly higher than its "Non-Bankruptcy Blended Rate" of $1,272. White & Case explicitly states that its blended rate calculation "does not reflect the voluntary reductions made by White & Case. Even if the $487,911.00 reduction were applied to the partner rates, the partners would still be billing at a rate far exceeding the $1,816 non-bankruptcy average.

40. The "voluntary reduction" appears to be an attempt to create the illusion of restraint while the firm simultaneously extracts a 22% premium over its standard commercial rates for partner time.

C. BLOCK BILLING AND VAGUE TIME ENTRIES

41. Throughout the Fee Application, White & Case often fails to keep detailed time records and instead lumps time together. This type of “block billing" prevents the Court and parties in

interest from assessing the reasonableness of the time spent on any individual task. As a result of lumping fees, White & Case can bury tens of thousands of dollars in single-day entries that were either vague or unusually large.

42. In several instances, associates billed 10 to 13 hours in a single day with virtually no description of the specific work performed or documents reviewed.

43. Several timekeepers billed unusually long hours in a single 24-hour period, which was likely made possible by lumping together endless lists of sub-tasks. For example, on December 7, 2025, one attorney billed 18.60 in a dingle day packing 12 distinct tasks into a massive block entry that included drafting cross outlines, reviewing exhibits, reviewing liquidation research, drafting memos, and holding multiple calls for a total cost of $22,692.00.

ADMITTED CATEGORY OVERLAP

44. White & Case admits in its Fee Application that there was “extensive overlap between project categories B16 and B17. White & Case also admits in Footnote 25 that its project categories are “interconnected” and “overlap”. This is a tacit admission of "lumping" and "block billing."

45. This lack of clear boundaries makes it impossible for the Court to determine if the $2.8 million billed for Investigation (B16) is duplicative of the $4.2 million billed for Discovery (B12).

46. Furthermore, White & Case also admits in the Fee Application that “extensive overlap” exists between the category called, “Investigation of Causes of Action” and B17(Lien Challenge), suggesting the investigation lacked even a clear scope definition.

47. This overlap is a mechanism to hide “gang billing” and prevents the Court from performing the highly detail-driven review required to protect the estate.

D. OVERSTAFFED AND DUPLICATIVE EFFORTS

48. White & Case staffed this 111-day engagement with 54 unique timekeepers, including thirteen partners, and billed the estate over $14 million in less than four months. The sheer volume of attorneys deployed on virtually every task in this case is not a reflection of complexity. The overstaffing was not episodic or limited to a few isolated incidents. It was systematic, pervasive, and applied with equal force to the most consequential matters in the case and the most routine.

49. At hearings, White & Case routinely dispatched armies of attorneys to sit in the courtroom. On the first day of the DIP hearing, nine attorneys attended, including five partners billing between $1,900 and $2,500 per hour. At the confirmation hearing, as many as fourteen attorneys billed on a single day, with the estate paying over $200,000 per day for hearing attendance alone. At the UHC settlement hearing, a three-hour proceeding on an objection, eight attorneys attended.

50. The same pattern infected depositions. At nearly every deposition, the firm sent between four and seven attorneys while a $2,500 per hour partner billed thousands of dollars to passively "monitor" a deposition being conducted by another partner.

51. Drafting was no different. When White & Case drafted the Committee's Standing Motion and Complaint, twelve attorneys billed the estate over a two-day period, generating $223,004.00 in fees for a single pleading. When the firm drafted the UHC settlement objection, twelve attorneys touched the document over the course of a week. When the firm prepared its own ten-page retention application, ten timekeepers were involved, and a single associate spent 48.2 hours on what should have been a half day project at most.

52. The pattern was always the same: a junior attorney would draft, a senior associate would revise, a partner would review, a second partner would review the first partner's review, and then additional attorneys would "confer" about the result.

53. Committee meetings followed the identical model. Across eighteen formal Committee calls during the case, White & Case routinely billed for ten to twelve attorneys on a single call, including as many as six partners. In total, the estate paid $364,318 for White & Case attorneys to communicate with their own client, an amount that reflects not the complexity of the Committee's work but the number of timekeepers White & Case chose to put on the phone.

54. Even routine administrative tasks were overstaffed. Five different associates billing between $990 and $1,420 per hour updated the same internal work in progress tracker nearly every day, generating over $46,000 in fees for what amounts to maintaining an internal to do list. Eight pro hac vice motions, each requiring nothing more than a court form and a certificate of good standing, were routed through seven timekeepers at a cost of $11,365. Four attorneys, including three partners, billed $8,161 to review stay relief motions that the Committee never even contested.

55. The cumulative effect of this staffing model is staggering. When nine attorneys attend a hearing that requires two, the estate pays for seven attorneys who contributed nothing. When seven attorneys attend a deposition that requires two, five of them are billing for the privilege of observation. When twelve attorneys revise a single pleading, at least eight of them are performing duplicative work. Across every category of work in this case, White & Case applied the same formula: flood the matter with timekeepers, layer partner review upon partner review, and bill the estate for the full cost. The Retention Order required White & Case to "use its reasonable efforts to avoid any duplication of services." The billing records demonstrate that White & Case did the opposite.

VII. OBJECTIONS TO BILLING CATEGORIES

56. The Reorganized Debtors objects to each and every time entry and expense contained in the Fee Application on the grounds that White & Case's fees are the product of a coercive threat, and hereby preserve all objections under 11 U.S.C. §§ 328(c), 330(a)(3), 330(a)(4)(A), and 105(a).

57. The specific categories, entries, and examples identified below are illustrative and are not intended to constitute a complete catalog of every objectionable entry.

DIP FINANCING

58. The Committee's objection to the DIP Financing, a facility for which there was no competing alternative, served as White & Case's first major opportunity to execute its coercive billing threat.

59. White & Case assigned 18 attorneys to oppose the DIP Financing proposed by the Debtor, including 5 partners.

60. Project Code B11, which relates solely to reviewing DIP orders, negotiating with the Debtors, drafting the objection to the DIP Motion, and preparing for the contested DIP hearing, totals $828,944.00.In addition, White & Case billed for the following DIP related entries:

Project Code	Description	Dollar Amount
B12	Discovery	$218,452.00
B15	Hearing	$184,363.00
B05	Case Strategy	$28,118.00
B08	Committee Meetings	$4,709.00
B19	Travel Time	$8,556.00
B13	Hearing Exhibits	$7,548.00
	TOTAL	**$451,746.00**

61. In total, White & Case billed the estate $1,280, 690 to address DIP related issues.

OBJECTION TO CONFIRMATION

62. By the time the Committee launched its sprawling confirmation fight their legal and valuation theories were statistically and legally unsupportable. White & Case pursued the confirmation objection anyway, not because it was a "good gamble," but because a multi-day confirmation trial was the ultimate vehicle to generate millions of dollars in fees and force a settlement through attrition.

63. On October 28, 2025, in its Statement filed with the Court, the Consenting Creditors explicitly stated and identified the futility of the Committee's confirmation strategy. The Statement alerted the Court that the Committee's attempt to derail the plan was founded on a completely unsupportable valuation theory.

64. To drive a single dollar of recovery to the subordinated unsecured notes, the Committee needed to prove an enterprise value that was at least 65% higher ($545.5 million higher) than the Debtors' midpoint valuation. The Committee's ability to win this fight was impossible and that the litigation was nothing more than a "siege strategy" designed to press operationally struggling Debtors and very invested secured creditors into surrender by piling expenses onto the estate.

65. The futility of the Committee's strategy was compounded by the fact that it required simultaneously prevailing on three independent and untenable legal theories.

66. The Committee needed to prove: (a) the Debtors' midpoint valuation of $837.5 million was wrong and the Committee's doubled valuation of $1.66 billion was correct; (b) an unprecedented interpretation of Section 552 of the Bankruptcy Code that would, in the result in a paradigm shift for chapter 11 and the global secured lending markets; and (c) a complete unwinding of the Uptier Transaction including erasure of a validly executed subordination agreement.

67. If any one of these theories failed, the entire strategy collapsed. White & Case knew this when it deployed 54 timekeepers to pursue all three simultaneously.

68. Contemporaneous market data further confirmed the objective unreasonableness of the Committee's valuation theory. As of October 2025, while White & Case was generating millions in confirmation-related billing, the Debtors' First Lien Loans traded at approximately 43.7 cents on the dollar, the Second Lien Notes at 1.4 cents, and the Subordinated Unsecured Notes at less than 1 cent. At no time in 2025 had the market agreed with the Committee's valuation because none of the Debtors' secured debt instruments have traded at or near par value.

69. The market is a prospective indicator that was available to White & Case in real time and it knew that the Committee's theory was objectively unreasonable at the time the work was performed. Under Woerner, this is precisely the kind of contemporaneous evidence that demonstrates a strategy was not a "good gamble."

70. The Committee's own valuation rebuttal expert could not remember another time in his extensive experience where a Committee had presented its own view on a Debtors' enterprise value. Furthermore, the already-impossible 65% valuation hurdle was widening, not narrowing, while White & Case continued billing the estate millions of dollars per month. After the Debtors' Valuation was filed with this Court, the Debtors received additional contract terminations and notices of non-renewal from significant customers, representing a materially significant loss of revenue that impacted the valuation of the Debtors' businesses and that was not reflected in the valuation's projected revenues.

71. Every lost contract made the Committee's valuation theory less tenable. A reasonable fiduciary would have reassessed its strategy in light of these developments. White & Case instead continued to bill millions pursuing the same theory.

72. Despite this stark reality, White & Case ignored everything and unleashed a catastrophic wave of billing objecting to confirmation.

No. of Timekeepers	Task	Amount Billed
20	Draft objection to confirmation.	$522,766.00
21	Prepare for confirmation hearing	$752,505.00
14	Witness and Exhibit List	$311,785.00
10	Designate depositions	$156,561.00
11	Organizing exhibits and outlines	$937,316.00
17	Attend Confirmation Hearing	$821,666.00
8	Discovery/Depositions	$2,108,239.00
6	Travel (6 did not bill)	$57,826.00
9	Strategy for Trial	$345,379.00
	TOTAL CONFIRMATION:	**$6,014,043.00**

73. Aside from the fact that the objection to confirmation was unreasonable and not reasonably likely to benefit the estate at the time it was pursued, the other issue is the unreasonableness of the overstaffing related to confirmation. For example, 11 attorneys spent 115 hours in a single day organizing exhibits.

74. Spending over $2 million to conduct depositions can only occur when they are staffed by 7 attorneys including partners who bill at $2,500.00 an hour simply to "monitor" their partner conducting the deposition .

75. This is consistent with the fee-generation strategy: the depositions were not targeted at obtaining specific evidence to support viable claims. They were designed to generate billable hours across as many timekeepers as possible.

76. A good-faith fiduciary does not spend more than $6 million litigating an objection that requires proving an impossible 65% valuation swing. White & Case pursued the confirmation objection knowing it was futile because it provided the ultimate justification to flood the case with timekeepers and execute the $30 million threat.

UHC SETTLEMENT OBJECTION

77. White & Case's pursuit of litigating the UnitedHealthcare (UHC) Settlement is a prime example of the White & Case's scorched earth billing strategy. Without any legitimate hopes of success in opposing the UHC Settlement, White & Case billed as follows:

No. of Attorneys	Description	Amount
13	Drafting Objection, review, outlines	$61,000.00
8	Hearing	$46,000.00
10	Depo and Discovery	$58,605.00
4	Strategy Calls	$33,660.00
	TOTAL	**$199,265.00**

78. In total, 19 attorneys billed the estate regarding the UHC objection. The Committee *lost* the UHC objection at the October 30 hearing. However, White & Case spent an additional $426,328 on UHC-related work *after* the UHC objection had already failed.

COMMITTEE MEETINGS

79. White & Case billed the estate $364,318.00 to attend committee meetings. White & Case's overstaffing infected even the most routine administrative tasks, including weekly Committee update calls.

80. Across the 111-day timeline of these cases, there were at least 18 formal Committee meetings or update calls. The time records reveal a staggering pattern: rather than sending one or

two attorneys to provide updates to the Committee, White & Case routinely had 12 attorneys at a time, including up to five or six partners on a single call.

VAGUE CASE STRATEGY ENTRIES

81. White & Case billed $168,708 across 124 separate time entries in its Case Strategy category (B05) that identify no legal issue, no substantive topic, and no work product — only the names of the individuals on the call. These entries, submitted by 18 different attorneys, consist entirely of descriptions such as "Strategy call with", "Internal strategy call," "Attend W&C team strategy call," and "Weekly strategy meeting with Alix Partners."

82. Section 330(a)(3)(A) requires that fees be for "actual" and "necessary" services. The applicant bears the burden of demonstrating both. A time entry that discloses nothing more than the identity of the participants on a phone call does not permit the Court to evaluate whether the service was necessary to the administration of the case, whether it was duplicative of work performed by others, or whether the time expended was reasonable. The Court cannot determine from "strategy call with S. Greissman" whether the call concerned a matter that benefited the estate or was even related to a pending issue in the case.

83. The $168,708 represents only the portion of the Case Strategy category where no topic could be identified at all; additional Case Strategy entries that could be linked to specific workstreams — such as the DIP Financing objection, the UHC settlement objection, and the confirmation fight — are addressed in those respective sections of this objection.

PRO HAC VICE APPLICATIONS

84. White & Case billed the estate $11,365 across eight routine pro hac vice motions — one for each out-of-state attorney seeking admission to practice before this Court. A pro hac vice motion is among the most routine filings in any bankruptcy case: the attorney fills in a standard

court form with their name, bar number, and jurisdiction of admission, attaches a certificate of good standing, and files it on the docket. A competent legal assistant should be able to prepare and file each motion in ten to fifteen minutes. Eight motions, at fifteen minutes each, is two hours of work. White & Case billed 16.6 hours — more than eight times the reasonable amount — because it routed these simple forms through seven different timekeepers across multiple billing categories.

85. A $990-per-hour associate spent 0.7 hours "reviewing" the motions. A $1,370-per-hour associate "conferred" about them. A $1,110-per-hour associate "finalized and filed" one. A legal assistant spent 1.3 hours on the phone with the PACER Service Center activating a single attorney's CM/ECF account. Each motion passed through multiple hands, each of whom billed a fraction of an hour, transforming a two-hour administrative task into a $11,365 billing event.

LUXURY EXPENSES

86. The Reorganized Debtors object to the entirety of the expenses under 11 U.S.C. §105 based on the coercive threats made by White & Case.

87. In addition, Section 330(a)(1)(B) of the Bankruptcy Code limits reimbursement strictly to "actual, necessary expenses". White & Case professionals consistently opted for premium luxury accommodations and high-end services, far exceeding the reasonable standards for a bankruptcy estate. For example, partners billed the estate for numerous multi-night hotel visits at luxury hotels like the Four Seasons in Houston and the Ritz Carlton in Boston. One attorney billed the estate over $3,000.81 for three nights at a hotel in Miami.

88. Not only did White & Case bill the estate for luxury hotels, but it also billed the estate for extravagant dinners. For example, on December 11, 2025, one attorney billed $1,877.51 for a single dinner.

RETENTION APPLICATION

89. White & Case billed the estate $87,678 across 82 hours and ten separate timekeepers to prepare and file its own retention application which is a ten-page motion that consists almost entirely of boilerplate statutory disclosures required by §§327 and 328 and Bankruptcy Rule 2014.

90. A single associate, billing at $990 per hour, spent 48.2 hours and billed the estate $47,718 to draft and revise this routine filing.

91. The balance was consumed by nine additional timekeepers who reviewed, revised, conferred about, and filed what one associated had previously drafted, including two partners billing at $2,100 and $2,500 per hour and one counsel billing at $1,900 per hour.

92. Mr. Greissman, the partner who threatened to use the fee process as a vehicle to extract his demands, reviewed this ten-page retention application on four consecutive days between October 6 and October 9, billing the estate $6,500 at $2,500 per hour to read and re-read a boilerplate motion that his own associate had already drafted and that another partner had already revised.

93. In total, the three most senior timekeepers on the retention application, collectively billed $14,780, nearly all of which consisted of "reviewing" a document prepared by junior attorneys below them.

94. A retention application of this nature should require no more than two hours at most by a single associate and a reviewing partner. The $87,678 billed here reflects the same pattern of manufactured layering and duplicative review that pervades this fee application.

ASSET ANALYSIS, SALE AND DISPOSITION

95. White & Case billed $2,660.00 under the Asset Analysis, Sale and Disposition category (B02) for a single entry by Partner F. Lupinacci on December 23, 2025 for "Review of new filing re: sale." Mr. Lupinacci bills the estate at $1,900 per hour. Earlier that same month, on December 6, Mr. Lupinacci billed an additional 1.2 hours ($2,280) under the Plan and Disclosure Statement

category (B13) to review "Plan Supplement for any red flag issues." The Plan Supplement contains the very exhibits and transaction documents that would be filed in connection with any sale under the Plan, making these entries functionally duplicative work billed to two separate categories.

96. More revealing is the broader pattern surrounding the Plan Supplement itself. The Plan Supplement is a finite set of exhibit attachments to the Plan of Reorganization. White & Case billed nine separate timekeepers at rates ranging from $870 to $2,500 per hour to review this same stack of documents and then categorized the work across four different billing categories: B02 (Asset Analysis), B09 (Corporate and Securities), B13 (Plan and Disclosure Statement), and B16 (Investigation). On November 17 alone, four attorneys billed the estate to review the initial Plan Supplement, including Mr. Greissman at $2,500 per hour for "attention to Plan supplement" and Mr. Zatz at $2,100 per hour for "reviewing Plan Supplement."

97. By the time the final Plan Supplement was filed in late December, the estate had paid nine different attorneys in excess of $22,000 to read and reread the same set of documents. This is precisely the kind of category overlap and duplicative review that White & Case itself acknowledges in its Fee Application, where it admits that "certain of these categories may overlap with one another." The Plan Supplement is a microcosm of the $14 million problem: a single discrete task, fragmented across multiple billing codes and staffed with enough timekeepers to obscure the true cost of the duplication.

AUTOMATIC STAY ISSUES

98. White & Case billed the estate $8,161.00 under the Automatic Stay Issues category (B03) to review motions for relief from the automatic stay. The Committee took no position on these motions and filed no response.

99. Despite having no active role, White & Case assigned four separate attorneys to review and confer about the same filings, including three partners. Associate D. Litz initially reviewed

and summarized the stay relief motion on October 10 and conferred with Partner A. Zatz, who separately billed 0.3 hours to review the same motion on October 15. By October 23, the matter had expanded to include Partner J. Shore, who billed 0.4 hours ($1,000) for a "call re: lift stay," Partner R. Gorsich, who billed 2.5 hours ($4,750) to review and analyze the motion and confer with multiple attorneys about it, and Litz again for an additional call about the same motion. Gorsich's 2.5 hours represent 58% of the entire category, and this is his only billing entry in the entire case.

100. In total, four attorneys billed the estate $8,161 across 4.5 hours to passively monitor stay relief motions that the Committee never contested. This is a minor category in dollar terms, but it is a powerful illustration of the billing culture that pervaded this engagement. Even on a routine monitoring task requiring no Committee action, White & Case managed to involve four timekeepers, including three partners charging between $1,900 and $2,500 per hour.

FEE APPLICATIONS

101. White & Case billed the estate approximately $98,000 across 87.7 hours and twelve separate attorneys to review its own time entries, draft its own fee statements, and prepare and file its own interim and final fee applications. This is the cost the estate was asked to bear so that White & Case could bill the estate for the privilege of asking to be paid.

102. One attorney billing at $1,110 per hour, who billed approximately 45 hours across 38 entries spanning October through December. The overwhelming majority of his time consisted of a single recurring task: "Review pro forma time entries or expense entries for [month] monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality." He performed this review for every month of the engagement, often billing two to five hours per session, sometimes multiple sessions per week, and occasionally billing the same review task for the same month on consecutive days.

103. White & Case then routed the same time entries through a second layer of reviewers who spent an additional 8.4 hours reviewing the same pro forma entries for privilege. A third associate billing at $1,370 per hour spent 1.3 hours doing the same privilege review that the second attorney had already performed. A fourth associate billing at $1,370 per hour then spent 13.4 hours across six entries "reviewing and revising" the fee statements that had already been drafted.

104. In total, four attorneys at rates ranging from $870 to $1,370 per hour reviewed the same set of time entries in sequence, each performing a function that could have been handled by a single competent billing coordinator, or at least one associate at reasonable hourly rate.

105. The layering did not end with the associates. After the fee statements were drafted and reviewed by four associate attorneys, three additional partners and counsel reviewed them again.

106. The final fee application narrative itself was drafted by an associate who billed 7.3 hours ($9,344) on a single day.

107. The fee application process illustrates in miniature the same billing pathology that infected every other workstream in this case. A task that should have required one staff attorney to compile time entries and one associate to draft the application instead consumed twelve attorneys across three months.

EXCESSIVE CLAIMS ADMINISTRATION

108. White & Case billed the estate $44,656.00 under the Claims Administration and Objections category (B07) across 26 entries and nine separate timekeepers. The bulk of this work fell into two phases. In the first phase, during September and early October, attorneys reviewed bar date orders and proofs of claim, which is routine Committee monitoring work. In the second phase, which consumed the majority of the category, White & Case assigned two attorneys to research claim objection procedures.

109. The claim objection research is objectionable on two independent grounds. First, the duplication is self evident: two attorneys at a combined rate of $2,410 per hour conducted parallel research on identical legal issues, conferring with each other and with Partner Zatz at every step, when a single associate could have completed the work in a fraction of the time. Second, the nature of the research itself raises serious concerns.

110. White & Case holds itself out as one of the preeminent restructuring practices in the country and charges the estate rates premised on that expertise. A firm billing at these rates should not need 14.4 hours of associate time to research how to file a claim objection in bankruptcy court. These are foundational procedures that any competent bankruptcy practitioner would know without billing the estate for the education.

111. White & Case billed $44,656.00 to "review" and "analyze" proofs of claim, and researching "claim objection procedures". Reviewing claims that aren't even being litigated yet is premature, yet White & Case billed the estate for this. Furthermore, a law firm of this caliber who charges an average hourly rate of $1,414.00 should presumably know claim objection procedures, and not bill the estate to research this issue.

VIII. RELIEF REQUESTED

A. PRIMARY RELIEF: COMPLETE DENIAL OF ALL COMPENSATION UNDER §§ 328(C), 330(A)(4)(A), AND THE COURT'S INHERENT AUTHORITY

112. As its primary relief, the Reorganized Debtors respectfully request that this Court deny White & Case's Final Fee Application in its entirety and award no compensation whatsoever under 11 U.S.C. §105.

113. White & Case was retained under §1103 to serve the interests of unsecured creditors and the estate. Instead, within days of its retention, White & Case delivered an ultimatum, pay $30

million to the unsecured class or the estate professionals would generate $30 million in fees, that placed its own fee interest in direct sub with the interest of the estate it was retained to serve.

114. *Second*, Section 330(a)(4)(A) provides that the Court "shall not allow compensation for . . . services that were not . . . reasonably likely to benefit the debtor's estate" or "not necessary to the administration of the case." 11 U.S.C. § 330(a)(4)(A)(ii). As demonstrated in this Objection, White & Case's core litigation strategy was not pursued because it was reasonably likely to benefit the estate. It was pursued to execute the fee-generation threat.

115. *Third*, the Court possesses inherent authority to supervise the professionals it appoints and to deny compensation when those professionals abuse their fiduciary position. White & Case, as a court-appointed professional owes fiduciary duties to the estate and its creditors.

116. A professional who weaponizes its court-approved status to threaten the estate with $30 million in fees unless its settlement demand is met has breached those fiduciary duties in the most fundamental way. The Court's inherent authority to police its own officers provides an independent basis to deny all compensation. *See also* 11 U.S.C. § 105(a) (court may "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of" the Bankruptcy Code).

117. A professional whose entire billing record reflects the execution of an extortionate threat is not entitled to be compensated by the estate it threatened.

A. First Alternative Relief: Drastic Reduction Under §330 and Equitable Subordination of the Remaining Fees Under §510(c)

118. In the alternative, if the Court declines to deny all compensation, the Reorganized Debtors request that the Court (a) drastically reduce White & Case's fees and expenses under 11 U.S.C. § 330 and (b) equitably subordinate the remaining allowed fees under 11 U.S.C. § 510(c).

119. As detailed in this Objection, the §330 factors compel drastic reduction in every single category billed. White & Case's fees are unreasonable under §330(a)(3) because of: (a) the deployment of 54 timekeepers in a 111-day case; (b) systematic gang billing, (c) a bankruptcy rate premium of $142 per hour above the firm's own non-bankruptcy rates; (d) block billing, (e) lumped entries, and vague time descriptions that prevent meaningful review; (e) admitted overlap between billing categories; (f) failure to submit any budget despite the U.S. Trustee Guidelines' expectation of budgeting; and (g) a cost-benefit disproportion in which White & Case's fees alone consumed approximately 44% of the maximum $32 million cash-out pool.

120. The vast majority of the fees are not "reasonable" under §330(a)(3) and are not "reasonably likely to benefit the debtor's estate" under §330(a)(4)(A), and should be drastically reduced, and equitably subordinated.

Equitable Subordination

121. The Reorganized Debtors further request that the Court equitably subordinate the remaining allowed portion of White & Case's fees under 11 U.S.C. § 510(c).

122. Section 510(c)(1) of the Bankruptcy Code provides:

> [A]fter notice and a hearing, the court may — (1) under principles of equitable subordination, subordinate for purposes of distribution all or part of an allowed claim to all or part of another allowed claim or all or part of an allowed interest to all or part of another allowed interest.

123. The Fifth Circuit established the controlling framework for equitable subordination in *Benjamin v. Diamond (In re Mobile Steel Co.)*, 563 F.2d 692, 699–700 (5th Cir. 1977). Under Mobile Steel, three conditions must be satisfied:

a. The claimant must have engaged in some type of inequitable conduct;

b. The misconduct must have resulted in injury to the creditors of the debtor or conferred an unfair advantage on the claimant; and

c. Equitable subordination of the claim must not be inconsistent with the provisions of the Bankruptcy Code.

124. The *Mobile Steel* court further identified three general categories of misconduct that may warrant equitable subordination: (1) fraud, illegality, or breach of fiduciary duty; (2) undercapitalization; and (3) the claimant's use of the debtor as a mere instrumentality or alter ego. *Id*. at 700. Subsequent courts have recognized that equitable subordination may be applied to any creditor engaging in inequitable conduct, not merely insiders. See, e.g., *In re LightSquared, Inc.*, 504 B.R. 321 (BANKR. S.D.N.Y. 2013) (subordinating claims of non-insider creditor that breached implied covenant of good faith).

125. Here, A professional retained under § 1103 of the Bankruptcy Code occupies a position of trust. Committee professionals are fiduciaries to the estate and its creditors. See 11 U.S.C. § 1103(c) ("[A] committee appointed under section 1102 of this title may . . . perform such other services as are in the interest of those represented"). A committee professional that weaponizes its own fee-generating capacity to coerce settlement has engaged in inequitable conduct fundamentally inconsistent with this fiduciary obligation.

126. The $30 million threat constituted precisely the type of overreaching and coercive behavior that equity courts have long condemned. By presenting the estate with this demand— pay $30 million to the class or we will consume $30 million in fees — White & Case leveraged their privileged position as court-approved professionals to extract economic value for themselves rather than their constituents.

127. This is the functional equivalent of a "hold-up" or "siege" strategy, designed to impose costs on the estate until the other parties capitulate. The Consenting Creditors explicitly identified this tactic: the Committee's "view seems to be that it has nothing to lose and that it might as well try to press operationally struggling Debtors and very invested secured creditors into surrender by piling expenses onto the estate.

128. The inequitable nature of this conduct is underscored by the objective weakness of the Committee's underlying legal theories discussed above.

129. Despite this, White & Case pursued a course of maximum fee generation, including unnecessary discovery, and conducting extensive confirmation hearing litigation, all consistent with their original threat.

130. The injury to the Debtors' estate and its creditors is direct and quantifiable. Every dollar in professional fees approved as an administrative expense under §§ 503(b)(2) and 330 is a dollar unavailable for distribution. Moreover, White & Case derived a direct and unfair advantage from the threatened conduct: the generation of over $14 million in professional fees and expenses in less than a four-month period.

131. Equitable subordination of White & Case's fee claim is entirely consistent with the Bankruptcy Code. The Code contemplates that professionals serve the estate and its creditors, not themselves. See 11 U.S.C. §§ 330(a)(4)(A) (prohibiting fees for services "not necessary to the administration of the case"), 328(a) (authorizing retention on "reasonable terms"). Using the professional fee mechanism as a coercive bargaining weapon perverts the very purpose of §§ 327, 328, 330, and 1103. Subordinating the fees generated through such conduct vindicates the Code's requirement that professional compensation be for "actual, necessary services" and restores creditors to the position they would have occupied had the inequitable conduct not occurred.

132. The Reorganized Debtors request that the Court, under § 510(c) of the Bankruptcy Code, equitably subordinate all or a significant portion of White & Case's fee claim. To the extent the Court determines that equitable subordination under § 510(c) is not the appropriate vehicle, the Reorganized Debtors request that the Court exercise its broad equitable powers under § 105(a) and its inherent authority under § 330 to deny all requested fees or reduce White & Case's fees to account for the coercive and extortionate nature of the fee threat and the resulting litigation strategy.

133. The remedy of equitable subordination is remedial, not punitive, and should be "tailored to offset the specific harm." *In re Mobile Steel*, 563 F.2d at 701. The Court should subordinate White & Case's fee claim to the extent necessary to offset the harm inflicted on the estate — that is, the excess fees generated by the "siege strategy" that would not have been incurred had the Committee professionals pursued a reasonable, targeted, and good-faith approach to their representation.

B. SECOND ALTERNATIVE RELIEF: DRASTIC REDUCTION UNDER §330 WITHOUT SUBORDINATION

134. In the further alternative, if the Court declines to apply equitable subordination, the Reorganized Debtors request at minimum that the Court exercise its authority under 11 U.S.C. § 330 to drastically reduce White & Case's fees and expenses as discussed above.

IX. PRAYER AND CONCLUSION

WHEREFORE, ModivCare Topco, LLC respectfully requests that this Court enter an order:

1. Denying White & Case's Final Fee Application in its entirety pursuant to 11 U.S.C. §§ 328(c), 330(a)(4)(A), and 105(a), and awarding no compensation whatsoever;
2. In the alternative, drastically reducing the fees and expenses under 11 U.S.C. § 330 and equitably subordinating any remaining allowed fees under 11 U.S.C. § 510(c);
3. In the further alternative, drastically reducing the fees and expenses under 11 U.S.C. § 330; and
4. Granting such other and further relief as the Court deems just and proper, including but not limited to the disallowance of specific categories and entries identified in this Objection and any additional entries or categories identified at or before the hearing.

Date: March 5, 2026.

Respectfully submitted,

WALKER & PATTERSON, P.C.

By: */s/ Miriam T. Goott*

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CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the foregoing Objection was served electronically upon all parties entitled to notice pursuant to this Court's CM/ECF electronic noticing platform on March 5, 2026.

By:*/s/Miriam T. Goott*
Miriam T. Goott

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

MODIVCARE TOPCO, LLC'S MOTION TO COMPEL WHITE & CASE, LLP TO RESPOND TO DISCOVERY REQUESTS

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, ModivCare Topco, LLC (**"ModivCare")** and files this Motion to Compel White & Case, LLP to Respond to Discovery Requests, and would respectfully show the Court as follows:

SUMMARY OF FACTS AND RELIEF REQUESTED

White & Case LLP ("White & Case") seeks over $14 million in purported fees and expenses for 111 days of work. After ModivCare filed a detailed objection challenging the propriety and reasonableness of those fees, it served narrowly tailored discovery requests focused on the specific issues raised in that objection.

White & Case has categorically refused to produce any documents, admits it has not conducted any search for responsive materials, has not identified a single document being withheld, and has failed to provide a privilege log as required by the Federal Rules. Instead, it has asserted broad objections to every request and taken the untenable position that no discovery should occur. Effectively, White & Case asks the Court to approve its fee request based solely on its unilateral submissions, without providing an opportunity for even a cursory examination of the facts underlying the purported fees. This approach is inconsistent with the Federal Rules of Civil Procedure, the standards governing fee applications under 11 U.S.C. § 330, and fundamental principles of fairness and transparency.

White & Case's refusal to engage in discovery is especially concerning given its acknowledgment that it has not begun to search for responsive materials. A party cannot assert burdensomeness, irrelevance, or privilege in the abstract while declining to determine what documents actually exist.

Accordingly, ModivCare respectfully requests that the Court overrule White & Case's objections in their entirety and compel full and complete responses to the Requests for Production.

RELEVANT BACKGROUND FACTS

1. On February 12, 2026, White & Case filed its Final Fee Application [Docket No. 1290], seeking a final allowance of $13,893,521.00 in attorney's fees and an additional $300,469.13 in expenses (the **"Fee Application"**).

2. In its Fee Application, White & Case affirmatively represents that it has "satisfied its burden to demonstrate that its fees are reasonable."

3. On March 5, 2026, ModivCare filed its Objection to the Fee Application (the **"Objection"**) [ECF No. 1354], challenging both the propriety and reasonableness of the fees sought.

4. On March 12, 2026, ModivCare served narrowly tailored Requests for Production on White & Case directed to the issues raised in the Objection (the **"RFP**"). **(See Exhibit A).**

5. On April 2, 2026, White & Case served its Responses and Objections to the RFP (the **"Responses"**). **(See Exhibit B)**.

6. White & Case has refused to produce a single document, has not conducted any search for responsive materials, and has asserted across-the-board objections while withholding all information. White & Case has taken the position that it is entitled to recover more than $14 million in purported fees without providing any meaningful transparency into how those purported fees were generated.

ATTEMPTS TO CONFER

7. Prior to filing this Motion to Compel, undersigned counsel conferred with White & Case in a good faith effort to resolve the issues raised herein without Court intervention.

8. White & Case's position was unequivocal: it contends that this Court can and should determine the reasonableness of its $14 million fee request based solely on the record "as it exists today," without any discovery.

9. That position ignores the obvious. The existing record reflects only what has been filed, not the underlying facts concerning how those purported fees were generated, including, but not limited to, internal billing practices, staffing decisions, and other conduct that occurred outside the presence of the Court.

10. During the conference, White & Case expressly acknowledged that it had not conducted any search for responsive documents and did not intend to do so unless ordered by the Court.

11. White & Case's position is untenable. A party cannot refuse to search for responsive documents and, at the same time, assert that requests are unduly burdensome, irrelevant, or privileged. Such objections necessarily require a reasonable inquiry. Without one, they lack any factual basis and do not comply with the obligations imposed by Rule 26(g).

12. Despite these discussions, White & Case refused to modify its position, produce any documents, withdraw its general objections, or provide a privilege log, thereby necessitating this Motion.

BLANKET REFUSAL TO PROVIDE ANY DISCOVERY

13. White & Case's core position that no discovery is permitted and that the Court must decide its Fee Application solely on the existing record is legally and factually incorrect.

14. ModivCare's Objection raises serious concerns, including:

a. Purported fees were generated through coercive tactics;

b. Excessive staffing and billing practices; and

c. Work performed that was neither necessary nor beneficial to the estate.

15. None of these issues can be adequately examined based solely on the docket and pleadings. Critical information, including internal communications, staffing decisions, billing practices, and budgetary judgments, exists exclusively in White & Case's own files. Their refusal to produce

these materials prevents ModivCare from testing the reasonableness of the purported fees claimed.

GENERAL OBJECTIONS MUST BE STRICKEN

16. In response to all 16 requests contained in the Requests for Production, White & Case asserts that it **"will not produce documents responsive to this request at this time."**

17. White & Case asserts no fewer than 32 general objections to ModivCare's Requests for Production.

18. Specifically, White & Case:

a. Asserts a blanket objection that ModivCare is not entitled to any discovery regarding its purported fees and insists the Court must decide the matter solely on White & Case's fee application and knowledge of the proceedings.

b. Objects to every request as overly broad, unduly burdensome, not proportional to the needs of the case, and harassing, without explaining how these generic objections apply to the specific documents sought.

c. Objects to every request as seeking information that is not relevant or necessary to resolving its fee application.

d. Claims privilege over broad categories of documents without identifying any materials withheld or providing a privilege log.

e. Argues that the requests seek information already in ModivCare's possession and simultaneously claims that this information is privileged.

f. Objects to every single request as "overly broad, unduly burdensome, and not proportional to the needs of the case" without specifying how these generic objections apply to the specific documents sought.

19. General, or blanket objections are improper and prohibited, and have been for many years:

> The "prohibition against general [or blanket] objections to discovery requests has been long established." *Hall v. La*., Civ. A. No. 12-657-BAJ-RLB, 2014 U.S. Dist. LEXIS 77180, 2014 WL 2560579, at *1 (M.D. La. June 6, 2014). Rule 33(b)(4) requires that "grounds for an objection to an interrogatory shall be stated with specificity." FED. R. CIV. P. 33(b)(4). And Rule 34(b) requires that a response to a request for production of documents, electronically stored information, and tangible things "must either state that inspection and related activities will be permitted as requested or state an objection to the request, including the reasons." FED. R. CIV. P. 34(b)(2)(B). In short, "[o]bjections to discovery must be made with specificity, and the responding party has the obligation to explain and support its objections." *Cartel Asset Mgmt. v. Ocwen Fin. Corp*., No. 01-cv-01644-REB-CBS, 2010 U.S. Dist. LEXIS 17857, 2010 WL 502721, at *10 (D. Colo. Feb. 8, 2010).
>
> Another court has put the matter at hand well: "General objections such as the ones asserted by [Defendant] are meaningless and constitute a waste of time for opposing counsel and the court. In the face of such objections, it is impossible to know whether information has been withheld and, if so, why. This is particularly true in cases like this where multiple 'general objections' are incorporated into many of the responses with no attempt to show the application of each objection to the particular request." *Weems v. Hodnett*, No. 10-cv-1452, 2011 U.S. Dist. LEXIS 80746, 2011 WL 3100554, at *1 (W.D. La. July 25, 2011).
> *Heller v. City of Dallas*, 303 F.R.D. 466, 483 (N.D. Tex. 2014)

20. These objections should be stricken in their entirety.

BOILERPLATE OBJECTIONS ARE INVALID AND WAIVED

21. For every request, White & Case repeats the same formulaic objections: “overly broad,” “unduly burdensome,” “not proportional,”, “privileged” and “irrelevant.”

22. These are textbook boilerplate objections. They are legally insufficient because White & Case:

a. Provides no facts supporting an alleged burden;

b. Does not quantify cost or effort; and

c. Does not explain why the requests are disproportionate.

23. White & Case's boilerplate objections should be stricken.

> So-called boilerplate or unsupported objections — even when asserted in response to a specific discovery request and not as part of a general list of generic objections preceding any responses to specific discovery requests — are likewise improper and ineffective and may rise (or fall) to the level of what the Fifth Circuit has described as "an all-too-common example of the sort of 'Rambo tactics' that have brought disrepute upon attorneys and the legal system." *McLeod, Alexander, Powel & Apffel, P.C. v. Quarles*, 894 F.2d 1482, 1484-86 (5th Cir. 1990)(holding that simply objecting to requests as "overly broad, burdensome, oppressive and irrelevant," without showing "specifically how each [request] is not relevant or how each question is overly broad, burdensome or oppressive," is inadequate to "voice a successful objection"); see also *Anderson v. Caldwell Cty. Sheriff's Office*, No. 1:09cv423, 2011 U.S. Dist. LEXIS 62263, 2011 WL 2414140, at *3 (W.D.N.C. June 10, 2011) ("Moreover, there is no provision in the Federal Rules that allows a party to assert objections simply to preserve them. Instead, the Federal Rules require that objections be specific."); *Mancia v. Mayflower Textile Services. Co.*, 253 F.R.D. 354, 358 (D. Md. 2008)(noting that, despite Rule 26(g), "boilerplate objections that a request for discovery is 'overboard and unduly burdensome, and not reasonably calculated to lead to the discovery of material admissible in evidence,' persist despite a litany of decisions from courts, including this one, that such objections are improper unless based on particularized facts" (citation omitted)).
>
> Another court has observed that "[the] failure to particularize [overbreadth, undue burden, and relevance] objections as required leads to one of two conclusions: either the [responding parties] lacked a factual basis to make the objections that they did, which would violate Rule 26(g), or they complied with Rule 26(g), made a reasonable inquiry before answering and discovered facts that would support a legitimate objection, but they were waived for failure to specify them as required." *Mancia*, 253 F.R.D. at 364.
>
> *Heller v. City of Dallas*, 303 F.R.D. 466, 483-84 (N.D. Tex. 2014)

24. Worse, White & Case admitted it **did not conduct ***any*** search** for responsive documents.

A party cannot claim burden or proportionality without first making a reasonable, or in this case,

any, inquiry. Rule 26(g) requires exactly that. These objections should be overruled.

PRIVILEGE ASSERTIONS ARE IMPROPER AND WAIVED

25. White & Case asserts sweeping privilege objections to nearly every Request for Production, yet fails to identify a single specific document withheld, provides no privilege log, and admits that it has not conducted any search for responsive materials. This is improper. A party cannot assert blanket privilege objections while refusing to identify what documents are being withheld or on what basis.

26. White & Case further fails to articulate any specific privilege with respect to any particular document or category of documents. Instead, it reflexively invokes the attorney-client privilege, the work product doctrine, and "any other applicable privilege, immunity, or protection," without limitation or explanation. Such undifferentiated, catch-all assertions are legally insufficient.

27. Moreover, none of the Requests for Production seek communications between White & Case and its client, the Committee. Rather, the Requests are directed to internal communications regarding billing practices, staffing, and fee preparation. These are subjects that, in the ordinary course, do not implicate privileged legal advice.

28. White & Case's blanket and unsupported privilege objections are improper, result in waiver, and should be stricken.

THE "ALREADY IN YOUR POSSESSION" OBJECTION IS BASELESS

29. White & Case repeatedly asserts that responsive information is already in ModivCare's possession.

30. It is unclear how communications among White & Case's employees could possibly be in ModivCare's possession, especially when White & Case simultaneously claims that the very same communications are privileged.

THE REQUESTS ARE NARROW, TARGETED AND DIRECTLY RELEVANT

31. The Requests are limited to a 111-day engagement and focus on discrete, critical issues including (a) billing practices, (b) staffing decisions, (c) fee application preparations; (d) deposition preparation; (e) budget; and (f) coercive conduct tied to fee generation. These topics go directly to whether the fees were reasonable, necessary and beneficial to the estate under 11 U.S.C. §330.

32. White & Case's repeated assertion that these topics are "not relevant" is neither credible nor tenable.

SPECIFIC EXAMPLES OF DEFICIENT RESPONSES/OBJECTIONS

RFP NO. 1 -3 AND 13-14 (BILLING PRACTICES AND STAFFING)

33. These requests seek internal communications regarding billing expectations, staffing decisions, and time entry practices on this specific case for a 111-day time period.

34. White & Case argues these issues can be resolved from the existing record. That is incorrect. The record shows what was billed, not:

a. Why hours were generated in the first instance, including whether tasks, and the associated staffing, were necessary or duplicative;

b. Whether internal expectations, targets, or pressures existed regarding (i) the amount of fees to be billed in the case or (ii) total hours to be billed by individual timekeepers;

c. How staffing decisions were made, including whether the number of timekeepers assigned to particular tasks was driven by legitimate case needs or by a desire to increase billable hours;

d. Whether time entries were recorded contemporaneously or influenced by internal guidance regarding billing practices;

e. Whether "voluntary reductions" referenced in the fee application reflect genuine billing judgment or post hoc adjustments designed to justify an otherwise excessive fee request; and

f. Whether time entries were reconstructed.

35. They go to the heart of whether the purported fees were "reasonable," "necessary," and "beneficial to the estate" under § 330.

36. White & Case's burden objection is equally defective. A party cannot claim that a request is unduly burdensome while simultaneously admitting that it has not conducted any search for responsive documents. Without undertaking a reasonable inquiry, White & Case has no factual basis to assert burden, cost, or proportionality. Such objections violate Rule 26(g) and should be disregarded.

37. Finally, White & Case's blanket invocation of privilege is improper. These requests are expressly limited to internal communications among firm personnel concerning billing and staffing. Such communications do not, in the ordinary course, involve client confidences or legal advice and therefore are not protected by the attorney-client privilege. Nor do they constitute protected work product where they concern administrative or billing practices rather than litigation strategy. Furthermore, no privilege log was provided and no declaration was made that documents are being withheld as required.

38. In summary, these requests seek precisely the type of evidence necessary to test the reasonableness of a $14 million fee request. White & Case's refusal to produce any responsive documents cannot be sustained.

RFP NO. 4 (THE $30 MILLION DEMAND)

39. RFP No. 4 is narrowly tailored to support ModivCare's allegation that White & Case's fee generation was tied to a coercive demand that the estate either fund a $30 million payment or incur substantial professional fees. White & Case not only billed $14 million in purported fees and expenses, but its unnecessary litigation forced ModivCare to incur millions more in legal costs defending meritless disputes.

40. It seeks only communications among White & Case personnel concerning the $30 million demand to the extent those communications relate to billing practices or the relationship between that demand and anticipated or actual fees. RFP No. 4 expressly excludes communications reflecting legal strategy or mental impressions.

41. Furthermore, White & Case's objections on relevance and vagueness grounds are unsupportable. First, responsive documents would be directly probative of whether the purported fees were incurred in good faith and for proper purposes. Section 330 does not permit compensation for services pursued for improper leverage. Evidence bearing on this is plainly discoverable.

42. Second, the request is not vague. It identifies a specific event (the $30 million demand referenced in the Objection) and a specific subject matter (billing practices and fee generation). White & Case's claimed inability to understand the request is not credible.

43. Finally, any concern regarding privilege is addressed by the request itself, which specifically excludes legal strategy and mental impressions.

44. White & Case's refusal to search for or produce such materials is indefensible.

RFP NO. 5 – 7 (PRIOR FEE REDUCTIONS AND ALLEGATIONS OF IMPROPER BILLING PRACTICES)

45. RFP Nos. 5, 6 and 7 seek (i) court orders and rulings reducing or disallowing White &

Case's purported fees based on improper billing or litigation practices, and (ii) pleadings in other bankruptcy cases in which parties alleged materially similar misconduct.

46. These requests go directly to issues raised in the Objection, namely, whether the billing and litigation practices at issue here are isolated to this case or part of a broader, repeated pattern.

47. White & Case argues that materials from "other cases" are categorically irrelevant. That is incorrect. The Objection does not merely dispute line items. It alleges systemic billing and litigation practices, including, but not limited to, overstaffing, excessive billing, and "scorched earth" tactics designed to generate fees. Evidence that similar concerns have been raised or sustained by other courts is directly relevant because White & Case's state of mind, intent, and course of conduct are at issue in the Objection.

48. White & Case's assertion that the requests are overly broad because they seek materials from "any case" ignores both the nature of the issues and the ease of reasonable limitation. First, these requests are inherently self-limiting. They do not seek all documents from all cases. They seek a discrete subset of materials:

a. Judicial decisions addressing fee reductions or disallowances based on specific categories of misconduct; and

b. Pleadings asserting those same categories of misconduct.

49. White & Case never proposed any limitation to this request. Instead, it adopted an all-or-nothing position, refusing even to identify whether responsive materials exist.

50. That is not a proportionality objection. It is a refusal to engage in discovery.

51. White & Case contends that the requests are burdensome because responsive materials, "if they exist," are publicly available. That objection fails for multiple reasons. First, the requests seek materials known to White & Case, not materials theoretically available somewhere in the

public domain. White & Case is uniquely positioned to identify:

a. Cases in which its purported fees were challenged or reduced;

b. Allegations made against it; and

c. Rulings addressing its billing practices.

52. Here, ModivCare has no way of knowing which cases to search for. Without that foundational information, the "public availability" objection is meaningless. At minimum, White & Case should be required to identify responsive cases and provide basic information (case name, court, and docket number), even if the Court ultimately limits production of full pleadings or orders.

53. White & Case argues that terms such as "unnecessary litigation," "scorched earth tactics," or "billing not reasonably likely to benefit the estate" are vague.

54. White & Case is a sophisticated law firm whose hourly rates are among the highest in the country. It cannot plausibly claim that it does not understand these terms. Most importantly, White & Case did not seek clarification during the meet-and-confer process. It just refused to produce anything.

55. Finally, White & Case asserts that responding to these requests are burdensome without making any effort to conduct a search for responsive materials. It is troublesome on its face that there would be so many pleadings and orders entered against them for their billing practices that it would create such a burden.

RFP NO. 8 (COMMUNICATIONS REGARDING THE CONSENTING CREDITORS' STATEMENTS)

56. RFP No. 8 seeks internal communications among White & Case personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent those communications relate to billing practices, staffing decisions, or the volume of fees being generated in the

engagement. The request is expressly limited and excludes legal strategy or mental impressions.

57. This request goes to the core of the Reorganized Debtors' objection.

58. The Statement (filed early in the case) was not a routine pleading. It was a direct and explicit warning that White & Case's strategy appeared designed to generate escalating professional fees as leverage to extract a settlement. It specifically cautioned that such an approach would burden the estate with unnecessary costs and harm creditor recoveries.

59. RFP No. 8 asks a straightforward question: How did White & Case respond internally to that warning (if at all) with respect to its billing and staffing practices after the Statement was filed.

60. The Statement put White & Case on contemporaneous notice of the precise misconduct alleged in the Objection. Internal communications reflecting how White & Case reacted to that warning are directly probative of:

a. Whether White & Case recognized that its practices were being challenged as potentially excessive or abusive;

b. Whether White & Case adjusted (or consciously declined to adjust) its billing and staffing practices in response;

c. Whether purported fees incurred after the warning were undertaken with appropriate regard for cost discipline and estate impact; and

d. Whether the subsequent escalation in purported fees was anticipated and knowingly pursued despite the risks identified.

61. If White & Case internally acknowledged the concerns raised in the Statement yet continued the same practices, that evidence would be highly relevant to whether the resulting purported fees were "reasonable" or "necessary" under § 330.

62. White & Case again asserts that the issue can be resolved based on the existing record.

That argument fails for a simple reason: the record contains the warning, but not White & Case's response or reaction to the Statement.

63. Furthermore, White & Case's blanket assertion of privilege is improper. RFP No. 8 is carefully drafted to avoid privileged material. It does not seek communications with clients, legal advice or litigation strategy regarding how to respond to the Statement. To the extent any responsive document contains privileged material, White & Case should have produced a privilege log to comply with Rule 26.

64. Likewise, White & Case claims burden without evidence and despite admitting that it has not conducted any search. A proper burden objection requires a reasonable inquiry and an explanation of the efforts required to produce them. White & Case has provided none of that. Its conclusory assertion of burden, untethered to any actual investigation, should be disregarded.

65. Finally, the proportionality of this request is beyond dispute. White & Case seeks more than $14 million in purported fees and expenses. RFP No. 8 seeks a discrete category of internal communications tied to a single, pivotal event that directly relates to whether those purported fees were generated in good faith and with appropriate regard for the estate.

66. The likely burden of locating such communications is minimal compared to the significance of the purported fees at stake.

RFP NO. 9 (PREPARATION OF THE FINAL FEE APPLICATION)

67. RFP No. 9 seeks internal communications concerning the preparation and drafting of White & Case's Final Fee Application, including how time entries were categorized, allocated, described, and presented to the Court. This request goes directly to the accuracy, reliability, and transparency of the Fee Application itself.

68. White & Case's argument that these materials are not relevant is untenable. The Fee

Application is not self-proving. Internal communications concerning the preparation of the Fee Application are directly probative of whether it accurately reflects the underlying work performed or instead presents that work in a manner designed to justify the fees sought, including:

a. Reassigning time entries across project codes;

b. Allocating time across multiple categories;

c. Addressing acknowledged "overlap" between categories; and

d. These are core issues under § 330.

69. White & Case again asserts overbreadth, burden, and vagueness without support. The phrase "assignment or reassignment of time entries" is not vague; it describes a common billing practice, particularly where time is reorganized for presentation in a fee application. Furthermore, the request is limited to a 111-day engagement and a single Final Fee Application.

70. White & Case admits it has not conducted any search, rendering its burden objection baseless. To the extent responsive communications involve administrative decisions about billing presentation, they are not privileged. They do not involve client advice or litigation strategy, but rather how billing data is categorized and described.

71. If any responsive materials contain privileged content, White & Case could have redacted the documents and provided a privilege log. Instead, they refused production altogether.

RFP NO. 10 (DEPOSITION OUTLINES)

72. RFP No. 10 seeks deposition outlines prepared or used by White & Case in connection with depositions taken during the engagement, with an express allowance for redactions of any privileged material.

73. This request is directly relevant to whether the time spent on numerous (and similar) depositions and the number of attorneys involved in preparing deposition outlines was reasonable

and necessary under § 330.

74. The Fee Application shows how many hours were billed to prepare for depositions. It does not show whether that work product justified those hours. Deposition outlines are among the few documents that allow the Court to assess that issue in a meaningful way.

75. For example, if the same amount of time were billed to separate deposition outlines, yet they were nearly identical, then this would be important evidence for the Court to consider.

76. Furthermore, this request is narrow and includes built-in privilege protections. The request is limited to deposition outlines from a 111-day engagement which is a finite and easily identifiable category of documents.

77. It is also expressly tailored to address privilege concerns. White & Case is permitted to:

a. Redact attorney mental impressions;

b. Redact confidential client information; and

c. Withhold or log any portions that qualify as protected work product.

78. Given these built-in protections, privilege is not a valid basis to refuse production altogether. Similarly, the argument that the Court can assess reasonableness solely from the existing record ignores the obvious: the record does not reveal what work was actually performed prior to or at those depositions.

RFP NOS. 15–16 (TIME ENTRY METADATA, AUDIT TRAILS, AND BILLING SYSTEM IDENTIFICATION)

79. RFP Nos. 15 and 16 seek (i) documents sufficient to show when time entries were created, entered, modified, or submitted for billing; and (ii) documents sufficient to identify the billing or timekeeping system used by White & Case in connection with the Fee Application. Together, these requests address the reliability, integrity, and transparency of the billing records underlying White & Case's $14 million fee request.

80. RFP No. 15 seeks documents sufficient to show when time entries were created, entered, modified, or submitted for billing, including audit logs, metadata, or system-generated histories reflecting those events.

81. RFP No. 16, in particular, is foundational. Identifying the billing system used is a necessary predicate to understanding the data sought in RFP No. 15. Without that information, neither the Reorganized Debtors nor the Court can evaluate:

a. Whether the system preserves audit trails or metadata;

b. How time entries are created, edited, and stored;

c. Whether modifications are tracked and recoverable; and

d. What information exists to test the integrity of the billing records.

82. White & Case asserts that this information is "not relevant". However, these requests go directly to several core issues raised in the Objection, including:

a. Whether time entries were recorded contemporaneously or reconstructed after the fact;

b. Whether entries were modified, edited, or recharacterized prior to submission;

c. Whether billing judgment was exercised in real time or applied retroactively in anticipation of fee review; and

d. Whether the Fee Application reflects actual work performed or a curated presentation of that work.

83. White & Case's overbreadth and burden objections are equally defective. These requests are narrowly limited to a 111-day engagement and seek discrete categories of information maintained in the ordinary course of business within White & Case's own billing system. Identifying the system used and producing associated metadata or audit trails is not a document-

intensive exercise, it is an inquiry into information that law firms typically maintain as part of their standard billing practices.

84. Critically, White & Case admits it has not conducted any search or inquiry. Without investigating how its own billing system functions or what data it maintains, it has no factual basis to claim burden, cost, or disproportionality. Such unsupported assertions violate Rule 26(g) and should be disregarded.

85. White & Case's privilege objections are likewise improper. The information sought is administrative in nature. It does not reveal client communications, legal advice, or litigation strategy. To the extent any responsive material contains embedded privileged content, White & Case may redact that content and provide a privilege log. That is not a basis to refuse production altogether.

86. The proportionality of these requests is beyond dispute. White & Case seeks more than $14 million in purported fees and expenses. RFP Nos. 15 and 16 seek objective, system-generated evidence and basic foundational information necessary to test whether the underlying billing records are accurate and reliable. The minimal burden associated with producing this information is vastly outweighed by its importance.

87. White & Case's refusal to provide even this threshold level of transparency underscores its broader position that its billing practices are not subject to scrutiny. That position is contrary to the Federal Rules and the standards governing fee applications under § 330. The objections to RFP Nos. 15 and 16 should be overruled and full responses compelled.

WHEREFORE, ModivCare respectfully requests that the Court strike the objections outlined above, compel White & Case to produce all responsive documents, and grant such other and further relief, at law or in equity, to which ModivCare may be justly entitled.

Dated: April 3, 2026

Respectfully submitted,

By: */s/ Miriam Goott*
Miriam T. Goott
Attorney-in-charge
SBN 24048846
COUNSEL FOR MODIVCARE TOPCO, LLC

OF COUNSEL:
Walker & Patterson, P.C.
P.O. Box 61301
Houston, TX 77208
(713) 956-5577 (telephone)
mgoott@walkerandpatterson.com

CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the Motion to Compel was served upon White & Case LLP, via email to the following individuals on April 3, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

By: */s/ Miriam T. Goott*
Miriam T. Goott

CERTIFICATE OF CONFERENCE

I, Miriam T. Goott, certify that on April 3, 2026, I conferred with Mr. Zakia and Ms. Chase, attorneys at White & Case, regarding their objections and responses to the Requests for Production. White & Case has taken the position that no documents will be produced without a Court order. I notified them that I would be filing this Motion to Compel, and they oppose the relief requested.

By: */s/ Miriam T. Goott*
Miriam T. Goott

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

MODIVCARE TOPCO, LLC'S REQUESTS FOR PRODUCTION TO WHITE & CASE, LLP

To: White & Case, LLP via U.S. mail to 1221 Avenue of the Americas, New York, New York 10020, and via email to the following individuals on March 12, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

Pursuant to FED. R. CIV. P. 34, ModivCare Topco, LLC (**"ModivCare"**) serves this Requests for Production to White & Case, LLP (**"W&C"**). W&C's responses shall be served on ModivCare through its attorneys, Walker & Patterson, P.C. c/o Miriam T. Goott, by electronic transmission at mgoott@walkerandpatterson.com, within thirty (30) days of service of these Requests.

DEFINITIONS AND INSTRUCTIONS

For purposes of these Request for Production, the following definitions apply:

1. **"Billing Practices"** means any policies, directives, instructions, guidance, goals, targets, expectations, or commentary relating to the recording of time, the volume of hours billed or to be billed, the staffing of matters or tasks, the number of timekeepers assigned to any task or matter, the rates charged, voluntary reductions or write downs, or the review, revision, or editing of time entries.

2. **"Communication"** means any email, memorandum, instant message, text message, Slack message, Microsoft Teams message, or other written or electronic correspondence. Nothing in this definition is intended to require the production of communications protected by the attorney-client privilege or attorney work-product doctrine concerning legal strategy or mental impressions regarding the substantive legal issues in the Engagement.

3. **"Engagement"** means White & Case's retention as counsel to the Official Committee of Unsecured Creditors in In re ModivCare Inc., Case No. 25-90309, filed in the United States Bankruptcy Court for the Southern District of Texas.

4. **"Final Fee Application"** means the White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period September 9, 2025 through December 29, 2025 filed by White & Case at ECF No. 1290.

5. **"Objection"** means the objection filed at ECF No. 1354 to White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period September 9, 2025 through December 29, 2025 filed by White & Case at ECF No. 1290.

6. **"White & Case Personnel"** means any partner, associate, counsel, staff attorney, paraprofessional, legal assistant, project manager, litigation specialist, billing coordinator, finance department employee, or any other person employed by or affiliated with White & Case LLP who performed any function in connection with the Engagement.

7. **"Deposition Materials"** means any outline, script, question list, topic list, memorandum, template, or other preparatory document created, drafted, revised, or used by any White & Case Personnel in connection with the preparation for or conduct of any deposition taken during the

Engagement, including any subsequent iteration, revision, or adaptation of any such document for use in a later deposition.

INSTRUCTIONS

To the extent White & Case withholds any responsive document on the basis of attorney client privilege or work product protection, White & Case shall produce a privilege log identifying each withheld document by date, author, recipient, subject matter, and the specific privilege asserted.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All Communications among White & Case Personnel concerning Billing Practices in connection with the Engagement, including but not limited to any communications regarding the volume of hours to be billed to the Engagement, any targets or expectations regarding fees to be generated from the Engagement, or any instructions or guidance regarding increasing or decreasing the amount of time recorded by any timekeeper on any task or matter.

REQUEST NO. 2:

All Communications among White & Case Personnel concerning the staffing of the Engagement, including but not limited to any communications regarding the number of timekeepers to be assigned to any hearing, deposition, committee call, drafting task, or document review project, or any communications regarding whether particular timekeepers should bill time to the Engagement or to any particular task within the Engagement.

REQUEST NO. 3:

All Communications among White & Case Personnel concerning the review, revision, editing, reduction, or write down of time entries recorded in connection with the Engagement, including but not limited to any communications regarding the "voluntary reductions" referenced in the Final Fee Application, any communications identifying specific entries to be reduced or written off, any communications regarding whether particular time entry descriptions should be revised before submission, and any communications regarding the criteria applied in determining which entries to reduce.

REQUEST NO. 4:

All Communications among White & Case Personnel concerning the $30 million demand referenced in the Objection, to the extent such communications relate to Billing Practices or the relationship between the demand and the anticipated or actual level of professional fees in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions.

REQUEST NO. 5:

All orders, opinions, rulings, or decisions issued by any bankruptcy court in any case in which White & Case LLP served as counsel, that reduced, denied, or disallowed fees or expenses sought by White & Case on the basis of overstaffing, excessive billing, duplicative services, block billing, vague or insufficient time entries, unnecessary litigation, scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate, or any other billing practice or litigation conduct that resulted in a judicial finding that fees requested by White & Case were unreasonable, unnecessary, or otherwise not compensable.

REQUEST NO. 6:

All pleading filed in any bankruptcy court in any case in which White & Case LLP served as counsel that alleged or asserted that White & Case LLP: (a) overstaffed matters; (b) excessively billed; (c) duplicated services; (d) engaged in block billing; (e) submitted vague or insufficient time entries; (f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate.

REQUEST NO. 7:

All pleadings filed in any bankruptcy court in any case in which White & Case LLP served as counsel in which any party requested, sought, or argued for the reduction, denial, modification, or disallowance of any attorney's fees or costs requested by White & Case LLP, regardless of whether such request or objection was sustained, overruled, or otherwise resolved.

REQUEST NO. 8:

All Communications among White & Case Personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent such communications relate to Billing Practices, staffing decisions, or the volume of fees being generated in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions regarding the substantive

response to the Statement, but solely communications regarding whether and how the Statement should affect billing or staffing decisions.

REQUEST NO. 9:

All Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application, including but not limited to any communications regarding the assignment or reassignment of time entries to project codes or billing categories, any communications regarding the allocation of time entries across multiple project categories, any communications regarding the "overlap" between project categories that White & Case acknowledges in the Final Fee Application, any communications regarding which project code a particular time entry should be billed to or categorized under, any communications regarding the narrative descriptions included in the Final Fee Application, and any communications regarding how the work performed by White & Case Personnel should be presented, described, or organized in the Final Fee Application.

REQUEST NO. 10:

All deposition outlines prepared, drafted, revised, or used by any White & Case Personnel in connection with any deposition taken during the Engagement. White & Case may redact portions of any deposition outline reflecting attorney strategy, confidential client information, or other protected work product to address any privilege concerns.

REQUEST NO. 11:

All documents sufficient to show any internal budget, fee estimate, fee projection, or anticipated fee range prepared, drafted, or considered by White & Case LLP in connection with the Engagement, regardless of whether such budget, estimate, projection, or range was finalized, approved, or filed.

REQUEST NO. 12:

All Communications among White & Case Personnel concerning whether a budget, fee estimate, fee projection, or anticipated fee range should be prepared or filed in connection with the

Engagement, including any Communications discussing reasons for preparing, not preparing, filing, or not filing such a budget or estimate.

REQUEST NO. 13:

All Communications among White & Case Personnel concerning whether the professional fees incurred or anticipated to be incurred in connection with the Engagement were excessive, unusually high, disproportionate to the matters at issue, likely to draw objection, or otherwise at risk of reduction or disallowance by the Court.

REQUEST NO. 14:

All Communications among White & Case Personnel concerning the entry of time after the work was performed, including any Communications concerning delayed time entry, reconstruction of time entries, or instructions to enter time for prior dates.

REQUEST NO. 15:

All documents sufficient to show the date and time each time entry billed to the Engagement was created, entered into White & Case LLP's billing system, modified, or submitted for billing, including any audit logs, metadata, or system reports reflecting the creation, modification, and history of such entries.

REQUEST NO. 16:

All documents sufficient to identify the billing or timekeeping system used by White & Case LLP in connection with the Engagement,

Dated: March 12, 2026

Respectfully submitted,

By: */s/ Miriam Goott*
Miriam T. Goott
Attorney-in-charge
SBN 24048846
COUNSEL FOR MODIVCARE TOPCO, LLC

OF COUNSEL:
Walker & Patterson, P.C.
P.O. Box 61301
Houston, TX 77208
(713) 956-5577 (telephone)
mgoott@walkerandpatterson.com

CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the foregoing **Requests for Production** has been served upon White & Case LLP, via U.S. mail at 1221 Avenue of the Americas, New York, New York 10020, and via email to the following individuals on March 12, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

By: */s/ Miriam T. Goott*
Miriam T. Goott

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)
Debtors.[1]	)	(Jointly Administered)

WHITE & CASE, LLP'S RESPONSES AND OBJECTIONS TO THE REORGANIZED DEBTORS' REQUESTS FOR PRODUCTION

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (the "**Federal Rules**"), made applicable to this matter by Rules 7026, 7034, and 9014 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), White & Case, LLP ("**White & Case**"), by and through its undersigned counsel, hereby responds and objects (the "**Responses and Objections**") to *ModivCare TopCo, LLC's Requests for Production to White & Case, LLP* (the "**Requests**," and each a "**Request**") served by the reorganized debtors of the above-captioned debtors and debtors in possession (the "**Reorganized Debtors**") on March 12, 2026.

GENERAL OBJECTIONS

The following general objections ("**General Objections**") apply to each definition ("**Definition**"), instruction ("**Instruction**"), and Request, and shall have the same force and effect as if fully set forth in the response to each individual Request. To the extent that White & Case responds to a Request, White & Case reserves all objections as to relevance, materiality, competence, confidentiality, propriety, privilege, and admissibility, as well as to any and all other

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

objections on any ground that would require or permit the exclusion of the response, or any portion of the response, if the response were offered into evidence. White & Case objects as follows:

1. White & Case objects to each Definition, Instruction, and Request to the extent they purport to impose different or broader requirements or obligations than those contained in the Federal Rules, the Bankruptcy Rules, the Local Rules of the United States District Court for the Southern District of Texas, the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas, or any other applicable law, rule, or order of this Court (collectively, the "**Rules**"). White & Case will construct and respond to the Requests in a manner consistent with White & Case's obligations under the Rules.

2. White & Case objects to the Requests to the extent that they purport to require White & Case to conduct anything beyond a reasonable search for readily accessible information relevant, probative, and proportional to the needs of assessing the relief sought in *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Dkt. No. 1290] (the "**W&C Fee Application**").

3. White & Case objects to the Requests to the extent that they are overbroad, unduly burdensome, cumulative, or duplicative, not proportional to the needs of the case, or designed to harass White & Case. White & Case objects to the Requests to the extent that they call for the production of "all" or "any" Documents pertaining to a subject on the grounds that such Requests are overly broad, unduly burdensome and not proportional to the needs of the case so as to make it impossible to identify the limits of the inquiry. To the extent White & Case produces documents in response to any Request, White & Case does not represent that "all" or "any" documents responsive to any Request will be collected or produced.

4. White & Case objects to each and every Request to the extent that it is not reasonably limited in time or otherwise not limited to a time frame relevant to the W&C Fee Application. Each such Request is overly broad, unduly burdensome, and seeks the discovery of information or documents that are not relevant to the subject matter of this proceeding and/or not proportional to the needs of this case.

5. White & Case objects to the Requests to the extent that they seek disclosure of documents or information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest or joint defense privilege, or any other protection, privilege or immunity against disclosure available under any applicable law (collectively, "**Privileged Materials**"). To the extent White & Case produces documents, White & Case will not produce any Privileged Materials. White & Case expressly reserves the right to redact non-responsive, proprietary, commercially sensitive, privileged or protected portions of any documents that may be produced in response to the Requests. Pursuant to Federal Rule of Evidence 502(d) as well as any other applicable laws, rules, regulations, court orders, or agreements, if any Privileged Material is inadvertently produced or disclosed, White & Case does not waive or intend to waive any privilege or immunity from discovery pertaining to such Privileged Material or to any other documents or information and reserves the right to demand the return of all copies of any such document(s). To the extent that there are inconsistencies in the types of privilege or other protections asserted with respect to various copies of the same document, the most comprehensive privilege or protection is intended to apply to all copies of such document.

6. White & Case objects to the Requests to the extent that they seek documents containing confidential, personal, private, proprietary, or sensitive business information; or information protected from disclosure by any law (including, but not limited to, foreign laws),

court order, or any agreement with respect to confidentiality or non-disclosure (collectively, "**Confidential Materials**"). White & Case reserves the right to redact any documents that may be produced including, but not limited to, the right to redact personally identifying information.

7. White & Case objects to each Request to the extent it expressly or impliedly assumes the existence of facts or circumstances that do not or did not exist, or states or assumes legal or factual conclusions. White & Case does not admit any factual or legal premise in these Requests. White & Case's Responses and Objections should not be construed as: (a) any admission as to the propriety of any Request; (b) an agreement as to erroneous assumptions or incorrect factual predicates contained in any Request; (c) an acknowledgment that documents or other items responsive to any Request exist; (d) a waiver of the General Objections or the objections asserted in response to specific Requests; (e) an admission as to the relevance or admissibility into evidence of any documents, items, materials, communications, or information; (f) an admission, concession, or waiver as to the validity of any claim or defense; or (g) an agreement that requests for similar documents, items, materials, communications, or information will be treated similarly.

8. White & Case objects to each Request to the extent that it seeks information that is in the possession, custody, or control of the Reorganized Debtors, publicly available, or can be obtained from another more convenient, less expensive, or less burdensome source.

9. White & Cases objects to each Request to the extent that it seeks to impose an obligation to provide information not in White & Case's possession, custody, or control, or to create documents that do not exist.

10. To the extent any term defined or used in the Requests is used in responding to the Requests, it is not accepted or conceded that any such term or definition is appropriate, descriptive

or accurate.

11. White & Case objects to each Request to the extent that it requires White & Case to search for and produce electronically stored documents from sources that are not reasonably accessible because of undue burden or cost.

12. White & Case preserves (a) all rights to object on any ground to the use of any document or information produced in response to the Requests or the subject matter thereof, in any proceeding; and (b) all rights to object on any ground to any request for further responses to the Requests or any other document request.

13. Any documents produced in response to any Request are solely for use in these chapter 11 cases and shall be governed by the terms of the *Confidentiality Agreement and Stipulated Protective Order* [Dkt. No. 174] (the "**Protective Order**").

14. The Responses and Objections represent White & Case's present knowledge, information, and belief. White & Case reserves the right to supplement, amend, correct, clarify or modify these responses and objections as additional information becomes known, including based on discovery and future developments in this action.

OBJECTIONS TO DEFINITIONS

White & Case objects to the following definitions in the Requests. The failure to object to any of the definitions shall not be deemed a waiver of any objections or a concession that any of the definitions are factually accurate.

1. White & Case objects to the Definition of "Billing Practices" as it contains improper assumptions concerning alleged billing "goals, targets, [or] expectations" and "revision or editing of time entries." White & Case further objects to the Definition of "Billing Practices" as vague and ambiguous for its use of "commentary" and "volume of hours," which are undefined.

2. White & Case objects to the Definition of "Communication" to the extent that it purports to impose burdens or obligations on White & Case that are broader than, inconsistent with, or not authorized by the Rules. White & Case further objects to this Definition on the grounds that it is overbroad, unduly burdensome, seeks to impose burden and expense that outweigh their benefits, and is not proportional to the needs of the W&C Fee Application.

3. White & Case objects to the Definition of "White & Case Personnel" as vague and ambiguous, overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application, because it purports to include "any other person . . . affiliated with White & Case." White & Case will understand "White & Case Personnel" to refer only to those employed by White & Case.

4. White & Case objects to the Definition of "Deposition Materials" as overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application especially in light of its purported inclusion of "any subsequent iteration, revision, or adaptation of any such document for use in a later deposition." White & Case will understand "Deposition Materials" to refer to the specific materials enumerated in the Definition without reference to "any subsequent iteration, revision, or adaptation of any such document for use in a later deposition."

5. White & Case objects to the terms or phrases defined by the Debtors to the extent that those terms and phrases are vague or ambiguous or beyond their customary meanings. White & Case has made reasonable efforts to understand the terms in the Requests as used in context, but White & Case makes its responses and objections based on its understanding of such terms and reserves the right to amend the responses and objections herein if the Reorganized Debtors assert different meanings of such terms.

OBJECTIONS TO INSTRUCTIONS

White & Case objects to the Instructions. The Requests target the production of materials from White & Case, a law firm, related to work completed by White & Case during its retention in the above-captioned cases. The burden to review and log Privileged Materials in response to such Requests is excessive and not proportional to the needs of the W&C Fee Application. To the extent White & Case withholds any information on the basis of privilege, White & Case will seek to meet and confer regarding the Instructions as they relate to a privilege log.

SPECIFIC OBJECTIONS AND RESPONSES

Subject to and without waiving the foregoing General Objections, which are hereby expressly incorporated into each of the following specific objections and responses as if fully set forth therein, White & Case responds to the Reorganized Debtors' specific Requests as follows:

REQUEST FOR PRODUCTION NO. 1

All Communications among White & Case Personnel concerning Billing Practices in connection with the Engagement, including but not limited to any communications regarding the volume of hours to be billed to the Engagement, any targets or expectations regarding fees to be generated from the Engagement, or any instructions or guidance regarding increasing or decreasing the amount of time recorded by any timekeeper on any task or matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request on the basis

that it is vague and ambiguous, including because it requests production of communications concerning "Billing Practices," a vague and ambiguous term as defined in the Requests. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as seeking information already in the Reorganized Debtors' possession and refers the Reorganized Debtors to communications by and among White & Case and Latham & Watkins, LLP concerning weekly budgets for work performed by White & Case during the Engagement.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 2

All Communications among White & Case Personnel concerning the staffing of the Engagement, including but not limited to any communications regarding the number of timekeepers to be assigned to any hearing, deposition, committee call, drafting task, or document review project, or any communications regarding whether particular timekeepers should bill time to the Engagement or to any particular task within the Engagement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 3

All Communications among White & Case Personnel concerning the review, revision, editing, reduction, or write down of time entries recorded in connection with the Engagement, including but not limited to any communications regarding the "voluntary reductions" referenced in the Final Fee Application, any communications identifying specific entries to be reduced or written off, any communications regarding whether particular time entry descriptions should be revised before submission, and any communications regarding the criteria applied in determining which entries to reduce.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking

documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request No. 1.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 4

All Communications among White & Case Personnel concerning the $30 million demand referenced in the Objection, to the extent such communications relate to Billing Practices or the relationship between the demand and the anticipated or actual level of professional fees in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the phrase "relationship between the demand and the anticipated or actual level of professional fees" as vague and ambiguous. White & Case further objects to this Request as seeking documents or information

protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 5

All orders, opinions, rulings, or decisions issued by any bankruptcy court in any case in which White & Case LLP served as counsel, that reduced, denied, or disallowed fees or expenses sought by White & Case on the basis of overstaffing, excessive billing, duplicative services, block billing, vague or insufficient time entries, unnecessary litigation, scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate, or any other billing practice or litigation conduct that resulted in a judicial finding that fees requested by White & Case were unreasonable, unnecessary, or otherwise not compensable.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to the phrase "unnecessary litigation,

scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate" as vague, ambiguous, and undefined. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 6

All pleading [sic] filed in any bankruptcy court in any case in which White & Case LLP served as counsel that alleged or asserted that White & Case LLP: (a) overstaffed matters; (b) excessively billed; (c) duplicated services; (d) engaged in block billing; (e) submitted vague or insufficient time entries; (f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case

further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to the phrase "(f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate" as vague, ambiguous, and undefined. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 7

All pleadings filed in any bankruptcy court in any case in which White & Case LLP served as counsel in which any party requested, sought, or argued for the reduction, denial, modification, or disallowance of any attorney's fees or costs requested by White & Case LLP, regardless of whether such request or objection was sustained, overruled, or otherwise resolved.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White &

Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 8

All Communications among White & Case Personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent such communications relate to Billing Practices, staffing decisions, or the volume of fees being generated in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions regarding the substantive response to the Statement, but solely communications regarding whether and how the Statement should affect billing or staffing decisions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 9

All Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application, including but not limited to any communications regarding the assignment or reassignment of time entries to project codes or billing categories, any communications regarding the allocation of time entries across multiple project categories, any communications regarding the "overlap" between project categories that White & Case acknowledges in the Final Fee Application, any communications regarding which project code a particular time entry should be billed to or categorized under, any communications regarding the narrative descriptions included in the Final Fee Application, and any communications regarding how the work performed by White & Case Personnel should be presented, described, or organized in the Final Fee Application.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "assignment or reassignment of time entries." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request Nos. 1 and 3.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 10

All deposition outlines prepared, drafted, revised, or used by any White & Case Personnel in connection with any deposition taken during the Engagement. White & Case may redact portions of any deposition outline reflecting attorney strategy, confidential client information, or other protected work product to address any privilege concerns.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case objects to this Request to the extent it seeks documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege,

immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 11

All documents sufficient to show any internal budget, fee estimate, fee projection, or anticipated fee range prepared, drafted, or considered by White & Case LLP in connection with the Engagement, regardless of whether such budget, estimate, projection, or range was finalized, approved, or filed.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to show" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "anticipated fee range." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits

for the contested matter at issue. White & Case further objects to this Request as seeking information already in the Reorganized Debtors' possession and refers the Reorganized Debtors to, among other things, communications by and among White & Case and Latham & Watkins, LLP concerning weekly budgets for work performed by White & Case during the Engagement. White & Case further objects to this Request to the extent it is duplicative of Request No. 1.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 12

All Communications among White & Case Personnel concerning whether a budget, fee estimate, fee projection, or anticipated fee range should be prepared or filed in connection with the Engagement, including any Communications discussing reasons for preparing, not preparing, filing, or not filing such a budget or estimate.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "anticipated fee range." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection.

White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request Nos. 1 and 11.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 13

All Communications among White & Case Personnel concerning whether the professional fees incurred or anticipated to be incurred in connection with the Engagement were excessive, unusually high, disproportionate to the matters at issue, likely to draw objection, or otherwise at risk of reduction or disallowance by the Court.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested

matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 14

All Communications among White & Case Personnel concerning the entry of time after the work was performed, including any Communications concerning delayed time entry, reconstruction of time entries, or instructions to enter time for prior dates.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "delayed time entry, reconstruction of time entries." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case

will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 15

All documents sufficient to show the date and time each time entry billed to the Engagement was created, entered into White & Case LLP's billing system, modified, or submitted for billing, including any audit logs, metadata, or system reports reflecting the creation, modification, and history of such entries.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to show" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 16

All documents sufficient to identify the billing or timekeeping system used by White & Case LLP in connection with the Engagement[.]

RESPONSE TO REQUEST FOR PRODUCTION NO. 16

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to identify" without limitation.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

[*Remainder of Page Intentionally Left Blank]*

Dated: April 2, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

ORDER GRANTING MODIVCARE TOPCO, LLC'S MOTION TO COMPEL WHITE & CASE, LLP TO RESPOND TO DISCOVERY REQUESTS

[Relates to ECF No. __]

Upon consideration of ModivCare Topco, LLC's Motion to Compel White & Case LLP to Respond to Discovery Requests (the **"Motion"**), any response thereto, the arguments of counsel, and the record in this case, the Court finds that the Motion should be **GRANTED.**

It is **ORDERED** that:

1. All objections asserted by White & Case, LLP to ModivCare's Requests for Production are **OVERRULED.**
2. White & Case, LLP shall, within **7 days** of entry of this Order:
    a. Conduct a reasonable and diligent search for all documents and communications responsive to ModivCare's Requests for Production; and
    b. Produce all documents responsive to Requests for Production Nos. 1–16.

It is further **ORDERED** that the Court retains jurisdiction to enforce this Order.

SIGNED:_____

_____
UNITED STATES BANKRUPTCY JUDGE

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, ModivCare Topco, LLC (**"ModivCare")** and files this Motion to Compel White & Case, LLP to Respond to Discovery Requests, and would respectfully show the Court as follows:

SUMMARY OF FACTS AND RELIEF REQUESTED

White & Case LLP ("White & Case") seeks over $14 million in purported fees and expenses for 111 days of work. After ModivCare filed a detailed objection challenging the propriety and reasonableness of those fees, it served narrowly tailored discovery requests focused on the specific issues raised in that objection.

White & Case has categorically refused to produce any documents, admits it has not

conducted any search for responsive materials, has not identified a single document being withheld, and has failed to provide a privilege log as required by the Federal Rules. Instead, it has asserted broad objections to every request and taken the untenable position that no discovery should occur. Effectively, White & Case asks the Court to approve its fee request based solely on its unilateral submissions, without providing an opportunity for even a cursory examination of the facts underlying the purported fees. This approach is inconsistent with the Federal Rules of Civil Procedure, the standards governing fee applications under 11 U.S.C. § 330, and fundamental principles of fairness and transparency.

White & Case's refusal to engage in discovery is especially concerning given its acknowledgment that it has not begun to search for responsive materials. A party cannot assert burdensomeness, irrelevance, or privilege in the abstract while declining to determine what documents actually exist.

Accordingly, ModivCare respectfully requests that the Court overrule White & Case's objections in their entirety and compel full and complete responses to the Requests for Production.

RELEVANT BACKGROUND FACTS

1. On February 12, 2026, White & Case filed its Final Fee Application [Docket No. 1290], seeking a final allowance of $13,893,521.00 in attorney's fees and an additional $300,469.13 in expenses (the **"Fee Application"**).

2. In its Fee Application, White & Case affirmatively represents that it has "satisfied its burden to demonstrate that its fees are reasonable."

3. On March 5, 2026, ModivCare filed its Objection to the Fee Application (the **"Objection"**) [ECF No. 1354], challenging both the propriety and reasonableness of the fees sought.

4. On March 12, 2026, ModivCare served narrowly tailored Requests for Production on White & Case directed to the issues raised in the Objection (the **"RFP**"). (**See Exhibit A).**

5. On April 2, 2026, White & Case served its Responses and Objections to the RFP (the **"Responses"**). (**See Exhibit B)**.

6. White & Case has refused to produce a single document, has not conducted any search for responsive materials, and has asserted across-the-board objections while withholding all information. White & Case has taken the position that it is entitled to recover more than $14 million in purported fees without providing any meaningful transparency into how those purported fees were generated.

ATTEMPTS TO CONFER

7. Prior to filing this Motion to Compel, undersigned counsel conferred with White & Case in a good faith effort to resolve the issues raised herein without Court intervention.

8. White & Case's position was unequivocal: it contends that this Court can and should determine the reasonableness of its $14 million fee request based solely on the record "as it exists today," without any discovery.

9. That position ignores the obvious. The existing record reflects only what has been filed, not the underlying facts concerning how those purported fees were generated, including, but not limited to, internal billing practices, staffing decisions, and other conduct that occurred outside the presence of the Court.

10. During the conference, White & Case expressly acknowledged that it had not conducted any search for responsive documents and did not intend to do so unless ordered by the Court.

11. White & Case's position is untenable. A party cannot refuse to search for responsive documents and, at the same time, assert that requests are unduly burdensome, irrelevant, or privileged. Such objections necessarily require a reasonable inquiry. Without one, they lack any factual basis and do not comply with the obligations imposed by Rule 26(g).

12. Despite these discussions, White & Case refused to modify its position, produce any documents, withdraw its general objections, or provide a privilege log, thereby necessitating this Motion.

BLANKET REFUSAL TO PROVIDE ANY DISCOVERY

13. White & Case's core position that no discovery is permitted and that the Court must decide its Fee Application solely on the existing record is legally and factually incorrect.

14. ModivCare's Objection raises serious concerns, including:

a. Purported fees were generated through coercive tactics;

b. Excessive staffing and billing practices; and

c. Work performed that was neither necessary nor beneficial to the estate.

15. None of these issues can be adequately examined based solely on the docket and pleadings. Critical information, including internal communications, staffing decisions, billing practices, and budgetary judgments, exists exclusively in White & Case's own files. Their refusal to produce these materials prevents ModivCare from testing the reasonableness of the purported fees claimed.

GENERAL OBJECTIONS MUST BE STRICKEN

16. In response to all 16 requests contained in the Requests for Production, White & Case asserts that it **"will not produce documents responsive to this request at this time."**

17. White & Case asserts no fewer than 32 general objections to ModivCare's Requests for Production.

18. Specifically, White & Case:

a. Asserts a blanket objection that ModivCare is not entitled to any discovery regarding its purported fees and insists the Court must decide the matter solely on White & Case's fee application and knowledge of the proceedings.

b. Objects to every request as overly broad, unduly burdensome, not proportional to the needs of the case, and harassing, without explaining how these generic objections apply to the specific documents sought.

c. Objects to every request as seeking information that is not relevant or necessary to resolving its fee application.

d. Claims privilege over broad categories of documents without identifying any materials withheld or providing a privilege log.

e. Argues that the requests seek information already in ModivCare's possession and simultaneously claims that this information is privileged.

f. Objects to <u>every</u> single request as "overly broad, unduly burdensome, and not proportional to the needs of the case" without specifying how these generic objections apply to the specific documents sought.

19. General, or blanket objections are improper and prohibited, and have been for many years:

> The "prohibition against general [or blanket] objections to discovery requests has been long established." *Hall v. La.*, Civ. A. No. 12-657-BAJ-RLB, 2014 U.S. Dist. LEXIS 77180, 2014 WL 2560579, at *1 (M.D. La. June 6, 2014). Rule 33(b)(4) requires that "grounds for an objection to an interrogatory shall be stated with specificity." FED. R. CIV. P. 33(b)(4). And Rule 34(b) requires that a response to a request for production of documents, electronically stored information, and tangible things "must either state that inspection and related activities

> will be permitted as requested or state an objection to the request, including the reasons." FED. R. CIV. P. 34(b)(2)(B). In short, "[o]bjections to discovery must be made with specificity, and the responding party has the obligation to explain and support its objections." *Cartel Asset Mgmt. v. Ocwen Fin. Corp.*, No. 01-cv-01644-REB-CBS, 2010 U.S. Dist. LEXIS 17857, 2010 WL 502721, at *10 (D. Colo. Feb. 8, 2010).
>
> Another court has put the matter at hand well: "General objections such as the ones asserted by [Defendant] are meaningless and constitute a waste of time for opposing counsel and the court. In the face of such objections, it is impossible to know whether information has been withheld and, if so, why. This is particularly true in cases like this where multiple 'general objections' are incorporated into many of the responses with no attempt to show the application of each objection to the particular request." *Weems v. Hodnett*, No. 10-cv-1452, 2011 U.S. Dist. LEXIS 80746, 2011 WL 3100554, at *1 (W.D. La. July 25, 2011).
> *Heller v. City of Dallas*, 303 F.R.D. 466, 483 (N.D. Tex. 2014)

20. These objections should be stricken in their entirety.

BOILERPLATE OBJECTIONS ARE INVALID AND WAIVED

21. For every request, White & Case repeats the same formulaic objections: “overly broad,” “unduly burdensome,” “not proportional,”, “privileged” and “irrelevant.”

22. These are textbook boilerplate objections. They are legally insufficient because White & Case:

a. Provides no facts supporting an alleged burden;

b. Does not quantify cost or effort; and

c. Does not explain why the requests are disproportionate.

23. White & Case’s boilerplate objections should be stricken.

> So-called boilerplate or unsupported objections — even when asserted in response to a specific discovery request and not as part of a general list of generic objections preceding any responses to specific discovery requests — are likewise improper and ineffective and may rise (or fall) to the level of what the Fifth Circuit has described as "an all-too-

> common example of the sort of 'Rambo tactics' that have brought disrepute upon attorneys and the legal system." *McLeod, Alexander, Powel & Apffel, P.C. v. Quarles*, 894 F.2d 1482, 1484-86 (5th Cir. 1990)(holding that simply objecting to requests as "overly broad, burdensome, oppressive and irrelevant," without showing "specifically how each [request] is not relevant or how each question is overly broad, burdensome or oppressive," is inadequate to "voice a successful objection"); see also *Anderson v. Caldwell Cty. Sheriff's Office*, No. 1:09cv423, 2011 U.S. Dist. LEXIS 62263, 2011 WL 2414140, at *3 (W.D.N.C. June 10, 2011) ("Moreover, there is no provision in the Federal Rules that allows a party to assert objections simply to preserve them. Instead, the Federal Rules require that objections be specific."); *Mancia v. Mayflower Textile Services. Co.*, 253 F.R.D. 354, 358 (D. Md. 2008)(noting that, despite Rule 26(g), "boilerplate objections that a request for discovery is 'overboard and unduly burdensome, and not reasonably calculated to lead to the discovery of material admissible in evidence,' persist despite a litany of decisions from courts, including this one, that such objections are improper unless based on particularized facts" (citation omitted)).
>
> Another court has observed that "[the] failure to particularize [overbreadth, undue burden, and relevance] objections as required leads to one of two conclusions: either the [responding parties] lacked a factual basis to make the objections that they did, which would violate Rule 26(g), or they complied with Rule 26(g), made a reasonable inquiry before answering and discovered facts that would support a legitimate objection, but they were waived for failure to specify them as required." *Mancia*, 253 F.R.D. at 364.
>
> *Heller v. City of Dallas*, 303 F.R.D. 466, 483-84 (N.D. Tex. 2014)

24. Worse, White & Case admitted it **did not conduct *any* search** for responsive documents. A party cannot claim burden or proportionality without first making a reasonable, or in this case, **any**, inquiry. Rule 26(g) requires exactly that. These objections should be overruled.

PRIVILEGE ASSERTIONS ARE IMPROPER AND WAIVED

25. White & Case asserts sweeping privilege objections to nearly every Request for Production, yet fails to identify a single specific document withheld, provides no privilege log, and admits that it has not conducted any search for responsive materials. This is improper. A party

cannot assert blanket privilege objections while refusing to identify what documents are being withheld or on what basis.

26. White & Case further fails to articulate any specific privilege with respect to any particular document or category of documents. Instead, it reflexively invokes the attorney-client privilege, the work product doctrine, and "any other applicable privilege, immunity, or protection," without limitation or explanation. Such undifferentiated, catch-all assertions are legally insufficient.

27. Moreover, none of the Requests for Production seek communications between White & Case and its client, the Committee. Rather, the Requests are directed to internal communications regarding billing practices, staffing, and fee preparation. These are subjects that, in the ordinary course, do not implicate privileged legal advice.

28. White & Case's blanket and unsupported privilege objections are improper, result in waiver, and should be stricken.

THE "ALREADY IN YOUR POSSESSION" OBJECTION IS BASELESS

29. White & Case repeatedly asserts that responsive information is already in ModivCare's possession.

30. It is unclear how communications among White & Case's employees could possibly be in ModivCare's possession, especially when White & Case simultaneously claims that the very same communications are privileged.

THE REQUESTS ARE NARROW, TARGETED AND DIRECTLY RELEVANT

31. The Requests are limited to a 111-day engagement and focus on discrete, critical issues including (a) billing practices, (b) staffing decisions, (c) fee application preparations; (d) deposition preparation; (e) budget; and (f) coercive conduct tied to fee generation. These topics go directly to whether the fees were reasonable, necessary and beneficial to the estate under 11 U.S.C.

§330.

32. White & Case's repeated assertion that these topics are "not relevant" is neither credible nor tenable.

SPECIFIC EXAMPLES OF DEFICIENT RESPONSES/OBJECTIONS

RFP NO. 1 -3 AND 13-14 (BILLING PRACTICES AND STAFFING)

33. These requests seek internal communications regarding billing expectations, staffing decisions, and time entry practices on this specific case for a 111-day time period.

34. White & Case argues these issues can be resolved from the existing record. That is incorrect. The record shows what was billed, not:

a. Why hours were generated in the first instance, including whether tasks, and the associated staffing, were necessary or duplicative;

b. Whether internal expectations, targets, or pressures existed regarding (i) the amount of fees to be billed in the case or (ii) total hours to be billed by individual timekeepers;

c. How staffing decisions were made, including whether the number of timekeepers assigned to particular tasks was driven by legitimate case needs or by a desire to increase billable hours;

d. Whether time entries were recorded contemporaneously or influenced by internal guidance regarding billing practices**;**

e. Whether "voluntary reductions" referenced in the fee application reflect genuine billing judgment or post hoc adjustments designed to justify an otherwise excessive fee request**;** and

f. Whether time entries were reconstructed.

35. They go to the heart of whether the purported fees were "reasonable," "necessary," and "beneficial to the estate" under § 330.

36. White & Case's burden objection is equally defective. A party cannot claim that a request is unduly burdensome while simultaneously admitting that it has not conducted any search for responsive documents. Without undertaking a reasonable inquiry, White & Case has no factual basis to assert burden, cost, or proportionality. Such objections violate Rule 26(g) and should be disregarded.

37. Finally, White & Case's blanket invocation of privilege is improper. These requests are expressly limited to internal communications among firm personnel concerning billing and staffing. Such communications do not, in the ordinary course, involve client confidences or legal advice and therefore are not protected by the attorney-client privilege. Nor do they constitute protected work product where they concern administrative or billing practices rather than litigation strategy. Furthermore, no privilege log was provided and no declaration was made that documents are being withheld as required.

38. In summary, these requests seek precisely the type of evidence necessary to test the reasonableness of a $14 million fee request. White & Case's refusal to produce any responsive documents cannot be sustained.

RFP NO. 4 (THE $30 MILLION DEMAND)

39. RFP No. 4 is narrowly tailored to support ModivCare's allegation that White & Case's fee generation was tied to a coercive demand that the estate either fund a $30 million payment or incur substantial professional fees. White & Case not only billed $14 million in purported fees and expenses, but its unnecessary litigation forced ModivCare to incur millions more in legal costs

defending meritless disputes.

40. It seeks only communications among White & Case personnel concerning the $30 million demand to the extent those communications relate to billing practices or the relationship between that demand and anticipated or actual fees. RFP No. 4 expressly excludes communications reflecting legal strategy or mental impressions.

41. Furthermore, White & Case's objections on relevance and vagueness grounds are unsupportable. First, responsive documents would be directly probative of whether the purported fees were incurred in good faith and for proper purposes. Section 330 does not permit compensation for services pursued for improper leverage. Evidence bearing on this is plainly discoverable.

42. Second, the request is not vague. It identifies a specific event (the $30 million demand referenced in the Objection) and a specific subject matter (billing practices and fee generation). White & Case's claimed inability to understand the request is not credible.

43. Finally, any concern regarding privilege is addressed by the request itself, which specifically excludes legal strategy and mental impressions.

44. White & Case's refusal to search for or produce such materials is indefensible.

RFP NO. 5 – 7 (PRIOR FEE REDUCTIONS AND ALLEGATIONS OF IMPROPER BILLING PRACTICES)

45. RFP Nos. 5, 6 and 7 seek (i) court orders and rulings reducing or disallowing White & Case's purported fees based on improper billing or litigation practices, and (ii) pleadings in other bankruptcy cases in which parties alleged materially similar misconduct.

46. These requests go directly to issues raised in the Objection, namely, whether the billing and litigation practices at issue here are isolated to this case or part of a broader, repeated pattern.

47. White & Case argues that materials from "other cases" are categorically irrelevant. That is

incorrect. The Objection does not merely dispute line items. It alleges systemic billing and litigation practices, including, but not limited to, overstaffing, excessive billing, and "scorched earth" tactics designed to generate fees. Evidence that similar concerns have been raised or sustained by other courts is directly relevant because White & Case's state of mind, intent, and course of conduct are at issue in the Objection.

48. White & Case's assertion that the requests are overly broad because they seek materials from "any case" ignores both the nature of the issues and the ease of reasonable limitation. First, these requests are inherently self-limiting. They do not seek all documents from all cases. They seek a discrete subset of materials:

a. Judicial decisions addressing fee reductions or disallowances based on specific categories of misconduct; and

b. Pleadings asserting those same categories of misconduct.

49. White & Case never proposed any limitation to this request. Instead, it adopted an all-or-nothing position, refusing even to identify whether responsive materials exist.

50. That is not a proportionality objection. It is a refusal to engage in discovery.

51. White & Case contends that the requests are burdensome because responsive materials, "if they exist," are publicly available. That objection fails for multiple reasons. First, the requests seek materials known to White & Case, not materials theoretically available somewhere in the public domain. White & Case is uniquely positioned to identify:

a. Cases in which its purported fees were challenged or reduced;

b. Allegations made against it; and

c. Rulings addressing its billing practices.

52. Here, ModivCare has no way of knowing which cases to search for. Without that

foundational information, the "public availability" objection is meaningless. At minimum, White & Case should be required to identify responsive cases and provide basic information (case name, court, and docket number), even if the Court ultimately limits production of full pleadings or orders.

53. White & Case argues that terms such as "unnecessary litigation," "scorched earth tactics," or "billing not reasonably likely to benefit the estate" are vague.

54. White & Case is a sophisticated law firm whose hourly rates are among the highest in the country. It cannot plausibly claim that it does not understand these terms. Most importantly, White & Case did not seek clarification during the meet-and-confer process. It just refused to produce anything.

55. Finally, White & Case asserts that responding to these requests are burdensome without making any effort to conduct a search for responsive materials. It is troublesome on its face that there would be so many pleadings and orders entered against them for their billing practices that it would create such a burden.

RFP NO. 8 (COMMUNICATIONS REGARDING THE CONSENTING CREDITORS' STATEMENTS)

56. RFP No. 8 seeks internal communications among White & Case personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent those communications relate to billing practices, staffing decisions, or the volume of fees being generated in the engagement. The request is expressly limited and excludes legal strategy or mental impressions.

57. This request goes to the core of the Reorganized Debtors' objection.

58. The Statement (filed early in the case) was not a routine pleading. It was a direct and explicit warning that White & Case's strategy appeared designed to generate escalating professional fees as leverage to extract a settlement. It specifically cautioned that such an approach

would burden the estate with unnecessary costs and harm creditor recoveries.

59. RFP No. 8 asks a straightforward question: How did White & Case respond internally to that warning (if at all) with respect to its billing and staffing practices after the Statement was filed.

60. The Statement put White & Case on contemporaneous notice of the precise misconduct alleged in the Objection. Internal communications reflecting how White & Case reacted to that warning are directly probative of:

a. Whether White & Case recognized that its practices were being challenged as potentially excessive or abusive;

b. Whether White & Case adjusted (or consciously declined to adjust) its billing and staffing practices in response;

c. Whether purported fees incurred after the warning were undertaken with appropriate regard for cost discipline and estate impact; and

d. Whether the subsequent escalation in purported fees was anticipated and knowingly pursued despite the risks identified.

61. If White & Case internally acknowledged the concerns raised in the Statement yet continued the same practices, that evidence would be highly relevant to whether the resulting purported fees were "reasonable" or "necessary" under § 330.

62. White & Case again asserts that the issue can be resolved based on the existing record. That argument fails for a simple reason: the record contains the warning, but not White & Case's response or reaction to the Statement.

63. Furthermore, White & Case's blanket assertion of privilege is improper. RFP No. 8 is carefully drafted to avoid privileged material. It does not seek communications with clients, legal advice or litigation strategy regarding how to respond to the Statement. To the extent any

responsive document contains privileged material, White & Case should have produced a privilege log to comply with Rule 26.

64. Likewise, White & Case claims burden without evidence and despite admitting that it has not conducted any search. A proper burden objection requires a reasonable inquiry and an explanation of the efforts required to produce them. White & Case has provided none of that. Its conclusory assertion of burden, untethered to any actual investigation, should be disregarded.

65. Finally, the proportionality of this request is beyond dispute. White & Case seeks more than $14 million in purported fees and expenses. RFP No. 8 seeks a discrete category of internal communications tied to a single, pivotal event that directly relates to whether those purported fees were generated in good faith and with appropriate regard for the estate.

66. The likely burden of locating such communications is minimal compared to the significance of the purported fees at stake.

RFP NO. 9 (PREPARATION OF THE FINAL FEE APPLICATION)

67. RFP No. 9 seeks internal communications concerning the preparation and drafting of White & Case's Final Fee Application, including how time entries were categorized, allocated, described, and presented to the Court. This request goes directly to the accuracy, reliability, and transparency of the Fee Application itself.

68. White & Case's argument that these materials are not relevant is untenable. The Fee Application is not self-proving. Internal communications concerning the preparation of the Fee Application are directly probative of whether it accurately reflects the underlying work performed or instead presents that work in a manner designed to justify the fees sought, including:

a. Reassigning time entries across project codes;

b. Allocating time across multiple categories;

c. Addressing acknowledged "overlap" between categories; and

d. These are core issues under § 330.

69. White & Case again asserts overbreadth, burden, and vagueness without support. The phrase "assignment or reassignment of time entries" is not vague; it describes a common billing practice, particularly where time is reorganized for presentation in a fee application. Furthermore, the request is limited to a 111-day engagement and a single Final Fee Application.

70. White & Case admits it has not conducted any search, rendering its burden objection baseless. To the extent responsive communications involve administrative decisions about billing presentation, they are not privileged. They do not involve client advice or litigation strategy, but rather how billing data is categorized and described.

71. If any responsive materials contain privileged content, White & Case could have redacted the documents and provided a privilege log. Instead, they refused production altogether.

RFP NO. 10 (DEPOSITION OUTLINES)

72. RFP No. 10 seeks deposition outlines prepared or used by White & Case in connection with depositions taken during the engagement, with an express allowance for redactions of any privileged material.

73. This request is directly relevant to whether the time spent on numerous (and similar) depositions and the number of attorneys involved in preparing deposition outlines was reasonable and necessary under § 330.

74. The Fee Application shows how many hours were billed to prepare for depositions. It does not show whether that work product justified those hours. Deposition outlines are among the few documents that allow the Court to assess that issue in a meaningful way.

75. For example, if the same amount of time were billed to separate deposition outlines, yet

they were nearly identical, then this would be important evidence for the Court to consider.

76. Furthermore, this request is narrow and includes built-in privilege protections. The request is limited to deposition outlines from a 111-day engagement which is a finite and easily identifiable category of documents.

77. It is also expressly tailored to address privilege concerns. White & Case is permitted to:

a. Redact attorney mental impressions;

b. Redact confidential client information; and

c. Withhold or log any portions that qualify as protected work product.

78. Given these built-in protections, privilege is not a valid basis to refuse production altogether. Similarly, the argument that the Court can assess reasonableness solely from the existing record ignores the obvious: the record does not reveal what work was actually performed prior to or at those depositions.

RFP NOS. 15–16 (TIME ENTRY METADATA, AUDIT TRAILS, AND BILLING SYSTEM IDENTIFICATION)

79. RFP Nos. 15 and 16 seek (i) documents sufficient to show when time entries were created, entered, modified, or submitted for billing; and (ii) documents sufficient to identify the billing or timekeeping system used by White & Case in connection with the Fee Application. Together, these requests address the reliability, integrity, and transparency of the billing records underlying White & Case's $14 million fee request.

80. RFP No. 15 seeks documents sufficient to show when time entries were created, entered, modified, or submitted for billing, including audit logs, metadata, or system-generated histories reflecting those events.

81. RFP No. 16, in particular, is foundational. Identifying the billing system used is a necessary predicate to understanding the data sought in RFP No. 15. Without that information, neither the

Reorganized Debtors nor the Court can evaluate:

a. Whether the system preserves audit trails or metadata;

b. How time entries are created, edited, and stored;

c. Whether modifications are tracked and recoverable; and

d. What information exists to test the integrity of the billing records.

82. White & Case asserts that this information is "not relevant". However, these requests go directly to several core issues raised in the Objection, including:

a. Whether time entries were recorded contemporaneously or reconstructed after the fact;

b. Whether entries were modified, edited, or recharacterized prior to submission;

c. Whether billing judgment was exercised in real time or applied retroactively in anticipation of fee review; and

d. Whether the Fee Application reflects actual work performed or a curated presentation of that work.

83. White & Case's overbreadth and burden objections are equally defective. These requests are narrowly limited to a 111-day engagement and seek discrete categories of information maintained in the ordinary course of business within White & Case's own billing system. Identifying the system used and producing associated metadata or audit trails is not a document-intensive exercise, it is an inquiry into information that law firms typically maintain as part of their standard billing practices.

84. Critically, White & Case admits it has not conducted any search or inquiry. Without investigating how its own billing system functions or what data it maintains, it has no factual basis to claim burden, cost, or disproportionality. Such unsupported assertions violate Rule 26(g) and

should be disregarded.

85. White & Case's privilege objections are likewise improper. The information sought is administrative in nature. It does not reveal client communications, legal advice, or litigation strategy. To the extent any responsive material contains embedded privileged content, White & Case may redact that content and provide a privilege log. That is not a basis to refuse production altogether.

86. The proportionality of these requests is beyond dispute. White & Case seeks more than $14 million in purported fees and expenses. RFP Nos. 15 and 16 seek objective, system-generated evidence and basic foundational information necessary to test whether the underlying billing records are accurate and reliable. The minimal burden associated with producing this information is vastly outweighed by its importance.

87. White & Case's refusal to provide even this threshold level of transparency underscores its broader position that its billing practices are not subject to scrutiny. That position is contrary to the Federal Rules and the standards governing fee applications under § 330. The objections to RFP Nos. 15 and 16 should be overruled and full responses compelled.

WHEREFORE, ModivCare respectfully requests that the Court strike the objections outlined above, compel White & Case to produce all responsive documents, and grant such other and further relief, at law or in equity, to which ModivCare may be justly entitled.

Dated: April 3, 2026

Respectfully submitted,

By: */s/ Miriam Goott*
Miriam T. Goott
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SBN 24048846
COUNSEL FOR

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CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the Motion to Compel was served upon White & Case LLP, via email to the following individuals on April 3, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

By: */s/ Miriam T. Goott*
Miriam T. Goott

CERTIFICATE OF CONFERENCE

I, Miriam T. Goott, certify that on April 3, 2026, I conferred with Mr. Zakia and Ms. Chase, attorneys at White & Case, regarding their objections and responses to the Requests for Production. White & Case has taken the position that no documents will be produced without a Court order. I notified them that I would be filing this Motion to Compel, and they oppose the relief requested.

By: */s/ Miriam T. Goott*
Miriam T. Goott

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

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

WHITE & CASE LLP'S REPLY IN SUPPORT OF ITS FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases of the debtors and debtors in possession (the "Debtors" and after the Effective Date, collectively, the "Reorganized Debtors"), respectfully submits this reply ("Reply") in further support of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the "W&C Fee Application") and in response to the Reorganized Debtors' *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (the "Objection").[2]

PRELIMINARY STATEMENT

1. As this Court has already seen, these chapter 11 cases were the result of a failed liability management transaction completed just six months before the filing, through which the

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the W&C Fee Application.

Debtors' secured creditors, led by the Consenting Creditors,[3] obtained security over substantially all of the Debtors' assets. Whether or not this uptier transaction had any realistic hope of avoiding chapter 11, once it failed, the unmistakable and oft-stated goal of the newly secured lender group was to take the keys to the company as quickly and inexpensively as possible. Their challenge was that the Bankruptcy Code creates procedural safeguards that must be respected in a chapter 11 case, even if a secured creditor group finds those requirements inconvenient, inefficient, or expensive.

2. The existence of an official committee to represent the interests of all unsecured creditors, especially in a case like this with millions in funded unsecured debt and thousands of trade vendors, is one such fundamental safeguard. And, once the Committee was appointed and represented, the process run in these chapter 11 cases worked exactly as the Bankruptcy Code envisions (and Congress intended). The Consenting Creditors and the Debtors had one view of where enterprise value broke. Under their view, unsecured creditors were out of the money and were legally entitled to nothing. Not surprisingly, the Committee, as an estate fiduciary specifically charged with advocating for the interests of unsecured creditors, developed a different view. And because the Debtors' Plan did not include any market test to set an objective view of value—a direct result of the strategy chosen by the Plan supporters—the question of where enterprise value broke had to be presented to this Court through a classic battle of the experts. This

[3] "Consenting Creditors" refers to Q Global Advisors, LLC, HG Vora Capital Management, LLC, Redwood Capital Management, LLC, TCW Investment Management Company LLC, Metropolitan West Asset Management, LLC and TCW Asset Management Company LLC. The Consenting Creditors were represented by Paul Hastings LLP ("Paul Hastings") and included all entities listed in Exhibit A to the *Verified Statement Pursuant to Bankruptcy Rule 2019* [Docket No. 791]. The Consenting Creditors became the largest shareholders of the Reorganized Debtors as they had the right to appoint the Reorganized Debtors' board of directors. *See Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 725], Ex. C-1.

is standard practice in complex chapter 11 cases, and one that all parties understood would be expensive.

3. At the Debtors' request, this Court approved a fast but fair process in which both sides had the opportunity to take discovery and make their case at a five-day confirmation hearing. At the conclusion of the confirmation hearing, the Court found that the Committee's valuation expert was "credible" and that his approach was "valid." The Court also stated that it was "very happy with the level of the quality of the briefs [and] the quality of the arguments." But, this Court ultimately ruled for the Debtors and Consenting Creditors and confirmed the Plan.

4. None of this is remarkable. What is remarkable and, as far as we can tell, unprecedented, is that post-emergence, the Reorganized Debtors (now controlled by the Consenting Creditors) have taken the position that the Committee's professionals, whose retentions were approved by this Court without objection, should be paid ***nothing*** for their work.[4] The Objection, together with the overbroad discovery served on White & Case,[5] is a transparent and vindictive attempt to force the Committee professionals to incur economic pain in order to be paid for their service to the estates.

5. This Court should reject this effort. But before we delve into the many particularized reasons as to why the Objection fails, it bears noting who filed the pleading—the Reorganized Debtors, ***not*** the Consenting Creditors. The Consenting Creditors' decision as controlling shareholder to cause the Reorganized Debtors to hire their former counsel and to object was presumably done to fund this fee fight out of their new portfolio company.[6] That strategic

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[4] The Reorganized Debtors have also objected to the fees and expenses incurred by the Committee's financial advisor, AlixPartners, LLP ("AlixPartners"), further evidencing the retaliatory nature of their fee objections. *See Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351].

[5] The Reorganized Debtors' document requests are attached as **Exhibit A**.

[6] *See infra* n.8.

decision has one key practical consequence here: everything the Debtors did (or did not do) in *these cases* is, one way or another, binding on the only objecting party before this Court.[7] In that regard, the sole objector—the Reorganized Debtors—dictated the scope and extent of the fight and never once protested the Committee's staffing or spend for that fight as laid out in weekly budgets provided to them by the Committee. Nor could the Debtors protest because, as explained below, the Debtors were voluntarily paying significantly more to their own professionals to support their efforts to secure confirmation, all without comment, much less objection.

6. Turning back to the substantive objections framed in the pending matter, White & Case respectfully requests that this Court bifurcate its consideration of the Objection and first consider the Reorganized Debtors' arguments on the law and the already extensive evidentiary record developed in *these cases*, without any additional discovery (which the Objection explicitly points out will be uncompensable under the Bankruptcy Code).[8] The core of the Reorganized Debtors' argument is that the Committee's counsel should be paid nothing because they advanced a frivolous litigation position as part of some alleged extortion threat to force the estates to pay unnecessary professional fees. This Court can and should dispose of this without any additional factual record. ***First***, the Objection's reliance on the so-called "extortionist threat" represents a clear violation of Federal Rule of Evidence 408 that this Court should not permit. Putting aside the fact that the cost of defense is a legitimate consideration that is (and should be) discussed in

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[7] Pursuant to the Plan, the "rights, benefits, and obligations" from the Plan are binding on any successor of the Debtors. *See* Plan, Art. XII, 10.1, 12.15.

[8] Given the Court's prior rulings, the absence of any support for the proposition that the entirety of the Committee's advisor fees should be disallowed or subordinated, the inflammatory and deliberate mischaracterization and disclosure of statements made during privileged settlement discussions, and the fuzzy and misleading math contained therein raise the issue of potential sanctions on account of the Objection. *See Moser v. Bret Harte Union High Sch. Dist.*, 366 F. Supp. 2d 944, 950 (E.D. Cal. 2005) (imposing sanctions on attorneys for submitting pleadings and objections for improper purposes). Moreover, it is unclear whether the fact that the Reorganized Debtors filed the Objection would in this situation insulate the Consenting Creditors from sanctions, especially considering that counsel for the Reorganized Debtors appeared earlier in these cases on behalf of the Consenting Creditors. *See* [Docket No. 753]. If the matter proceeds to discovery, this will all have to be fully explored.

every settlement negotiation, this is exactly why the law does not allow the admission of settlement discussions as evidence. If discovery is allowed, it would need to include all parties and include the full context of these negotiations, including:

a) the unreasonable "settlement offers" the Committee was responding to;

b) the written and oral statements made by Latham (Debtors' counsel) and Paul Hastings (Consenting Creditors' counsel) concerning the Consenting Creditors' settlement proposals, their approach to *these cases* and their treatment of professionals;

c) the written and oral statements of the Consenting Creditors made directly to members of the Committee; and

d) the Debtors' own attempts to broker a deal.

7. While this expensive and expansive exercise would debunk the absurd allegations of wrongdoing in the Objection, it is unnecessary because none of that back-and-forth should be considered. Rule 408 shields such discussions, and that rule should be respected for all parties.

8. ***Second***, the unstated premise of the Objection's extraordinary position—that White & Case should be paid nothing—seems to be that White & Case incurred these fees in support of purportedly frivolous positions taken before the Court. This contention can likewise be disposed of based on the existing record of those contested matters. The Court already presided over all of the disputes in *these cases*. There is no need for an additional trial to reopen contested matters, in effect, to award sanctions not sought on the first instances. In particular, because the entire confirmation fight turned on value, the fact that the Committee put forth credible opinions showing unsecured creditors to be in the money precludes any argument that White & Case's efforts to

contest the Plan were frivolous. If the Reorganized Debtors want to explain why that is not true, they do not need discovery to do so.

9. ***Finally***, the Objection's criticisms of White & Case's invoices can also be disposed of on the existing record without any discovery, as is the case with any final fee application. Among other things, this Court has already adjudicated the reasonableness of the Reorganized Debtors' counsel's own fees and expenses in this case, and Latham was litigating the same exact issues as White & Case on the same schedule. Latham's pre-confirmation fees were approved by this Court without objection from any party and, importantly, without a peep from the party paying them. A comparison of Latham's fees and expenses, which have already been approved as reasonable, to White & Case's fees and expenses, establishes that White & Case's fees and expenses are even more reasonable. In every area where the Reorganized Debtors now criticize, White & Case spent far less than the Reorganized Debtors' own counsel for the same task. To be clear, this is not a criticism of Latham or any of the other Debtor professionals. It is simply proof of the amount of work required in these cases. Like the Reorganized Debtors' own advisors, White & Case deserves to be paid for its work.

10. For all of these reasons, the Objection should be overruled.

ARGUMENT

I. This Court Should Bifurcate Consideration of the Objection

11. Courts have the sole discretion to bifurcate consideration of any claims or issues "[f]or convenience, to avoid prejudice, or to expedite and economize." *See* Fed. R. Civ. P. 42(b); *Conkling v. Turner*, 18 F.3d 1285, 1293 (5th Cir. 1994) ("[T]he decision to bifurcate is a matter within the sole discretion of the trial court."); *see also EEOC v. Lawler Foods, Inc.*, 128 F. Supp. 3d 972, 974 (S.D. Tex. 2015) (holding that bifurcating discovery was appropriate because it is "the best means to secure the just, speedy, and efficient resolution of this action"). This Court should

exercise its discretion and first consider the Reorganized Debtors' arguments on the law and the already extensive evidentiary record without any additional discovery. Aside from the alleged statements made during settlement negotiations—which are inadmissible and represent a clear violation of Rule 408 (as discussed below)—the Objection does not present any factual issues that warrant discovery.[9] *See In re Assadi*, 2025 WL 1576801, at *2 (5th Cir. June 4, 2025), *cert. denied sub nom. Assadi v. Osherow*, 2026 WL 79771 (U.S. Jan. 12, 2026) (noting that the fee objections "concern the legal conclusions the court should draw from the record" and holding that the objectors "fail[ed] to assert disputed factual issues that would benefit from 'testimony of witnesses' . . . ."). Courts in this District routinely find that time entries and fee applications are sufficient evidence to determine the reasonableness of attorney fees. *See In re Lawler*, 807 F.2d 1207, 1211-12 (5th Cir. 1987) (upholding the bankruptcy courts finding that "the time logs presented by the applicants with their application describe the services rendered by the applicants in sufficient detail and, together with the record of this case, adequately inform the Court as to the extent and quality of the applicants' services"); *Wells Fargo Bank, N.A. v. Jones*, 391 B.R. 577, 591 (E.D. La. 2008) ("[T]he Fifth Circuit has ruled that the submission of legal invoices is sufficient evidence to affirm a district court's fee award . . . . [T]he Court finds sufficient evidence

[9] Despite this, a week after filing the Objection, the Reorganized Debtors served White & Case with a set of sixteen formal document requests. *See* Ex. A. These requests seek extensive discovery, including "[a]ll deposition outlines" White & Case prepared in these chapter 11 cases, and "[a]ll Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application." *See* Ex. A at 4-7. White & Case served its responses and objections on April 2, 2026, attached as **Exhibit B**, which declined to produce documents "subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter." During a meet and confer on April 2, 2026, White & Case requested the Reorganized Debtors consent to bifurcating discovery such that the parties only pursue discovery if the Court deems it necessary to resolve the W&C Fee Application. The Reorganized Debtors rejected that proposal, confirmed their view that all 54 timekeepers should be document custodians, and noted their intent to file a motion to compel. Just prior to the filing of this Reply, the Reorganized Debtors filed *ModivCare Topco, LLC's Motion to Compel White & Case, LLP to Respond to Discovery Requests* [Docket No. 1409] (the "Motion to Compel"). White & Case will respond to the Motion to Compel separately.

of legal invoices, billing, and record keeping to uphold the Bankruptcy Court's award.") (citing *K3C Inc. v. Bank of Am., N.A.*, 204 F. App'x 455, 466-67 (5th Cir. 2006)); *see also Montalvo v. Tower Life Bldg.*, 426 F.2d 1135, 1150 (5th Cir. 1970) ("The rule that a trial court may award attorneys' fees without receiving evidence concerning the proper amount is not grounded in judicial arrogance. There is simply no good reason why a court should be required to subordinate its own expertise in the matter to that of others. A trial court has firsthand knowledge of the proceedings before it and is thus clearly qualified to place a value on (the attorney's) services without opinion evidence of an expert witness on the subject.") (internal quotations omitted). This Court can adjudicate White & Case's fees based on the record in these chapter 11 cases, including the W&C Fee Application, the Monthly Fee Statements, and the attached time entries.

12. Avoiding discovery into the parties' settlement discussions respects Rule 408 and will avoid an extensive, painful, and ultimately irrelevant discovery. If the Court were to consider the alleged "threats" made in the course of settlement discussions, it would need to consider the full scope of the entire settlement negotiation to put those statements into context. But every effort should be made to clear the underbrush first, particularly where fees spent in discovery may not be compensated. The only reason that the Reorganized Debtors would fight bifurcation here would be to ensure that the Committee's professionals had to spend time and resources that the Bankruptcy Code will not cover. And it is not just the Committee professionals' fees at issue—developing a full record would entail discovery of numerous other parties, including the Debtors, Latham, Paul Hastings, and the Consenting Creditors. This is not necessary to adjudicate the Objection. *See Associated Builders & Contractors of La., Inc. v. Orleans Par. Sch. Bd.*, 919 F.2d 374, 379 (5th Cir. 1990) ("A request for attorney's fees should not result in a second major litigation.").

II. The Reorganized Debtors' Accusations Regarding Settlement Negotiations Violate Federal Rule of Evidence 408 and Are Meritless

13. The centerpiece of the Reorganized Debtors' Objection is their mischaracterization of statements made by White & Case in a settlement meeting as amounting to a coercive "threat." Obj. ¶¶ 15-22. The Reorganized Debtors allege that White & Case demanded that the Consenting Creditors "pay $30 million to the unsecured class, or the estate professionals would generate $30 million in fees through litigation" and threatened to "bury the estate in professional fees" if the parties did not reach a settlement. *Id.* ¶¶ 9, 15-21. The Court should not permit the Reorganized Debtors to weaponize settlement discussions.

14. ***First***, Federal Rule of Evidence 408 prohibits the use of offers or statements made during compromise negotiations to prove or disprove the validity or amount of a disputed claim, or to impeach a party through a prior inconsistent statement or contradiction. *See* Fed. R. Evid. 408; *see also Lyondell Chem. Co. v. Occidental Chem. Corp.*, 608 F.3d 284, 299 (5th Cir. 2010) ("Effective dispute resolution requires frank and full discussion of relevant evidence. Making the content of such a discussion available for use in related litigation would invite the very situation that Rule 408 is designed to avoid."). Rule 408 cannot be evaded simply by relabeling a settlement communication as "coercive," "extortionate," made in "bad faith," or as evidence of fiduciary misconduct. *See Ramada Dev. Co. v. Rauch*, 644 F.2d 1097, 1106-07 (5th Cir. 1981) (affirming the trial court's refusal to permit the introduction of evidence prepared to facilitate settlement negotiations under Rule 408); *Blu-J, Inc. v. Kemper C.P.A. Grp.*, 916 F.2d 637, 642 (11th Cir. 1990) (rejecting use of settlement-related evidence because the evidence in question "was intended to be part of negotiations toward compromise").[10]

[10] The limited exceptions found in Rule 408(b) do not apply as the statements are not being used to prove a witness's bias or prejudice, negate a contention of undue delay, or prove an effort to obstruct a criminal investigation or prosecution. *See* Fed. R. Evid. 408.

15. The meeting referenced in the Objection was a settlement meeting conducted in the context of negotiating creditor recoveries under the Debtors' Plan. *See* Obj. ¶ 19 (confirming that the challenged communications occurred in the context of settlement demands over value distribution to unsecured creditors). The Reorganized Debtors violate Rule 408 by attempting to use a statement made during those negotiations as evidence of the invalidity of the positions taken by the Committee in the chapter 11 proceedings. *See Eid v. Saint-Gobain Abrasives, Inc.*, 377 F. App'x 438, 444 (6th Cir. 2010) ("[admitting settlement discussions] would also run contrary to the purposes of Rule 408, as it would invite undue caution in settlement negotiations, and would facilitate the admission of communications that contain puffing, posturing, and various irrelevancies.").

16. ***Second***, separate from the inadmissibility of settlement communications, the Reorganized Debtors' characterization of the statements in question is misleading. What the Reorganized Debtors now describe as an "ultimatum" was nothing more than a recognition of litigation reality: if the parties could not resolve the Committee's concerns consensually, the Committee would continue investigating, litigating, and incurring professional fees in fulfilling its duties to its creditor constituents until it was able to put its best foot forward. Far from being "extortionate," such a statement reflects the simple reality that a contested chapter 11 case will result in significantly higher professionals' fees than a non-contested case.

17. ***Third***, the circumstances further confirm that the Reorganized Debtors' decision to label ordinary settlement discussions as "extortion" is nothing more than a weak justification for their retaliatory Objection. The Reorganized Debtors claim that, as early as October 28, 2025, they knew that the Committee's "real strategy" was to "bury the estate in exponentially expanding professional fees." *See* Obj. ¶ 2. Yet, despite purportedly possessing this knowledge for months,

the Debtors never moved to curtail White & Case's engagement, sought to impose sanctions, or filed a motion, letter, or even a reservation of rights challenging the Committee's litigation positions as frivolous or sanctionable. On the contrary, the Debtors responded to White & Case's weekly DIP budget submissions with "thanks" and without objection. *See, e.g.*, Email Chain from White & Case to Debtors' Professionals, dated Oct. 8, 2025 (the "Budget Emails"), attached as **Exhibit C**. Moreover, as discussed further below, the Debtors never objected to any of White & Case's monthly fee statements or its interim fee applications. The Objection is the first time the Debtors or their successors have characterized the Committee's litigation strategy as "extortionate" or anything similar. Obj. ¶ 16.

18. ***Fourth***, the Reorganized Debtors unsurprisingly cite no authority for the proposition that referencing the reality of professional fee exposure is improper in the context of settlement negotiations. *See* Obj. *passim*. Settlements are favored in bankruptcy precisely because they avoid the cost and burden of continued litigation. *See In re Johns*, 667 B.R. 322, 324 (Bankr. N.D. Tex. 2025) ("Compromises are favored in bankruptcy as they minimize litigation costs and promote an efficient administration of the debtor's estate.") (internal quotations and citations omitted); *In re Hudson's Coffee, Inc.*, 2008 WL 4837285, at *2 (Bankr. D.N.J. Oct. 31, 2008) ("Settlements are favored in bankruptcy in order to minimize litigation costs and to expedite administration of the estate.") (internal citations omitted); *In re Mallows*, 344 B.R. 207, 216 (Bankr. D. Mass. 2006) ("Settlement agreements are especially desirable in bankruptcy cases as a means to avoid the litigation of claims which would otherwise be unduly costly and therefore detrimental to the bankruptcy estate."). The Reorganized Debtors cannot complain about the fact that litigation materially increased costs to the estate and at the same time argue that it was somehow improper for the Committee's counsel to raise this obvious reality as a factor to consider

in setting any baseline recovery for unsecured creditors during settlement discussions. Obj. ¶¶ 9-10, 18, 21.

19. ***Finally,*** underlying the Reorganized Debtors' entire argument is the false premise that the Committee's litigation position was frivolous. *See* Obj. ¶¶ 15-22. The Court already has more than sufficient evidence to dispose of this baseless allegation. The Court presided over this entire case, culminating with a five-day valuation trial. The Court heard and considered the evidence on which the Committee's valuation position was based, primarily the expert opinion work of two highly qualified experts from AlixPartners. *See* Hr'g Tr. (Dec. 10, 2025), *passim*. There is no dispute that if these experts were correct, the Plan could not have been confirmed and unsecured creditors' recoveries would have to have been materially greater. *See Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 851]. While this Court ultimately did not accept the Committee's valuation position and confirmed the Plan, it did not find that the Committee's position was frivolous. Instead, it found that the Committee's valuation expert was "credible" and that his approach was "valid." *See* Hr'g Tr. (Dec. 12, 2025), at 8:21-24, 9:7-11. The Debtors' own expert witness agreed. *See* Zul Jamal Dep. Tr. (Nov. 20, 2025), at 28:9-13, relevant excerpts attached as **Exhibit D** ("Q: I'll get to this later, but in your view, do you view either report as having been prepared in bad faith? . . . A. Bad faith? I don't think so."). This Court also recognized everyone's "professionalism" and stated that he was "very, very happy with the level of the quality of the briefs, the quality of the arguments, and [ ] commend[ed] everybody for in a very, very short period of time being able to do that." Hr'g Tr.

(Dec. 12, 2025), at 4:24-5:4. In the face of this record and this Court's prior findings, there is no basis to contend that the Committee's litigation position was frivolous.[11] *See* Obj. ¶¶ 62-76.

III. White & Case's Fees and Expenses Are Reasonable Under Section 330 of the Bankruptcy Code

20. The Objection also argues that White & Case's rates and practices were excessive and divorced from what the market demands for complex chapter 11 representation. *See* Obj. *passim*. They were not. The W&C Fee Application, detailing White & Case's fees and expenses, readily meets the standards of section 330 and applicable Fifth Circuit case law for compensation for services rendered on behalf of the Committee. *See* 11 U.S.C. § 330(a)(1)(A)-(a)(1)(B) (stating that a court may award a professional employed under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . [and] reimbursement for actual, necessary expenses"). As the Reorganized Debtors concede, under the Fifth Circuit's prospective "good gamble" standard articulated in *In re Woerner*, professional services are compensable if, at the time rendered, they were either necessary to the administration of the case or reasonably likely to benefit the estate "even when those gambles do not produce an identifiable, tangible, and material benefit." *See* 783 F.3d 266, 273-74, 276 (5th Cir. 2015) (internal citations and quotations omitted); *In re Cmty. Home Fin. Servs., Inc.*, 990 F.3d 422, 427 (5th Cir. 2021) ("In awarding fees, hindsight is irrelevant; retrospect is irrelevant; 'material benefit to the bankruptcy estate' is irrelevant. What matters is that, prospectively, the choice to pursue a course

[11] As the Reorganized Debtors recognize, their newly-concocted equitable subordination theory, premised on section 510(c) and the *Mobile Steel* framework, requires a showing of inequitable conduct, resulting in injury to creditors, and consistency with the provisions of the Bankruptcy Code. *In re Mobile Steel Co.*, 563 F.2d 692, 699 (5th Cir. 1977) (reversing the lower Court and holding that there was not sufficient evidence support finding that the officers and directors had engaged in inequitable conduct to warrant subordination of their claims). As discussed herein, the only conduct alleged—a lawyers's statement during settlement negotiations that professional fees would be substantial if no deal was reached—does not constitute inequitable conduct within the meaning of *Mobile Steel*. The Reorganized Debtors do not cite to any case where a court equitably subordinated a committee professional's fees for any reason, and this Court should decline the Reorganized Debtors' invitation to do so here, particularly in the absence of a required adversary proceeding. *See* Obj. ¶¶ 121-133.

of action was reasonable. . . . The district court was wrong to vacate the bankruptcy court award based on its own retrospective assessment of the propriety of the adversary proceedings.") (internal citations and quotations omitted). Courts in this District have noted that "once the applicant establishes the reasonableness of the fees, the objecting party has the burden of demonstrating what part of the application is unreasonable." *In re MLCJR, LLC*, No. 23-90324 (CML) (Bankr. S.D. Tex.), Hr'g Tr. (Sept. 25, 2024), [Docket No. 2259], at 7:22-24.

21. White & Case's rates, fees, and expenses are all consistent with the standards that govern fee allowance under section 330 of the Bankruptcy Code. When measured against those of the Debtors' own counsel and against the prevailing national market for large-case restructuring counsel, White & Case's compensation is reasonable for a case of this size and complexity. White & Case's rates, which were already approved by the Court when White & Case was retained, reflect the reality that chapter 11 cases like these involve great complexity, high stakes, and severe time pressures—all of which were manifestly present here. *See* Retention Order. The Reorganized Debtors have failed to satisfy their burden to show that White & Case's fees and expenses are unreasonable.

A. A Comparison to the Debtors' Counsels' Fee Applications Demonstrates the Reasonableness of White & Case's Fees

22. Without protest, the Reorganized Debtors paid equivalent (and sometimes higher) going-rate fees and expenses of their own attorneys—including for large teams sent to the confirmation hearing, case monitoring, fee application work, and travel and lodging expenses. *See* Latham Fee Application *passim*.[12] Having allowed the Court to approve those practices from their own counsel without objection and having used estate assets to pay those fees in full, the

[12] "Latham Fee Application" references the *First and Final Application of Latham & Watkins LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Co-Counsel to the Debtors for the Period of August 20, 2025 Through December 29, 2025* [Docket No. 1268].

Reorganized Debtors cannot credibly challenge identical, standard practices by the Committee's counsel as "unreasonable." *See* Obj. *passim*. Reasonableness under section 330 does not vary based on which side of the table the professional sits on.

i. White & Case's Fees are Comparable to the Debtors' Counsels' Fees

23. What the Reorganized Debtors paid their own counsel for the same or similar workstreams in this case proves the reasonableness of the Committee's counsel's fees.[13] The aggregate fees and expenses paid by the Reorganized Debtors to their counsel far exceeds that requested by White & Case. *Compare* W&C Fee Application at 2 (showing total fees and expenses of $14,193,990) *with* Latham Fee Application at 2 (showing total fees and expenses of $23,134,030); Quinn Fee Application at 2 (showing total amount of fees and expenses of $2,073,759); Hunton Fee Application at 2 (showing total fees and expenses of $1,510,952).[14] The table below compares (1) White & Case's fees in certain of the billing categories that the Reorganized Debtors have now contested are "unreasonable" with (2) Latham's fees for those same categories.

Workstream	W&C	Latham
DIP Financing	$917,755[15]	$1,559,541[16]

[13] White & Case was the Committee's sole counsel in the case. On the other hand, the Debtors retained Latham as principal bankruptcy co-counsel, Hunton Andrews Kurth LLP ("Hunton") as bankruptcy co-counsel, and Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn") as counsel to the Debtors' special committee. *See generally* Latham Fee Application; *Quinn Emanuel Urquhart & Sullivan, LLP's First and Final Application for the Payment of Compensation and the Reimbursement of Expenses for the Period September 1, 2025, Through December 29, 2025* [Docket No. 1273] (the "Quinn Fee Application"); *First and Final Application of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of August 20, 2025 Through December 29, 2025* [Docket No. 1269] (the "Hunton Fee Application").

[14] All specific dollar amounts discussed in this Reply are rounded down to the nearest whole dollar.

[15] The total amount is derived from billing category B11 (DIP Financing & Cash Collateral) plus certain of the related tasks in billing category B15 (Hearings & Court Matters). *See* W&C Fee Application, Ex. B; First Monthly Fee Statement, Ex. C; Second Monthly Fee Statement, Ex. C.

[16] The total amount is derived from the billing category "Financing and Cash Collateral" and certain of the related tasks in "Hearings." *See* Latham Fee Application, Ex. B, E. This amount does not take into account Latham's fees incurred prior to the Petition Date, which are most likely substantial.

Workstream	W&C	Latham
Firm's Retention Applications and Fee Statements	$184,752[17]	$252,046[18]
Meetings & Communications with Clients	$364,318[19]	$414,595[20]
Plan Confirmation	$3,227,845[21]	$3,737,509[22]

24. The Objection includes various charts with an alleged total amount of fees for various workstreams. *See, e.g.*, Obj. ¶ 72. White & Case has significant concerns that those amounts are not accurate as they do not fully align with the amounts in W&C Fee Application's respective billing categories. White & Case, therefore, is unable to meaningfully comment as to nearly any of the Objection's numerical characterizations. The Reorganized Debtors' failure to include any specific time entries or methodology on how the Reorganized Debtors reached such amounts is fatal. *See Castorena v. Mendoza*, 2011 WL 13315708, at *5 (S.D. Tex. Mar. 14, 2011) ("Generalized statements that time spent was unreasonable or unnecessary are not particularly helpful and not entitled to much weight.").

[17] The total amount is derived from billing category B20 (Professional Retention & Fees – W&C). *See* W&C Fee Application, Ex. B.

[18] The total amount is derived from the billing category "Fee and Retention Applications (LW)." *See* Latham Fee Application, Ex. B.

[19] The total amount is derived from billing category B08 (Committee Meetings & Communications). *See* W&C Fee Application, Ex. B.

[20] The total amount is derived from specific time entries from the following billing categories: "Assumption and Rejection of Leases and Contracts," "Business Operations/Strategic Planning," "Communications with Creditors Committee," "Compliance & Investigations," "Corporate Governance, Board, and Regulatory Matters," "Employee Benefits and Pensions," "Financing and Cash Collateral," "General Case Strategy," "Hearings," "Insurance," "Litigation," "Plan and Disclosure Statement/Confirmation/Implementation/Plan Supplement," "Securities Matters," and "Vendor and Customer Matters." *See* Latham Fee Application, Exs. B, E.

[21] The total amount is derived from billing category B13 (Exclusivity, Plan & Disclosure Statement) plus certain of the related tasks in B15 (Hearings & Court Matters) and B19 (Non-Working Travel). *See* W&C Fee Application, Ex. B; Fourth Monthly Fee Statement, Ex. C.

[22] The total amount is derived from the billing category "Plan and Disclosure Statement /Confirmation/Implementation/Plan Supplement" and certain of the related tasks in "Hearings" and "Non-Working Travel Time." *See* Latham Fee Application, Exs. B, E. This amount does not take into account Latham's fees incurred prior to the Petition Date, which are most likely substantial.

25. The Reorganized Debtors also generally allege that White & Case "overstaffed" the matter by having 54 timekeepers over 111 days. Obj. ¶ 48. In a chapter 11 case involving simultaneously contested DIP financing, Plan confirmation, investigation of potential claims and causes of action, discovery, and multiple contested hearings, the use of a full litigation and restructuring teams is not overstaffing—it is competent case management.[23] The Debtors' own counsel deployed more than double the number of team members (132 timekeepers) throughout the same period. *See* Latham Fee Application, Exs. A, E (93 timekeepers and 7 practice support staff);[24] Hunton Fee Application, Ex. A (17 timekeepers); Quinn Fee Application, Ex. C (15 timekeepers).

26. The Reorganized Debtors also complain about the fees of Mr. Greissman, a key senior restructuring partner in these cases. *See* Obj. ¶¶ 22, 36, 50, 74. For its part, Latham, had *four* senior partners who each billed significantly more than Mr. Greissman during the cases—Jamie Wine billed 622.8 hours for $1,500,625, Keith Simon billed 648.6 hours for $1,484,512, George Klidonas billed 789.1 hours for $1,608,645, and Elizabeth Marks billed 894.8 hours for $1,744,479. *See* Latham Fee Application, Ex. A. The Debtors and the Reorganized Debtors viewed these fees to be reasonable and this Court accepted that position, allowing them to pay their professionals. *See Final Order Allowing Compensation and Reimbursement of Expenses* [Docket No. 1344]. The same should be true for White & Case.

27. The Objection's generalized challenge to deposition attendance is contradicted by the practices of the Debtors' own professionals. *See* Obj. ¶¶ 36, 50, 74-75. A review of the

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[23] For instance, the Debtors and the Consenting Creditors produced documents after depositions began, necessitating a large team to simultaneously review documents and prepare for imminent depositions.

[24] Latham does not list its practice support staff in its timekeeper summary table, *see* Latham Fee Application, Ex. A, and instead treats their work as an "expense." *See* Latham Fee Application, Ex. E. A manual review of Latham's expense invoices reveals that seven practice support staff billed time to the matter. *See* Latham Fee Application, Ex. E.

appearances recorded in certain deposition transcripts show that Latham sent a minimum of five attorneys to each deposition and usually had eight or nine attend.[25] *See, e.g.*, Dep. Trs., Exs. B-F; *The Official Committee of Unsecured Creditors' Deposition Designations of Daniel B. Silvers* [Docket No. 1023] at Ex. A. The deposition of David Mounts Gonzales is illustrative. *See* Dep. Trs., Ex. B. The deposition transcript (and related time entries) for the first day of David Mounts Gonzales' deposition reflects that the Committee, as part of what the Reorganized Debtors assail as "overstaffed and duplicative efforts," had nine professionals attend in total, including the questioning attorney and financial professionals. *See id.*; Third Monthly Fee Statement, at 38; Alix Third Monthly Fee Statement,[26] at 44-45. This is in comparison to nine professionals from Latham, four from Quinn, one from Hunton, four from Moelis, and two from FTI, for a total of *twenty* Debtor professionals. *See* Dep. Trs., Ex. B, at 2-4. That same deposition transcript showed that the Consenting Creditors, who were legally aligned with the Debtors, sent an additional five attorneys from Paul Hastings. *See id.* at 3.

28. More specific comparisons also disprove the Reorganized Debtors' baseless criticism that White & Case had restructuring attorneys attend depositions. *See* Obj. ¶¶ 22, 50. This criticism is absurd and again disproven by the Debtors' own professionals. Three to four Latham partners, including restructuring partners, regularly attended depositions and billed for their time. *See, e.g.*, Dep. Trs., Exs. B-F. This included George Klidonas, a Latham restructuring partner, who attended all sixteen depositions and billed $170,742 for that work, and Keith Simon, a Latham restructuring partner, who attended fifteen depositions and billed $134,617 for that work.

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[25] "Deposition Transcripts" refers to *The Official Committee of Unsecured Creditors' Deposition Designations of David Mounts Gonzales, Heath Sampson, Barbara Gutierrez, and Scott A. Kern* [Docket Nos. 1019, 1020].

[26] "Alix Third Monthly Fee Statement" refers to *Third Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period From November 1, 2025 Through November 30, 2025* [Docket No. 1086].

See, e.g., *id.*; Latham Fee Application, Ex. E. Again, this is not a criticism of Messrs. Klidonas and Simon or any of the Debtors' professionals. It is simply proof that the work necessary in these cases, particularly given their lightning speed , required large teams to focus on multiple disciplines to stay on top of the workflow.

29. A comparison of the Debtors' counsels' and the Committee's counsels' staffing for hearings yields the same conclusion. Latham's time entries show that seventeen timekeepers (including five partners) billed for attending the DIP hearing, *see* Latham Fee Application, at 142-43, and that at least nineteen timekeepers billed for attending the first three days of the confirmation hearing, *see* Latham Fee Application, at 669-72. This is in comparison to the nine White & Case timekeepers who billed for attending the DIP hearing, *see* First Monthly Fee Statement, at 55, and the eight White & Case timekeepers who billed for attending the confirmation hearing, *see* Fourth Monthly Fee Statement, at 34-38. This objectively demonstrates that White & Case's lower attendance at depositions and hearings was not "overstaffing" or "duplicative," but rather consistent with what the Debtors themselves understood was reasonable and necessary for a case of this complexity. Obj. ¶ 49.

30. Perhaps most tellingly, White & Case billed significantly less than the Debtors' counsel for trial preparation and the confirmation trial itself. From December 1 (one week before trial started) through December 11 (the last day of the evidentiary portion of trial), White & Case, using 30 timekeepers, billed $2,780,850 in fees to billing categories associated with trial preparation and trial. *See* Fourth Monthly Fee Statement, Ex. C.[27] Over this same period, Latham, Quinn, and Hunton, using 60 timekeepers, billed $4,111,315 in fees to similar billing categories.

[27] The total amount is derived from billing categories B13 (Exclusivity, Plan & Disclosure Statement), B15 (Hearings & Court Matters), and B16 (Investigation of Causes of Action) from December 1 to December 11, 2025.

See Latham Fee Application, at 620-733;[28] Quinn Fee Application, at 102-107;[29] Hunton Fee Application, at 151-173.[30] This is nearly 34% more than White & Case who was representing the sole party on the other side of the courtroom aisle. This comparison does not even take into account that the Debtors' positions at trial were supported by the Consenting Creditors' own separate counsel, Paul Hastings, whose trial fees were not disclosed. In light of this comparison, the Reorganized Debtors' assertion that White & Case's fees are the product of "systemic overbilling" is neither genuine nor credible. *See* Obj. ¶ 35.

ii. White & Case's Travel Expenses Incurred for Confirmation Mirror those Incurred by the Debtors' Counsel

31. The Reorganized Debtors also object to the "entirety" of White & Case's expenses, ostensibly contending that White & Case should go significantly out of pocket for its work in these cases. *See* Obj. ¶ 86. The Objection, when it comes to even attempting to satisfy the heavy burden of such an egregious ask, singles out certain White & Case attorneys' hotel stays at the Four Seasons in Houston and the Ritz-Carlton in Boston, and a group dinner during trial, as its only evidence of unreasonable "extravagance." *Id.* ¶¶ 2, 87.[31] But, again, a comparison with the Debtors' counsel's expenses, which this Court approved and the Reorganized Debtors paid, shows that White & Case's expenses are well within the bounds of reasonableness. ***First***, various Latham attorneys also stayed at the Four Seasons in Houston. *See* Latham Fee Application, at 597, 605-06, 612-14. In total, Latham's hotel expenses are directly comparable to those expenses now

[28] The total amount is derived from billing categories "Hearings," "Litigation," and "Plan and Disclosure Statement/Confirmation/Implementation/Plan Supplement" from December 1 to December 11, 2025.

[29] The total amount is derived from billing categories project categories 03 (Plan/Disclosure Statement) and 04 (Investigation) from December 1 to December 11, 2025.

[30] The total amount is derived from billing categories B110 (Case Administration) and B320 (Plan and Disclosure Statement, including Business Plan) from December 1 to December 11, 2025.

[31] The Reorganized Debtors did not find that payment of a $366 hair dryer for their own counsel was "extravagant." *See* Latham Fee Application, at 586.

challenged by the Reorganized Debtors for the Committee. *Compare* Latham Fee Application, Ex. C (showing Latham spent $76,625 in hotel accommodations) *with* W&C Fee Application, Ex. E (showing White & Case spent $47,561 in hotel accommodations). ***Second***, the Reorganized Debtors allege that "one attorney billed $1,877 for a single dinner," failing to mention that this dinner was for the entire trial team on the day the evidentiary portion of the trial ended. *See* Obj. ¶ 88. And in fact, Latham billed $1,239 for a dinner at a restaurant on December 4 or 8, 2025 and had at least three other dinners for over $800 each. *See* Latham Fee Application at 591-92. This is not unreasonable; it just shows the reality of meal expenses during a trial in Houston. *Compare* Latham Fee Application, Ex. C (showing that Latham spent $25,277 in various meal types) *with* W&C Fee Application, Ex. E (showing that White & Case spent $13,562 in various meal types). On the record that already exists, White & Case's expenses were not just "actual and necessary," they were proportionate to those incurred by the objecting party's own counsel. *See* 11 U.S.C. §330(a)(1)(B). This Court should reject the Reorganized Debtors' request to apply a selective standard of reasonableness to the Committee's counsel's expenses.

B. The Committee Benefitted the Debtors' Estates

32. The Reorganized Debtors object to literally "each and every time entry and expense" of White & Case, which the Reorganized Debtors say was all "the product of a coercive threat"– *i.e.*, taking issue with every single action that White & Case took in furtherance of the unsecured creditors' statutory duties. Obj. ¶¶ 56-83. As explained above, the Reorganized Debtors are apparently of the view that it was unreasonable for the Committee's counsel to perform any work at all.[32] The only conceivable bases for such a ridiculous position would be if (1) everything

[32] Despite these post-hoc statements, the Debtors' own expert and investment banker found that the Committee's actions, including forming views on the distributable value under a plan and a debtor's business plan, objecting to debtor-in-possession financing, and serving discovery, were not uncommon actions for unsecured creditors' committees. *See* Jamal Dep. Tr. (Nov. 20, 2025), at 20:15-21:9, 22:2-34:19, attached as Ex. D.

the Committee was doing was frivolous, which as explained above, was certainly not the case, or (2) these cases did not warrant a Committee with counsel. This Court has already rejected the latter contention, stating "the Committee fees will be what the Committee fees are, and if they're reasonable, they will be -- they will be awarded. And if you want to confirm a plan, they will have to be paid . . . ." *See* Hr'g Tr. (Oct. 3, 2025) at 9:25-10:3.[33] The Court can, and should, dispose of this argument based on the existing record and its prior findings. *See supra* ¶¶ 11-12.

C. The Prevailing Market Rate Under Section 330 Is the National Market for Complex Reorganization Counsel

33. In an attempt to have this Court disallow a wide swath of legal fees without going line-by-line through the W&C Fee Application, the Reorganized Debtors argue that White & Case's fees are off-market. *See* Obj. ¶¶ 30-32. The controlling "community" for assessing prevailing market rates under section 330 in a case of this complexity is not the geographically local market (*i.e.*, Houston or the Southern District of Texas), it is the national bankruptcy market for large, sophisticated chapter 11 cases. *See In re Fieldwood Energy LLC*, 2024 WL 4713011, at *4 (Bankr. S.D. Tex. Nov. 7, 2024) ("Reasonable hourly rates 'are to be calculated according to the prevailing market rates in the relevant community.'") (quoting *McClain v. Lufkin Indus., Inc.*, 649 F.3d 374 (5th Cir. 2011)); *In re ASARCO LLC,* 2011 WL 2975691, at *13 (Bankr. S.D. Tex. July 20, 2011) (holding that the factors under section 330 "must also include a determination of the 'relevant market' in which these fees are determined and the fees billed compared"). As disclosed in the Retention Application, White & Case is a nationally recognized participant in representing stakeholders in chapter 11 cases and its rates are consistent with those of peer firms, including Latham. *See* Retention Application ¶ 8; Latham Fee Application, Ex. D (showing

[33] The Court also explained "to the extent that everyone wants a confirmed plan . . . the reasonable administrative expenses are going to have to be paid . . . I'm not going to confirm a plan without admin claims being paid, and I'm not going to cap the fees of the Committee. . . ." *See* Hr'g Tr. (Oct. 3, 2025), at 9:14-25.

comparable and in several instances higher rates);[34] *see, e.g.*, *In re LifeScan Global Corp.*, Case No. 25-90259 (ARP) (Bankr. S.D. Tex. Jan. 6, 2026), [Docket No. 653], Ex. C (showing comparable 2025 hourly billing rates), *approved in full* [Docket No. 683]; *In re Wellpath Holdings, Inc.*, Case No. 24-90533 (ARP) (Bankr. S.D. Tex. June 6, 2025), [Docket No. 2956], Ex. C (showing comparable 2025 hourly billing rates), *approved in full* [Docket No. 3191]; *In re NorthVolt AB*, Case No. 24-90577 (ARP) (Bankr. S.D. Tex. May 1, 2025), [Docket No. 10], Ex. E (showing comparable 2025 hourly billing rates), *approved in full* [Docket No. 22].

34. In any event, this Court has already approved White & Case's billing rates upon retention through its unopposed Retention Application. *See* Retention Order. To the extent the Reorganized Debtors' arguments rest on the premise that those rates were unreasonable, those arguments are barred by the Court's prior approval. *See id*. The Court pre-approved White & Case's hourly rates under section 328(a),[35] which provides that any later inquiry into the reasonableness of fees at the conclusion of employment is limited to whether the "terms and conditions prove to have been improvident in light of developments not capable of being anticipated at the time of the fixing of such terms and conditions." 11 U.S.C. § 328(a); *see also Feilitech*, 2023 WL 8855666, at *14 (citing *In re ASARCO, L.L.C.*, 702 F.3d 250 (5th Cir. 2012)) ("[Case law] makes clear that § 328 prohibits the award of fees *above* the amount previously agreed absent circumstances not capable of being anticipated. Logic dictates that § 328 does not permit this Court to *reduce* agreed upon hourly rates under similar circumstances."). The Objection's

[34] While complaining about the disclosed rates of White & Case's senior partners, four partners from Latham have even higher hourly rates—*e.g.*, Joseph Kronsnoble, Joel Trotter, Michele Anderson's rates are all $2,650 per hour and Ray Schrock's rate is $2,550 per hour.

[35] Both the Retention Application and the entered Retention Order explicitly refer to approval of White & Case's employment under section 328(a) of the Bankruptcy Code. *See* Retention Application, at 1, ¶¶ 1, 3, 11, 17; Retention Order, at 1-2, ¶ 1; *see also In re Feilitech US LLC*, 2023 WL 8855666, at *11 (Bankr. N.D. Miss. Dec. 21, 2023) ("[B]oth the Employment Applications and the Employment Orders explicitly refer to approval of the Applicants' employment under § 328.").

failure to contend at all with the governing "improvidence" standard forecloses any belated complaint about White & Case's hourly rate.

D. This Court Should Reject the Reorganized Debtors' Flawed Blended Rate Comparison

35. The Reorganized Debtors blended-rate argument—characterizing White & Case's blended rates here as evidence of a "bankruptcy surcharge"—misunderstands how blended rates are calculated and applies a methodology that no court in this Circuit has adopted as grounds for categorical fee reduction. *See* Obj. ¶¶ 2, 30-32.[36] Their argument is flawed on two independent grounds. ***First***, the blended rate comparison is inherently distorted by the composition of the timekeeping pool. White & Case calculated its "Non-Bankruptcy Blended Rate" by dividing the total dollar amount billed to non-bankruptcy matters by all timekeepers in the applicable offices by the total number of hours billed to non-bankruptcy matters during the comparable period. Non-bankruptcy matters at a firm like White & Case encompass a broad range of work, including work that, by its nature, is comparatively weighted toward junior associates at lower rates, which dilutes the blended figure downward. The Committee engagement, by contrast (and aligned with both debtor engagement and committee engagements in large, complex commercial chapter 11 cases—especially those on expedited timelines), drew heavily on senior partners, a necessary reality given the compressed time frame insisted upon by the Debtors. A higher blended rate is the natural and expected result of a more senior-weighted, specialized team—not evidence of a surcharge. Indeed, Latham's own blended rate disclosures illustrate a similar difference between their firm-wide, non-restructuring work and the necessities of this complex, chapter 11 case. *Compare* Latham Fee

[36] Consistent with the Objections' numerous inaccuracies, the Objection in one sentence notes the White & Case's blended paraprofessional rates for this matter of $500 and non-bankruptcy matters at $462, and then in the next sentence refers to "a 10% to 22%" differential. Obj. ¶¶ 32-33. The difference for paraprofessionals is only 8.2%.

Application, Ex. D (showing that the aggregate blended rate was $1,426) *with* W&C Fee Application, Ex. F (showing that the aggregate blended rate was $1,414).[37]

36. ***Second***, the "bankruptcy premium" framing ignores what section 330 actually requires: "reasonable" compensation taking into account "the nature, the extent, and the value of such services." 11 U.S.C. § 330(a)(3). In applying this standard, the relevant question is whether the average rates billed are consistent with the customary market rate charged by comparably skilled practitioners in comparable non-bankruptcy matters. *See In re ASARCO, L.L.C.*, 751 F.3d 291, 301 (5th Cir. 2014) (holding that "there is no litmus test to determine the comparability of professional services in bankruptcy and other practice areas.") (citations omitted).

E. White & Case's Time Entries Comply with the U.S. Trustee Guidelines and Sufficiently Demonstrate the Reasonableness of the Work Performed

37. Eventually, the Reorganized Debtors make their way to actual criticisms of White & Case's time entries, but these objections also are misleading and without merit. *See, e.g.*, Obj. ¶¶ 41-47. ***First***, the Reorganized Debtors allege that White & Case's time entries were "vague" and amounted to "block billing." *Id.* ¶ 41. But the only specific time entry they point to shows the exact opposite. *Id.* ¶ 43. That example is of an attorney who billed 18.6 hours *on the day before trial began*. *Id.* ¶ 43. The Reorganized Debtors concede that this single entry lists "12 distinct tasks," including "drafting cross outlines, reviewing exhibits, reviewing liquidation research, drafting memos, and holding multiple calls." *Id.* ¶ 43. That is the opposite of block billing and "vague" time entries. The attorney specifically listed out each task and the amount of

[37] While the details of Paul Hastings' rates for representing the Consenting Creditors are unknown, Paul Hastings' blended rates for representing an unsecured creditors committee in a different case pending in this Court are even higher. *In re LifeScan Global Corp.*, Case No. 25-90259 (ARP) (Bankr. S.D. Tex. Jan. 6, 2026), [Docket No. 667], Ex. C (showing that the aggregate blended rate was $1,753).

time that each task took. *See* Fourth Monthly Fee Statement, Ex. C at 20.[38] Intensive single-day billing leading up to a contested confirmation trial simply reflects the demands of the cases. The reasonableness of such time entries is further evidenced by the Debtors' attorneys' time entries showing multiple 18-hour plus days. *See, e.g.*, Latham Fee Application at 468, 672, 689, 693, 707, 719 (showing attorneys billing in one day (i) 18.7 hours for four tasks, (ii) 19 hours for four tasks and traveling to Houston, (iii) 21.5 hours for two tasks, and (iv) 18.6 hours for seven tasks).

38. ***Second***, White & Case's time entries in the "Case Strategy" category are not vague. *See* Obj. ¶¶ 81-83. The Reorganized Debtors selectively copy and paste parts of time entries to allege that any time entry with the word "strategy" is vague and does not provide sufficient information for this Court to determine the reasonableness of such fees. *Id.* ¶¶ 81-83. They are wrong. Even the excerpts of the time entries cited in the Objection state when the call took place, who the call was with, what the call was about, and how long the call took. *See League of United Latin Am. Citizens # 4552 v. Roscoe Indep. Sch. Dist.*, 119 F.3d 1228, 1233 (5th Cir. 1997) (holding that in determining the reasonableness of fees, a court regularly focuses on whether the records contain the "date, the number of hours spent (calculated to a tenth of an hour), and a short but thorough description of the services rendered"); *see also*, *e.g.*, Fourth Monthly Fee Statement, Ex. C, at 3-5. Not disclosing attorney work-product and other privileged information about the Committee's strategy in public fee application filings does not make a time entry vague.[39]

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[38] The time entry stated: "Revise C. Shandler cross-examination outline for confirmation hearing (2.2); review exhibits re: same (1.3); confer with C. Shandler re: same (0.8); review research re: liquidation analysis (1.9); conduct legal research re: same (1.6); draft memo re: same (1.1); prepare for confirmation hearing trial (2.2); review exhibits for confirmation trial (2.6); confer with A. Chase and E. Smith re: same (0.7); call with W&C re: standing motion reply (0.9); conduct legal research re: colorability for standing motion reply (0.4); emails with W&C re: workstreams for standing motion reply (0.9); review bench memos for confirmation hearing (1.4); confer with J. Zakia re: bench memos (0.4); email with Alix re: confirmation trial (0.2)."

[39] Further, the alleged "admitted category overlap" is misleading, as this disclosure was merely to indicate that certain of the attorney's specific time entries fell into various billing categories. *See* Obj. ¶¶ 44-47. This is a technical clarification for purposes of the W&C Fee Application, but does not mean that any time entry is duplicative, considered "block billing" or "gang-billing." *Id.* ¶¶ 44-47.

39. Ultimately, the Reorganized Debtors have failed to identify a single time entry that is not compensable or that does not comply with the U.S. Trustee's guidelines. Throughout these chapter 11 cases, White & Case has filed thousands of pages of detailed time entries and has been consistently transparent in its fee applications, providing the information and detail necessary for a presumption of reasonableness. *See generally* W&C Fee Application; Interim Fee Application; First Monthly Fee Statement; Second Monthly Fee Statement, Third Monthly Fee Statement; Fourth Monthly Fee Statement. White & Case has satisfied the standards for final allowance and payment of its fees.

IV. The Debtors Never Objected to, or Reserved Rights Regarding White & Case's Rates, Budget, or Fees

40. While the Reorganized Debtors now seek to deny all fees, during the chapter 11 cases, the Debtors sat silent through every one of White & Case's monthly fee statements and interim fee application.[40] They never objected, filed a reservation of rights, or otherwise complained to the Court that such fees were in any way improper. And, contrary to the Reorganized Debtors' assertions, White & Case provided the Debtors' professionals with an overall budget at the beginning of the cases—approximately $18 million for a contested case. *See* Budget Emails. Ultimately, White & Case billed approximately $5 million lower than the budgeted amount. *See* W&C Fee Application; Budget Emails. The Committee also sent the Debtors weekly budgets and estimates throughout the chapter 11 cases. *See, e.g.*, Budget Emails. The Debtors never protested or objected to the Committee's initial budget or the weekly budget estimates. Rather, the Debtors agreed to adjust their DIP budget for professional fees based on the contested nature of the chapter 11 cases. This Objection, raised for the first time at the final fee

[40] No other party in interest has objected to White & Case's fees, including the U.S. Trustee, who is the statutory watchdog for professional fee matters in chapter 11 cases. *See* U.S.C. s 586(a)(3)(A).

stage, is inconsistent with the Debtors' conduct throughout the chapter 11 cases. *See supra* ¶¶ 5, 17.

RESERVATION OF RIGHTS

41. White & Case expressly reserves all of their rights, claims, defenses, and remedies, including, without limitation, the right to amend, modify, or supplement this Reply, to seek discovery, to introduce evidence and to raise additional arguments at any hearing to consider the W&C Fee Application.

CONCLUSION

WHEREFORE, for the reasons set forth in this Reply and in the W&C Fee Application, White & Case requests that this Court (i) overrule the Objection, and (ii) enter an order granting final allowance and payment of compensation for professional services as provided in the proposed order attached to the W&C Fee Application.

[*Remainder of Page Intentionally Left Blank*]

April 3, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on April 3, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster

EXHIBIT A

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

MODIVCARE TOPCO, LLC'S REQUESTS FOR PRODUCTION TO WHITE & CASE, LLP

To: White & Case, LLP via U.S. mail to 1221 Avenue of the Americas, New York, New York 10020, and via email to the following individuals on March 12, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

Pursuant to FED. R. CIV. P. 34, ModivCare Topco, LLC (**"ModivCare"**) serves this Requests for Production to White & Case, LLP (**"W&C"**). W&C's responses shall be served on ModivCare through its attorneys, Walker & Patterson, P.C. c/o Miriam T. Goott, by electronic transmission at mgoott@walkerandpatterson.com, within thirty (30) days of service of these Requests.

DEFINITIONS AND INSTRUCTIONS

For purposes of these Request for Production, the following definitions apply:

1. **"Billing Practices"** means any policies, directives, instructions, guidance, goals, targets, expectations, or commentary relating to the recording of time, the volume of hours billed or to be billed, the staffing of matters or tasks, the number of timekeepers assigned to any task or matter, the rates charged, voluntary reductions or write downs, or the review, revision, or editing of time entries.

2. **"Communication"** means any email, memorandum, instant message, text message, Slack message, Microsoft Teams message, or other written or electronic correspondence. Nothing in this definition is intended to require the production of communications protected by the attorney-client privilege or attorney work-product doctrine concerning legal strategy or mental impressions regarding the substantive legal issues in the Engagement.

3. **"Engagement"** means White & Case's retention as counsel to the Official Committee of Unsecured Creditors in In re ModivCare Inc., Case No. 25-90309, filed in the United States Bankruptcy Court for the Southern District of Texas.

4. **"Final Fee Application"** means the White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period September 9, 2025 through December 29, 2025 filed by White & Case at ECF No. 1290.

5. **"Objection"** means the objection filed at ECF No. 1354 to White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period September 9, 2025 through December 29, 2025 filed by White & Case at ECF No. 1290.

6. **"White & Case Personnel"** means any partner, associate, counsel, staff attorney, paraprofessional, legal assistant, project manager, litigation specialist, billing coordinator, finance department employee, or any other person employed by or affiliated with White & Case LLP who performed any function in connection with the Engagement.

7. **"Deposition Materials"** means any outline, script, question list, topic list, memorandum, template, or other preparatory document created, drafted, revised, or used by any White & Case Personnel in connection with the preparation for or conduct of any deposition taken during the

Engagement, including any subsequent iteration, revision, or adaptation of any such document for use in a later deposition.

INSTRUCTIONS

To the extent White & Case withholds any responsive document on the basis of attorney client privilege or work product protection, White & Case shall produce a privilege log identifying each withheld document by date, author, recipient, subject matter, and the specific privilege asserted.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All Communications among White & Case Personnel concerning Billing Practices in connection with the Engagement, including but not limited to any communications regarding the volume of hours to be billed to the Engagement, any targets or expectations regarding fees to be generated from the Engagement, or any instructions or guidance regarding increasing or decreasing the amount of time recorded by any timekeeper on any task or matter.

REQUEST NO. 2:

All Communications among White & Case Personnel concerning the staffing of the Engagement, including but not limited to any communications regarding the number of timekeepers to be assigned to any hearing, deposition, committee call, drafting task, or document review project, or any communications regarding whether particular timekeepers should bill time to the Engagement or to any particular task within the Engagement.

REQUEST NO. 3:

All Communications among White & Case Personnel concerning the review, revision, editing, reduction, or write down of time entries recorded in connection with the Engagement, including but not limited to any communications regarding the "voluntary reductions" referenced in the Final Fee Application, any communications identifying specific entries to be reduced or written off, any communications regarding whether particular time entry descriptions should be revised before submission, and any communications regarding the criteria applied in determining which entries to reduce.

REQUEST NO. 4:

All Communications among White & Case Personnel concerning the $30 million demand referenced in the Objection, to the extent such communications relate to Billing Practices or the relationship between the demand and the anticipated or actual level of professional fees in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions.

REQUEST NO. 5:

All orders, opinions, rulings, or decisions issued by any bankruptcy court in any case in which White & Case LLP served as counsel, that reduced, denied, or disallowed fees or expenses sought by White & Case on the basis of overstaffing, excessive billing, duplicative services, block billing, vague or insufficient time entries, unnecessary litigation, scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate, or any other billing practice or litigation conduct that resulted in a judicial finding that fees requested by White & Case were unreasonable, unnecessary, or otherwise not compensable.

REQUEST NO. 6:

All pleading filed in any bankruptcy court in any case in which White & Case LLP served as counsel that alleged or asserted that White & Case LLP: (a) overstaffed matters; (b) excessively billed; (c) duplicated services; (d) engaged in block billing; (e) submitted vague or insufficient time entries; (f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate.

REQUEST NO. 7:

All pleadings filed in any bankruptcy court in any case in which White & Case LLP served as counsel in which any party requested, sought, or argued for the reduction, denial, modification, or disallowance of any attorney's fees or costs requested by White & Case LLP, regardless of whether such request or objection was sustained, overruled, or otherwise resolved.

REQUEST NO. 8:

All Communications among White & Case Personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent such communications relate to Billing Practices, staffing decisions, or the volume of fees being generated in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions regarding the substantive

response to the Statement, but solely communications regarding whether and how the Statement should affect billing or staffing decisions.

REQUEST NO. 9:

All Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application, including but not limited to any communications regarding the assignment or reassignment of time entries to project codes or billing categories, any communications regarding the allocation of time entries across multiple project categories, any communications regarding the "overlap" between project categories that White & Case acknowledges in the Final Fee Application, any communications regarding which project code a particular time entry should be billed to or categorized under, any communications regarding the narrative descriptions included in the Final Fee Application, and any communications regarding how the work performed by White & Case Personnel should be presented, described, or organized in the Final Fee Application.

REQUEST NO. 10:

All deposition outlines prepared, drafted, revised, or used by any White & Case Personnel in connection with any deposition taken during the Engagement. White & Case may redact portions of any deposition outline reflecting attorney strategy, confidential client information, or other protected work product to address any privilege concerns.

REQUEST NO. 11:

All documents sufficient to show any internal budget, fee estimate, fee projection, or anticipated fee range prepared, drafted, or considered by White & Case LLP in connection with the Engagement, regardless of whether such budget, estimate, projection, or range was finalized, approved, or filed.

REQUEST NO. 12:

All Communications among White & Case Personnel concerning whether a budget, fee estimate, fee projection, or anticipated fee range should be prepared or filed in connection with the

Engagement, including any Communications discussing reasons for preparing, not preparing, filing, or not filing such a budget or estimate.

REQUEST NO. 13:

All Communications among White & Case Personnel concerning whether the professional fees incurred or anticipated to be incurred in connection with the Engagement were excessive, unusually high, disproportionate to the matters at issue, likely to draw objection, or otherwise at risk of reduction or disallowance by the Court.

REQUEST NO. 14:

All Communications among White & Case Personnel concerning the entry of time after the work was performed, including any Communications concerning delayed time entry, reconstruction of time entries, or instructions to enter time for prior dates.

REQUEST NO. 15:

All documents sufficient to show the date and time each time entry billed to the Engagement was created, entered into White & Case LLP's billing system, modified, or submitted for billing, including any audit logs, metadata, or system reports reflecting the creation, modification, and history of such entries.

REQUEST NO. 16:

All documents sufficient to identify the billing or timekeeping system used by White & Case LLP in connection with the Engagement,

Dated: March 12, 2026

Respectfully submitted,

By: */s/ Miriam Goott*
Miriam T. Goott
Attorney-in-charge
SBN 24048846
COUNSEL FOR MODIVCARE TOPCO, LLC

OF COUNSEL:
Walker & Patterson, P.C.
P.O. Box 61301
Houston, TX 77208
(713) 956-5577 (telephone)
mgoott@walkerandpatterson.com

CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the foregoing **Requests for Production** has been served upon White & Case LLP, via U.S. mail at 1221 Avenue of the Americas, New York, New York 10020, and via email to the following individuals on March 12, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

By: */s/ Miriam T. Goott*
Miriam T. Goott

EXHIBIT B

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)
Debtors.[1]	)	(Jointly Administered)

WHITE & CASE, LLP'S RESPONSES AND OBJECTIONS TO THE REORGANIZED DEBTORS' REQUESTS FOR PRODUCTION

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (the "**Federal Rules**"), made applicable to this matter by Rules 7026, 7034, and 9014 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), White & Case, LLP ("**White & Case**"), by and through its undersigned counsel, hereby responds and objects (the "**Responses and Objections**") to *ModivCare TopCo, LLC's Requests for Production to White & Case, LLP* (the "**Requests**," and each a "**Request**") served by the reorganized debtors of the above-captioned debtors and debtors in possession (the "**Reorganized Debtors**") on March 12, 2026.

GENERAL OBJECTIONS

The following general objections ("**General Objections**") apply to each definition ("**Definition**"), instruction ("**Instruction**"), and Request, and shall have the same force and effect as if fully set forth in the response to each individual Request. To the extent that White & Case responds to a Request, White & Case reserves all objections as to relevance, materiality, competence, confidentiality, propriety, privilege, and admissibility, as well as to any and all other

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

objections on any ground that would require or permit the exclusion of the response, or any portion of the response, if the response were offered into evidence. White & Case objects as follows:

1. White & Case objects to each Definition, Instruction, and Request to the extent they purport to impose different or broader requirements or obligations than those contained in the Federal Rules, the Bankruptcy Rules, the Local Rules of the United States District Court for the Southern District of Texas, the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas, or any other applicable law, rule, or order of this Court (collectively, the "**Rules**"). White & Case will construct and respond to the Requests in a manner consistent with White & Case's obligations under the Rules.

2. White & Case objects to the Requests to the extent that they purport to require White & Case to conduct anything beyond a reasonable search for readily accessible information relevant, probative, and proportional to the needs of assessing the relief sought in *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Dkt. No. 1290] (the "**W&C Fee Application**").

3. White & Case objects to the Requests to the extent that they are overbroad, unduly burdensome, cumulative, or duplicative, not proportional to the needs of the case, or designed to harass White & Case. White & Case objects to the Requests to the extent that they call for the production of "all" or "any" Documents pertaining to a subject on the grounds that such Requests are overly broad, unduly burdensome and not proportional to the needs of the case so as to make it impossible to identify the limits of the inquiry. To the extent White & Case produces documents in response to any Request, White & Case does not represent that "all" or "any" documents responsive to any Request will be collected or produced.

4. White & Case objects to each and every Request to the extent that it is not reasonably limited in time or otherwise not limited to a time frame relevant to the W&C Fee Application. Each such Request is overly broad, unduly burdensome, and seeks the discovery of information or documents that are not relevant to the subject matter of this proceeding and/or not proportional to the needs of this case.

5. White & Case objects to the Requests to the extent that they seek disclosure of documents or information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest or joint defense privilege, or any other protection, privilege or immunity against disclosure available under any applicable law (collectively, "**Privileged Materials**"). To the extent White & Case produces documents, White & Case will not produce any Privileged Materials. White & Case expressly reserves the right to redact non-responsive, proprietary, commercially sensitive, privileged or protected portions of any documents that may be produced in response to the Requests. Pursuant to Federal Rule of Evidence 502(d) as well as any other applicable laws, rules, regulations, court orders, or agreements, if any Privileged Material is inadvertently produced or disclosed, White & Case does not waive or intend to waive any privilege or immunity from discovery pertaining to such Privileged Material or to any other documents or information and reserves the right to demand the return of all copies of any such document(s). To the extent that there are inconsistencies in the types of privilege or other protections asserted with respect to various copies of the same document, the most comprehensive privilege or protection is intended to apply to all copies of such document.

6. White & Case objects to the Requests to the extent that they seek documents containing confidential, personal, private, proprietary, or sensitive business information; or information protected from disclosure by any law (including, but not limited to, foreign laws),

court order, or any agreement with respect to confidentiality or non-disclosure (collectively, "**Confidential Materials**"). White & Case reserves the right to redact any documents that may be produced including, but not limited to, the right to redact personally identifying information.

7. White & Case objects to each Request to the extent it expressly or impliedly assumes the existence of facts or circumstances that do not or did not exist, or states or assumes legal or factual conclusions. White & Case does not admit any factual or legal premise in these Requests. White & Case's Responses and Objections should not be construed as: (a) any admission as to the propriety of any Request; (b) an agreement as to erroneous assumptions or incorrect factual predicates contained in any Request; (c) an acknowledgment that documents or other items responsive to any Request exist; (d) a waiver of the General Objections or the objections asserted in response to specific Requests; (e) an admission as to the relevance or admissibility into evidence of any documents, items, materials, communications, or information; (f) an admission, concession, or waiver as to the validity of any claim or defense; or (g) an agreement that requests for similar documents, items, materials, communications, or information will be treated similarly.

8. White & Case objects to each Request to the extent that it seeks information that is in the possession, custody, or control of the Reorganized Debtors, publicly available, or can be obtained from another more convenient, less expensive, or less burdensome source.

9. White & Cases objects to each Request to the extent that it seeks to impose an obligation to provide information not in White & Case's possession, custody, or control, or to create documents that do not exist.

10. To the extent any term defined or used in the Requests is used in responding to the Requests, it is not accepted or conceded that any such term or definition is appropriate, descriptive

or accurate.

11. White & Case objects to each Request to the extent that it requires White & Case to search for and produce electronically stored documents from sources that are not reasonably accessible because of undue burden or cost.

12. White & Case preserves (a) all rights to object on any ground to the use of any document or information produced in response to the Requests or the subject matter thereof, in any proceeding; and (b) all rights to object on any ground to any request for further responses to the Requests or any other document request.

13. Any documents produced in response to any Request are solely for use in these chapter 11 cases and shall be governed by the terms of the *Confidentiality Agreement and Stipulated Protective Order* [Dkt. No. 174] (the "**Protective Order**").

14. The Responses and Objections represent White & Case's present knowledge, information, and belief. White & Case reserves the right to supplement, amend, correct, clarify or modify these responses and objections as additional information becomes known, including based on discovery and future developments in this action.

OBJECTIONS TO DEFINITIONS

White & Case objects to the following definitions in the Requests. The failure to object to any of the definitions shall not be deemed a waiver of any objections or a concession that any of the definitions are factually accurate.

1. White & Case objects to the Definition of "Billing Practices" as it contains improper assumptions concerning alleged billing "goals, targets, [or] expectations" and "revision or editing of time entries." White & Case further objects to the Definition of "Billing Practices" as vague and ambiguous for its use of "commentary" and "volume of hours," which are undefined.

2. White & Case objects to the Definition of "Communication" to the extent that it purports to impose burdens or obligations on White & Case that are broader than, inconsistent with, or not authorized by the Rules. White & Case further objects to this Definition on the grounds that it is overbroad, unduly burdensome, seeks to impose burden and expense that outweigh their benefits, and is not proportional to the needs of the W&C Fee Application.

3. White & Case objects to the Definition of "White & Case Personnel" as vague and ambiguous, overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application, because it purports to include "any other person . . . affiliated with White & Case." White & Case will understand "White & Case Personnel" to refer only to those employed by White & Case.

4. White & Case objects to the Definition of "Deposition Materials" as overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application especially in light of its purported inclusion of "any subsequent iteration, revision, or adaptation of any such document for use in a later deposition." White & Case will understand "Deposition Materials" to refer to the specific materials enumerated in the Definition without reference to "any subsequent iteration, revision, or adaptation of any such document for use in a later deposition."

5. White & Case objects to the terms or phrases defined by the Debtors to the extent that those terms and phrases are vague or ambiguous or beyond their customary meanings. White & Case has made reasonable efforts to understand the terms in the Requests as used in context, but White & Case makes its responses and objections based on its understanding of such terms and reserves the right to amend the responses and objections herein if the Reorganized Debtors assert different meanings of such terms.

OBJECTIONS TO INSTRUCTIONS

White & Case objects to the Instructions. The Requests target the production of materials from White & Case, a law firm, related to work completed by White & Case during its retention in the above-captioned cases. The burden to review and log Privileged Materials in response to such Requests is excessive and not proportional to the needs of the W&C Fee Application. To the extent White & Case withholds any information on the basis of privilege, White & Case will seek to meet and confer regarding the Instructions as they relate to a privilege log.

SPECIFIC OBJECTIONS AND RESPONSES

Subject to and without waiving the foregoing General Objections, which are hereby expressly incorporated into each of the following specific objections and responses as if fully set forth therein, White & Case responds to the Reorganized Debtors' specific Requests as follows:

REQUEST FOR PRODUCTION NO. 1

All Communications among White & Case Personnel concerning Billing Practices in connection with the Engagement, including but not limited to any communications regarding the volume of hours to be billed to the Engagement, any targets or expectations regarding fees to be generated from the Engagement, or any instructions or guidance regarding increasing or decreasing the amount of time recorded by any timekeeper on any task or matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request on the basis

that it is vague and ambiguous, including because it requests production of communications concerning "Billing Practices," a vague and ambiguous term as defined in the Requests. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as seeking information already in the Reorganized Debtors' possession and refers the Reorganized Debtors to communications by and among White & Case and Latham & Watkins, LLP concerning weekly budgets for work performed by White & Case during the Engagement.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 2

All Communications among White & Case Personnel concerning the staffing of the Engagement, including but not limited to any communications regarding the number of timekeepers to be assigned to any hearing, deposition, committee call, drafting task, or document review project, or any communications regarding whether particular timekeepers should bill time to the Engagement or to any particular task within the Engagement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 3

All Communications among White & Case Personnel concerning the review, revision, editing, reduction, or write down of time entries recorded in connection with the Engagement, including but not limited to any communications regarding the "voluntary reductions" referenced in the Final Fee Application, any communications identifying specific entries to be reduced or written off, any communications regarding whether particular time entry descriptions should be revised before submission, and any communications regarding the criteria applied in determining which entries to reduce.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking

documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request No. 1.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 4

All Communications among White & Case Personnel concerning the $30 million demand referenced in the Objection, to the extent such communications relate to Billing Practices or the relationship between the demand and the anticipated or actual level of professional fees in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the phrase "relationship between the demand and the anticipated or actual level of professional fees" as vague and ambiguous. White & Case further objects to this Request as seeking documents or information

protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 5

All orders, opinions, rulings, or decisions issued by any bankruptcy court in any case in which White & Case LLP served as counsel, that reduced, denied, or disallowed fees or expenses sought by White & Case on the basis of overstaffing, excessive billing, duplicative services, block billing, vague or insufficient time entries, unnecessary litigation, scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate, or any other billing practice or litigation conduct that resulted in a judicial finding that fees requested by White & Case were unreasonable, unnecessary, or otherwise not compensable.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to the phrase "unnecessary litigation,

scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate" as vague, ambiguous, and undefined. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 6

All pleading [sic] filed in any bankruptcy court in any case in which White & Case LLP served as counsel that alleged or asserted that White & Case LLP: (a) overstaffed matters; (b) excessively billed; (c) duplicated services; (d) engaged in block billing; (e) submitted vague or insufficient time entries; (f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case

further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to the phrase "(f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate" as vague, ambiguous, and undefined. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 7

All pleadings filed in any bankruptcy court in any case in which White & Case LLP served as counsel in which any party requested, sought, or argued for the reduction, denial, modification, or disallowance of any attorney's fees or costs requested by White & Case LLP, regardless of whether such request or objection was sustained, overruled, or otherwise resolved.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White &

Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 8

All Communications among White & Case Personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent such communications relate to Billing Practices, staffing decisions, or the volume of fees being generated in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions regarding the substantive response to the Statement, but solely communications regarding whether and how the Statement should affect billing or staffing decisions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 9

All Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application, including but not limited to any communications regarding the assignment or reassignment of time entries to project codes or billing categories, any communications regarding the allocation of time entries across multiple project categories, any communications regarding the "overlap" between project categories that White & Case acknowledges in the Final Fee Application, any communications regarding which project code a particular time entry should be billed to or categorized under, any communications regarding the narrative descriptions included in the Final Fee Application, and any communications regarding how the work performed by White & Case Personnel should be presented, described, or organized in the Final Fee Application.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "assignment or reassignment of time entries." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request Nos. 1 and 3.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 10

All deposition outlines prepared, drafted, revised, or used by any White & Case Personnel in connection with any deposition taken during the Engagement. White & Case may redact portions of any deposition outline reflecting attorney strategy, confidential client information, or other protected work product to address any privilege concerns.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case objects to this Request to the extent it seeks documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege,

immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 11

All documents sufficient to show any internal budget, fee estimate, fee projection, or anticipated fee range prepared, drafted, or considered by White & Case LLP in connection with the Engagement, regardless of whether such budget, estimate, projection, or range was finalized, approved, or filed.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to show" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "anticipated fee range." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits

for the contested matter at issue. White & Case further objects to this Request as seeking information already in the Reorganized Debtors' possession and refers the Reorganized Debtors to, among other things, communications by and among White & Case and Latham & Watkins, LLP concerning weekly budgets for work performed by White & Case during the Engagement. White & Case further objects to this Request to the extent it is duplicative of Request No. 1.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 12

All Communications among White & Case Personnel concerning whether a budget, fee estimate, fee projection, or anticipated fee range should be prepared or filed in connection with the Engagement, including any Communications discussing reasons for preparing, not preparing, filing, or not filing such a budget or estimate.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "anticipated fee range." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection.

White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request Nos. 1 and 11.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 13

All Communications among White & Case Personnel concerning whether the professional fees incurred or anticipated to be incurred in connection with the Engagement were excessive, unusually high, disproportionate to the matters at issue, likely to draw objection, or otherwise at risk of reduction or disallowance by the Court.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested

matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 14

All Communications among White & Case Personnel concerning the entry of time after the work was performed, including any Communications concerning delayed time entry, reconstruction of time entries, or instructions to enter time for prior dates.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "delayed time entry, reconstruction of time entries." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case

will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 15

All documents sufficient to show the date and time each time entry billed to the Engagement was created, entered into White & Case LLP's billing system, modified, or submitted for billing, including any audit logs, metadata, or system reports reflecting the creation, modification, and history of such entries.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to show" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 16

All documents sufficient to identify the billing or timekeeping system used by White & Case LLP in connection with the Engagement[.]

RESPONSE TO REQUEST FOR PRODUCTION NO. 16

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to identify" without limitation.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

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Dated: April 2, 2026
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP
Charles R. Koster (Texas Bar No. 24128278)
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Houston, Texas 77002
Telephone: (713) 496-9700
Email: charles.koster@whitecase.com

WHITE & CASE LLP
J. Christopher Shore (admitted *pro hac vice*)
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Facsimile: (212) 354-8113
Email: cshore@whitecase.com
sgreissman@whitecase.com

- and -

WHITE & CASE LLP
Jason N. Zakia (admitted *pro hac vice*)
Gregory F. Pesce (admitted *pro hac vice*)
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Facsimile: (312) 881-5450
Email: jzakia@whitecase.com
gregory.pesce@whitecase.com

Counsel for the Official Committee of Unsecured Creditors

EXHIBIT C

Chase, Ashley

From: Johnson, Scott <Scott.Johnson@fticonsulting.com>
Sent: Friday, October 31, 2025 3:00 PM
To: Zatz, Andrew; Saldanha, Riz
Cc: Kiyosaki, David (External); Shapiro, Jill; Smith, Erin; Shore, Christopher; Zakia, Jason; Chase, Ashley; Greissman, Scott; Lingle, Barrett; Litz, Dominic; Pesce, Gregory
Subject: Re: MODV - Professional Escrow Funding

Thank you Andrew. In the interest of time we instructed the company to fund the account earlier today. Without an estimate we deferred to the original budget funding amount of $100k. We will true up your balance next week.

Best,

Scott Johnson
Director, Corporate Finance

FTI Consulting
+1 713.452.0523 T | +1.817.709.9592 M
Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>

999 17th St | #700
Denver, CO 80202
www.fticonsulting.com<http://www.fticonsulting.com>

From: Zatz, Andrew <azatz@whitecase.com>
Sent: Friday, October 31, 2025 12:52 PM
To: Saldanha, Riz <Riz.Saldanha@fticonsulting.com>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com>; Smith, Erin <erin.smith@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zakia, Jason <jzakia@whitecase.com>; Chase, Ashley <ashley.chase@whitecase.com>; Greissman, Scott <sgreissman@whitecase.com>; Lingle, Barrett <barrett.lingle@whitecase.com>; Litz, Dominic <dominic.litz@whitecase.com>; Pesce, Gregory <gregory.pesce@whitecase.com>; Johnson, Scott <Scott.Johnson@fticonsulting.com>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

Riz – you can put us down for $900K for 10/20-10/26 and we estimate another $1mm the following week.

Best regards,

Andrew Zatz | Partner

T +1 212 819 8504<tel:+12128198504> M +1 845 558 1024<tel:+18455581024> E azatz@whitecase.com<mailto:azatz@whitecase.com>

White & Case LLP | 1221 Avenue of the Americas | New York, NY 10020-1095

[cid:image001.png@01DC4A76.040783F0]

From: Saldanha, Riz <Riz.Saldanha@fticonsulting.com>
Sent: Thursday, October 30, 2025 8:59 PM
To: Pesce, Gregory <gregory.pesce@whitecase.com>; Johnson, Scott <Scott.Johnson@fticonsulting.com>; Zatz, Andrew <azatz@whitecase.com>
Cc: Kiyosaki, David (External) <David.Kiyosaki@fticonsulting.com>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com>; Smith, Erin <erin.smith@whitecase.com>; Shore, Christopher <cshore@whitecase.com>; Zakia, Jason <jzakia@whitecase.com>; Chase, Ashley <ashley.chase@whitecase.com>; Greissman, Scott <sgreissman@whitecase.com>; Lingle, Barrett <barrett.lingle@whitecase.com>; Litz, Dominic <dominic.litz@whitecase.com>
Subject: RE: MODV - Professional Escrow Funding

Gregory – just following up on this.

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>
Sent: Thursday, October 30, 2025 11:24 AM
To: Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>; Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>; Lingle, Barrett <barrett.lingle@whitecase.com<mailto:barrett.lingle@whitecase.com>>; Litz, Dominic <dominic.litz@whitecase.com<mailto:dominic.litz@whitecase.com>>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

We'll get back to you after hearing

Gregory F. Pesce | Partner

T +1 312 881 5360 E gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>

White & Case LLP | 111 South Wacker Drive, Suite 5100 | Chicago, IL 60606-4302

[cid:image002.png@01DC4A76.040783F0]

From: Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>

Date: Thursday, Oct 30, 2025 at 10:35 AM

To: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>, Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>

Cc: Kiyosaki, David (External) <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>, Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>, Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>, Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>, Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>, Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>, Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>, Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>

Subject: Re: MODV - Professional Escrow Funding

All,

Following up on this again. Please send us the following by EOD today:

1. Fee estimate for last week (10/20 - 10/26)
1. Fee estimate for this week (10/27 - 11/2)
1. Updated estimates for November/December, if any
    * We currently have ~$5.9M for November and December ($11.9M total)

Best,

Scott Johnson

Director, Corporate Finance

FTI Consulting

+1 713.452.0523 T | +1.817.709.9592 M

Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>

999 17th St | #700

Denver, CO 80202

www.fticonsulting.com<http://www.fticonsulting.com>

From: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>
Sent: Wednesday, October 29, 2025 10:00 AM
To: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

Apologies for the multiple follow-ups but in addition to the below (last week and November/December estimates), could you also please provide an estimate for this week (10/27 – 11/2) as well?

Thanks in advance,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Saldanha, Riz
Sent: Tuesday, October 28, 2025 9:46 AM
To: 'Zatz, Andrew' <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; 'Smith, Erin' <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; 'Shore, Christopher' <cshore@whitecase.com<mailto:cshore@whitecase.com>>; 'Zakia, Jason' <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; 'Pesce, Gregory' <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; 'Chase, Ashley' <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; 'Greissman, Scott'

<sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

Andrew / W&C team,

Following up on the below. Additionally, could you please provide a fee/expense estimate for last week (10/20 – 10/26) by tomorrow morning?

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>
Sent: Friday, October 24, 2025 5:45 PM
To: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

W&C team,

We have a revised Budget due next Friday and are updating the forecast for all professionals. We currently have ~$5.9M for November and December ($11.9M total) budgeted for W&C. Can you please confirm if this is still accurate or provide updated amounts?

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Sent: Thursday, October 23, 2025 5:23 PM
To: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

Riz – you can put us down for $800K for 10/13-10/19 and $5mm from inception to 10/19.

Andrew Zatz | Partner

T +1 212 819 8504<tel:+12128198504> M +1 845 558 1024<tel:+18455581024> E azatz@whitecase.com<mailto:azatz@whitecase.com>

White & Case LLP | 1221 Avenue of the Americas | New York, NY 10020-1095

[cid:image003.png@01DC4A76.040783F0]

From: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>
Sent: Thursday, October 23, 2025 5:20 PM
To: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David (External) <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

W&C team,

Could you please provide your estimate for last week and confirm all fees/expenses incurred through 10/19? We are planning to fund the Escrow Account tomorrow.

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Saldanha, Riz
Sent: Thursday, October 23, 2025 12:09 PM
To: 'Zatz, Andrew' <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; 'Smith, Erin' <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; 'Shore, Christopher' <cshore@whitecase.com<mailto:cshore@whitecase.com>>; 'Zakia, Jason' <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; 'Pesce, Gregory' <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; 'Chase, Ashley' <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; 'Greissman, Scott' <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

Andrew – just following up on this.

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Saldanha, Riz
Sent: Wednesday, October 22, 2025 5:42 PM
To: 'Zatz, Andrew' <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher

<cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

Andrew,

Could you please provide a fee/expense estimate for last week (10/13 – 10/19) by tomorrow morning? Additionally, could you also provide an estimate for all fees/expenses incurred through 10/19?

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Sent: Thursday, October 16, 2025 5:06 PM
To: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

Riz - you can put us down for $800K.

Andrew Zatz | Partner

T +1 212 819 8504<tel:+12128198504> M +1 845 558 1024<tel:+18455581024> E azatz@whitecase.com<mailto:azatz@whitecase.com>

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[cid:image003.png@01DC4A76.040783F0]

From: Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>

Date: Wednesday, Oct 15, 2025 at 9:35 AM

To: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>

Cc: Kiyosaki, David (External)
<David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>, Shapiro, Jill
<Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>, Johnson, Scott
<Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>, Smith, Erin
<erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>, Shore, Christopher
<cshore@whitecase.com<mailto:cshore@whitecase.com>>, Zakia, Jason
<jzakia@whitecase.com<mailto:jzakia@whitecase.com>>, Pesce, Gregory
<gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>, Chase, Ashley
<ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>, Greissman, Scott
<sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>

Subject: RE: MODV - Professional Escrow Funding

Andrew,

Could you please provide a fee/expense estimate for last week (10/6 – 10/12) by EOD today?

Thanks,

Riz Saldanha

240.584.7008 T | 412.352.4341 M

riz.saldanha@fticonsulting.com<mailto:riz.saldanha@fticonsulting.com>

From: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Sent: Wednesday, October 8, 2025 1:30 PM
To: Twohy, Emma <Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>;
Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott
<Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Saldanha, Riz
<Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>; Smith, Erin
<erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher
<cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason
<jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory
<gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley
<ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott
<sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

$900K

Andrew Zatz | Partner

T +1 212 819 8504<tel:+12128198504> M +1 845 558 1024<tel:+18455581024> E azatz@whitecase.com<mailto:azatz@whitecase.com>

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[cid:image003.png@01DC4A76.040783F0]

From: Twohy, Emma <Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>>
Sent: Wednesday, October 8, 2025 1:09 PM
To: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Cc: Kiyosaki, David (External) <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Saldanha, Riz <Riz.Saldanha@fticonsulting.com<mailto:Riz.Saldanha@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: RE: MODV - Professional Escrow Funding

Hi Andrew – could you please provide a fee/expense estimate for last week (9/29 – 10/5) by EOD today? Thank you!

Best,

Emma Twohy

+1.667.453.8095 M

Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>

From: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Sent: Saturday, October 4, 2025 10:10 AM
To: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>
Cc: Twohy, Emma <Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Johnson, Scott

<Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Project Mountains FTI WG <FTIWG_ProjectMountains@fticonsulting.com<mailto:FTIWG_ProjectMountains@fticonsulting.com>>; ModivCare <ModivCare@alixpartners.com<mailto:ModivCare@alixpartners.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>; Greissman, Scott <sgreissman@whitecase.com<mailto:sgreissman@whitecase.com>>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

David,

You can put W&C down for about $2mm accrued so far and an estimated $17.8mm go-forward.

Best regards,

Andrew Zatz | Partner

T +1 212 819 8504<tel:+12128198504> M +1 845 558 1024<tel:+18455581024> E azatz@whitecase.com<mailto:azatz@whitecase.com>

White & Case LLP | 1221 Avenue of the Americas | New York, NY 10020-1095

[cid:image003.png@01DC4A76.040783F0]

From: Kiyosaki, David (External) <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>
Sent: Friday, October 3, 2025 2:44 PM
To: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>; Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>
Cc: Twohy, Emma <Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Project Mountains FTI WG <FTIWG_ProjectMountains@fticonsulting.com<mailto:FTIWG_ProjectMountains@fticonsulting.com>>
Subject: RE: MODV - Professional Escrow Funding

Andrew – following up here. Let me know if you have an estimate of fees incurred to date and any estimate of go-forward fees for inclusion in the 13 week.

Thanks,

David

David Kiyosaki

+1.720.238.7644 M

David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>

From: Zatz, Andrew <azatz@whitecase.com<mailto:azatz@whitecase.com>>
Sent: Thursday, September 25, 2025 6:34 AM
To: Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>; Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>; Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>; Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>; Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>; Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>
Cc: Kiyosaki, David <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>; Twohy, Emma <Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>>; Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>; Project Mountains FTI WG <FTIWG_ProjectMountains@fticonsulting.com<mailto:FTIWG_ProjectMountains@fticonsulting.com>>
Subject: [EXTERNAL] RE: MODV - Professional Escrow Funding

Scott — we'll get back to you on this after Tuesday's hearing.

Best regards,

Andrew Zatz | Partner

T +1 212 819 8504<tel:+12128198504> M +1 845 558 1024<tel:+18455581024> E azatz@whitecase.com<mailto:azatz@whitecase.com>

White & Case LLP | 1221 Avenue of the Americas | New York, NY 10020-1095

[cid:image003.png@01DC4A76.040783F0]

From: Johnson, Scott <Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>>

Date: Thursday, Sep 25, 2025 at 2:40 AM

To: Smith, Erin <erin.smith@whitecase.com<mailto:erin.smith@whitecase.com>>, Shore, Christopher <cshore@whitecase.com<mailto:cshore@whitecase.com>>, Zakia, Jason <jzakia@whitecase.com<mailto:jzakia@whitecase.com>>, Pesce, Gregory <gregory.pesce@whitecase.com<mailto:gregory.pesce@whitecase.com>>, Zatz, Andrew

<azatz@whitecase.com<mailto:azatz@whitecase.com>>, Chase, Ashley <ashley.chase@whitecase.com<mailto:ashley.chase@whitecase.com>>

Cc: Kiyosaki, David (External) <David.Kiyosaki@fticonsulting.com<mailto:David.Kiyosaki@fticonsulting.com>>, Twohy, Emma <Emma.Twohy@fticonsulting.com<mailto:Emma.Twohy@fticonsulting.com>>, Shapiro, Jill <Jill.Shapiro@fticonsulting.com<mailto:Jill.Shapiro@fticonsulting.com>>, Project Mountains FTI WG <FTIWG_ProjectMountains@fticonsulting.com<mailto:FTIWG_ProjectMountains@fticonsulting.com>>

Subject: MODV - Professional Escrow Funding

All,

Pursuant to see page 47, para 7(i) of the attached DIP Order, a segregated Escrow Account has been created to deposit funds for both Debtor and UCC professionals, to be paid out once fee applications are submitted and the applicable objection periods pass. FTI has been reaching out to all impacted professionals weekly to get fee estimates for past work done and instructing the Company to fund the Account.

To that end, please provide us with an estimate for fees and expenses incurred through end of week last Friday 9/19.

Best,

Scott Johnson

Director, Corporate Finance

FTI Consulting

+1 713.452.0523 T | +1.817.709.9592 M

Scott.Johnson@fticonsulting.com<mailto:Scott.Johnson@fticonsulting.com>

999 17th St | #700

Denver, CO 80202

www.fticonsulting.com<http://www.fticonsulting.com>

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Our external privacy policy is available on https://www.whitecase.com/privacy-policy.

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Our external privacy policy is available on https://www.whitecase.com/privacy-policy.

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This email communication is confidential and is intended only for the individual(s) or entity named above and others who have been specifically authorized to receive it. If you are not the intended recipient, please do not read, copy, use or disclose the contents of this communication to others. Please notify the sender that you have received this email in error by replying to the email or by telephoning +1 212 819 8200. Please then delete the email and any copies of it. Thank you.

Our external privacy policy is available on https://www.whitecase.com/privacy-policy.

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Attachments:

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image003.png	(4 KB)

EXHIBIT D

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION
----------x
IN RE: Case No.: 25-90309
MODIVCARE INC., et al.,
Debtors.
----------x

*** HIGHLY CONFIDENTIAL ***

VIDEOTAPED DEPOSITION
OF
ZUL JAMAL, Individually and
As Corporate Representative of
MOELIS & COMPANY
Thursday, November 20, 2025

Reported by:
Frank J. Bas, RPR
JOB NO. 7757482

November 20, 2025

10:06 a.m. EST

Videotaped Deposition of ZUL JAMAL, held at the law offices of WHITE & CASE LLP, 1221 Avenue of the Americas, New York, New York, before Frank J. Bas, a Registered Professional Reporter and Notary Public of the State of New York.

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KIM FANG, Moelis
SIMON SHNAYDER, TCW

Z. JAMAL

Q. So is Mr. Mounts Gonzales just wrong?

A. I mean, I think so.

Q. Okay. Good, I'm glad to say.

Do you believe that the committee is approaching this case as a terrorist?

MS. WINE: Object to the form.

A. I don't know what -- I don't know what that really means.

Q. Okay. Well, you agree with me that "terrorist" is a fairly pointed word?

MS. WINE: Object to the form.

A. Yes.

Q. So let's see if we can maybe bring down the temperature in the case.

You understand that official committees of unsecured creditors have duties that they need to fulfill in the case, right?

A. Yes.

Q. Okay. And how would you describe your understanding, if any, of those duties generally?

A. They are supposed to act as fiduciaries on behalf of all unsecured

creditors.

Q. Okay. And would you agree that those duties to act as fiduciaries typically play out in certain acts taken by committees?

MS. WINE: Objection to form.

A. Yes. The committee does -- always does certain things. What they do I think would vary case to case.

Q. Now let's draw a distinction with respect to ad hoc groups of creditors.

You've interacted with ad hoc groups of creditors, right?

A. I have.

Q. And is it your understanding, just as a business perspective, that ad hoc groups of creditors bear the same duties with respect to a class of creditors as a whole?

MS. WINE: Objection to form.

A. They don't.

Q. Right. So, for example, the consenting creditors in this case, is it your understanding that they owe duties to all secured creditors in these cases?

A. I don't believe they do.

Z. JAMAL

Q. Okay. Let's talk about what this particular UCC has done.

In your experience, is it common for a UCC to seek to form views on distributable value in a Chapter 11 case?

MR. STANFIELD: Objection to the form of the question.

A. It could be something they do, yes.

Q. Okay. Have you done it when you've been an advisor to a committee, formed views as to distributable value under a plan?

MR. STANFIELD: Hold on a second.

Objection to the form of the question.

A. Yes.

Q. Okay. And as part of that exercise of determining distributable value, is it common in your experience for committees to hire advisors?

MR. STANFIELD: Object to the form of the question.

A. In my experience UCCs typically hire advisors, yes.

Q. Okay. And have you ever heard of

Alix Partners being described as a terrorist in any case?

MR. STANFIELD: Object to the form of the question.

A. Not that I can recall.

Q. In your experience, has Alix Partners ever taken extreme views that you would find to be outside the bounds of normal FA behavior?

MS. WINE: Objection to form.

A. I don't know what that means.

Q. Okay. In a case in which -- in a big Chapter 11, is it common for, in your experience, for a financial advisor for a committee to perform valuations?

A. It might be something they do.

Q. Okay. And where did the distributable values -- have you been involved in other cases where distributable value is post-reorganization stock?

A. Yes.

Q. And that's the distributable value largely in this case, right?

MR. STANFIELD: Objection; form.

A. Yes. Primarily the recovery that creditors are receiving here is in the form of equity in the reorganized company.

Q. Right. And then there's a cash component?

A. Yes. A modest one.

Q. Right. Is there any other value being distributed under the current plan on file other than post-reorg equity and cash?

A. Yes.

Q. What's that?

A. Debt.

Q. And that's the takeback debt to the 1L?

A. That's correct.

Q. Let me rephrase my question.

Is there any distributable value that's being offered under the current plan to general unsecured creditors other than post-reorg equity and cash?

A. Yes.

Q. What's that?

A. Warrants.

Q. Okay. And is it, in your view, in

a plan which provides for warrants for distribution, that you would expect an unsecured creditors' committee to form views with respect to the value of such warrants?

A. It might be something they do, yes.

Q. Okay. Well, you say it "might be."

Would it be outside the bounds of expected behavior for a committee to value warrants if warrants are being offered to unsecured creditors?

A. No.

MR. STANFIELD: Objection; form.

THE WITNESS: Sorry.

BY MR. SHORE:

Q. Can you think of any reason why a UCC financial advisor would not want to blindly -- sorry. Let me -- I missed a question here.

As part of a valuation exercise of post-reorg equity, would you expect that any committee FA will analyze a debtor's business plan?

MS. WINE: Objection to form.

A. That certainly might be something

they do for sure, yes.

Q. That's something you did when you represented committees, right; formed views with respect to the appropriateness of the business plan to be used in a valuation?

A. Yes.

Q. Okay. And can you think of any reason why a financial advisor to UCC would not want to blindly rely on a business plan prepared by debtors' management? Can you think of reasons?

MS. WINE: Object to the form.

A. Sorry. Can you -- I just want to make sure.

Q. Sure.

A. Can you ask the question again?

Q. Sure. In your experience, do unsecured creditors committees' FAs blindly rely on business plan projections prepared by management in connection with a Chapter 11 case?

MS. WINE: Objection to form.

A. I don't think anyone blindly relies on stuff prepared by management.

Z. JAMAL

Q. Can you explain some of the reasons why you wouldn't want to -- why no one would blindly rely on management projections?

MS. WINE: The same objection.

A. Well, because in order to analyze something, whether for performing valuation or otherwise, you need to understand it. And blind reliance suggests, at least the way you used it, and maybe I'm misunderstanding your use, that you just take it as given and don't even understand what it means.

And it's hard to do something when you don't understand what it means.

Q. Okay. Did you have any expectation when you were preparing your valuation in this case that the committee would be looking at the debtors' valuation?

A. I expected they would look at it.

Q. And did you expect that the committee would also be looking at the business plan?

A. Yes.

Q. And you know that Alix has now formed views on both, right?

Z. JAMAL

A. That's my understanding.

Q. And that those views have been laid out in two expert reports which have been circulated to the debtors and the other creditors, subject to the confi in this case, right?

A. That's correct.

Q. Okay. I'll get to this later, but in your view, do you view either report as having been prepared in bad faith?

MS. WINE: Objection to form.

A. Bad faith? I don't think so.

Q. Well, you have no reason to believe that either Mr. Brown or Mr. Magrisi set forth views that they don't actually hold?

MR. STANFIELD: Objection; form.

A. I haven't talked to them. I have no reason to believe it one way or the other.

Q. Now, in your experience dealing with creditors committees, is it common for financial advisors to a committee to engage in periodic calls with the debtors' management or financial advisors to discuss things like business plan?

Z. JAMAL

MS. WINE: Objection to form.

A. Yes, they typically do.

Q. And that's happened here, right? The Alix team has met periodically with the Moelis and FTI teams to discuss aspects of the case?

A. Yes.

Q. Okay. Have you participated in those?

A. I think maybe a couple of them.

Q. Okay. And in your experience was Alix doing anything that you thought was appropriate -- sorry -- inappropriate?

A. Nothing comes to mind sitting here right now.

Q. In addition to the exchange of information and calls, is it common in your experience for committees to issue document requests and deposition notices?

A. I would say it's common to ask for diligence. I don't know that I would describe deposition notices as common.

Q. Okay. Have you experienced cases where deposition notices and document requests

have been served?

A. Yes.

Q. Okay. And are you aware that that has happened in this case?

A. Yes.

Q. And are you aware of whether or not the debtors have voluntarily agreed to produce documents and witnesses in response to the requests?

MS. WINE: Objection to form.

MR. STANFIELD: Objection; form.

A. Yes.

Q. Okay. Let's talk about the schedule for a bit.

All of that discovery has been taking place, to your knowledge, on an accelerated timeline, right?

A. I don't know what "accelerated" means in this context. I think it's been taking place on a timeline that we have.

Q. Okay. And that was pursuant to a scheduling order that was entered in the case, right?

MS. WINE: Objection to form.

Q. Do you know?

A. I don't actually know whether a scheduling order was entered in this case or not.

Q. Do you know when the debtors were originally seeking to have their confirmation hearing?

A. I believe before Thanksgiving.

Q. Okay. And you're aware that the Court has now pushed that to next month?

A. I am.

Q. Okay. In your experience is one of the things that committees do when appointed is form views with respect to the motions that a debtor has filed on the first day of the case?

MS. WINE: Objection to form.

A. Yes.

Q. Okay. Do you have a recollection of what the committee actually objected to with respect to the first-day motions that were heard on the second-day hearing?

A. Yes.

Q. What?

Z. JAMAL

A. The DIP. And then I believe there was some objection to I think the critical vendor payments.

Q. Okay. Did you think that there was anything untoward or unexpected about the committee's objection to the DIP?

MR. STANFIELD: Objection to form.

MS. WINE: Objection to form.

A. Yes.

Q. What?

A. I thought it was unexpected that they would object to the company obtaining financing when without the financing it wouldn't have been able to operate the business on an ongoing basis.

Q. Is it your understanding that the committee sought to have the entire DIP not approved or just certain terms?

A. Well, I think that because the DIP financing was an all-or-nothing proposition, objecting to certain terms was effectively or tantamount to objecting to the whole thing.

Q. Did the terms actually change in the DIP from the time it was proposed to the

Court and the time the DIP order was entered?

A. Yes.

Q. Okay. And why did that happen?

MS. WINE: Objection to form.

A. I --

Q. If you know.

A. I don't know the specifics of why it happened.

Q. At the time of the DIP, had you prepared any views of total enterprise value of the debtors?

A. I think our valuation work at the time was ongoing, but, um, the timeline is, you know, was such that I don't know what was done when. And so I would have to go back and try and remember exactly when we were done with our valuation relative to the DIP. But, you know, so I don't remember the specifics.

Q. Prior to the final DIP order being entered did you provide or Moelis provide any advice to the board with respect to what 20 percent of the post-reorg equity of the debtors was worth, which would be paid in the form of a DIP backstop fee?

A. I don't believe so. Again, I would have to go back and refresh my recollection on that.

Q. Okay. In your experience in connection with DIP objections, have you seen objections where an official committee has objected to a DIP?

A. Yes.

Q. Okay. And have you ever seen a committee object to a critical vendors motion in another case?

A. Not that I recall.

Q. Would you consider the objections to the DIP and the critical vendor motion to have been a committee acting as a terrorist?

MS. WINE: Objection to form.

A. As a terrorist? No. I don't think so.

Q. I think the only other real objection in the case so far has been to the UHC settlement.

Did you form any views with respect to the appropriateness of the committee objecting to the UHC settlement?

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)

REPLY OF ALIXPARTNERS, LLP TO
OBJECTION TO ITS FINAL FEE APPLICATION

AlixPartners, LLP ("AlixPartners"),[2] financial advisor for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases of the debtors and debtors in possession (the "Debtors" and after the Effective Date, collectively, the "Reorganized Debtors") submits this reply (the "AlixPartners Reply") in further support of to the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through December 29, 2025* [Docket No. 1288] (the "Application"), and in response to the Reorganized Debtors' Objection.[3]:

[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. Reorganized Debtor ModivCare Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Application or *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 1055] ("Plan") .

[3] "Objection" refers to the *Objection to Final Fee Application filed by AlixPartners, LLP, filed by ModivCare Topco, LLC* [Docket No. 1351].

PRELIMINARY STATEMENT

1. The Objection is long on rhetoric and short on substance. It ignores the reality of the challenges facing the Committee's professionals when they were retained. As the First Day Declaration shows, FTI Consulting Ltd. ("FTI"), the financial advisor to the Debtors, began working on the Debtors' restructuring in November 2024, almost nine months before AlixPartners was engaged. The First Day Declaration characterizes the Debtors' corporate structure as complex, and the Restructuring Support Agreement and DIP allowed for very tight timeframes before confirmation. Given the complexity of the Debtors' businesses, and the pre-arranged nature of the cases, it should not be surprising that AlixPartners was required to quickly mobilize and dedicate substantial resources to understanding the company, its assets, and their values.

2. The Objection advances a series of generalized criticisms of the Committee's professionals that are disguised as "reasonableness" objections, mirroring positions that the Debtors' lenders (the so called "Consenting Creditors")[4] expressed throughout these Chapter 11 Cases regarding the Committee's role and the work performed by its advisors.[5] The present Objection is simply the culmination of that strategy: a last-ditch effort by the Consenting Creditors to continue litigating after a contested confirmation process through challenges to the fee applications of Committee professionals. Such an objection, untethered to the actual services

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4 "Consenting Creditors" refers to the entities listed in Exhibit A to the *Verified Statement Pursuant to Bankruptcy Rule 2019* [Docket No. 791].

5 *See Reservation of Rights of the Consenting Creditors with Respect to White & Case LLP's First Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including September 30, 2025, and First Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through September 30, 2025* [Docket No. 753] at ¶¶ 4 6. It is clear that the Consenting Creditors, now in control of the reorganized enterprise, are, through the Objection, using the Reorganized Debtors to further their pre-confirmation agenda.

performed, serves no legitimate purpose and instead threatens to impose further unnecessary costs on the estate.

3. The Objection represents an effort to punish the Committee professionals for zealously representing their client's interests. The record is clear: AlixPartners' work was critical to enabling the Committee to meet the accelerated timetable imposed by the Consenting Creditors and to fully litigate the complex valuation and business plan issues at the heart of these Chapter 11 Cases. Oddly, in challenging AlixPartners' hourly rates, the Debtors ignore the Court's order authorizing AlixPartners' retention in which those exact rates were approved. A challenge to the rates charged by AlixPartners could have and should have been made at the time AlixPartners filed its retention application, not in response to a final fee application. The Objection reflects a transparent attempt to punish Committee professionals for fulfilling the duties they were retained to perform.

4. The Application fully complies with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 500] and all applicable fee guidelines, and the fees and expenses requested are reasonable under section 330 of the Bankruptcy Code. Fee applications must provide sufficient information to allow the Court to evaluate the reasonableness and necessity of the services rendered.[6] The Application satisfies this standard and provides ample detail for the Court to assess the reasonableness of the services performed and expenses incurred. Because the Objection fails to identify any actual shortcoming in AlixPartners' work and instead attempts to use the compensation process as a litigation tactic, it should be overruled and the Application approved in full.

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[6] *See In re El Paso Refinery, L.P.*, 257 B.R. 809, 841 (Bankr. W.D. Tex. 2000) ("Normally, the fee application itself sets out evidence sufficient for a prima facie case that the final fee award sought to be approved is both reasonable and necessary within the meaning of the statute.").

RELEVANT BACKGROUND

5. These Chapter 11 Cases unfolded under an unusually compressed timeline, requiring the Committee and its professionals to investigate the Debtors' financial condition, develop expert analyses, and prepare for confirmation in a matter of weeks.

6. AlixPartners commenced its engagement with the Committee on September 10, 2025, and its retention was approved by this Court on November 4, 2025, at a critical stage of these Chapter 11 Cases. At the time AlixPartners commenced its engagement, the Debtors had already filed a Plan and Disclosure Statement and were pursuing an expedited path to confirmation, with the Confirmation Hearing scheduled for November 18, 2025 (at the request of the Committee, it was later moved to begin on December 8, 2025). As a result, the Committee and its professionals were left with an extraordinarily compressed time within which to discharge their statutory duties to investigate the Debtors' financial condition, analyze the proposed restructuring, participate in the formulation of a plan and prepare for what was expected to be (and, in fact, ultimately was) a contested Confirmation Hearing. *See* 11 U.S.C. 1103(c).

7. The Committee's work was particularly time-sensitive because the Debtors' Disclosure Statement assumed no recovery for unsecured creditors based on the Debtors' asserted valuation of the enterprise.[7] The Committee, however, believed the Debtors' valuation understated the value of the business and that a proper valuation analysis could materially affect recoveries for unsecured creditors. Because the Debtors were not pursuing a postpetition marketing or sales process, enterprise value would necessarily be determined at confirmation through expert testimony. This required the Committee, with the assistance of AlixPartners, to conduct an expedited, but comprehensive, review of the Debtors' financial projections, business operations,

[7] *See* Disclosure Statement, at pp. 7-8 (describing projected recoveries for general unsecured creditors).

and restructuring assumptions in order to develop an independent view on valuation and the Debtors' business plan.

8. Against this backdrop, AlixPartners mobilized a team of senior professionals across multiple workstreams to meet the accelerated schedule dictated by the lenders. In a matter of weeks, AlixPartners conducted extensive diligence on the Debtors' financial projections and operations, participated in numerous diligence sessions with the Debtors' financial advisor, interviewed company management, and prepared expert analyses addressing both the valuation of the enterprise and the Debtors' business plan. AlixPartners also submitted expert reports in advance of the Confirmation Hearing and its professionals were deposed and testified at the DIP hearing and the Confirmation Hearing. In addition, AlixPartners provided critical financial analysis and support in connection with the Committee's objection to the Debtors' proposed DIP financing and informed the Committee's litigation strategy and presentation at the Confirmation Hearing.

9. AlixPartners also worked closely with Committee counsel, White & Case LLP, to support the Committee's investigation and litigation efforts, as is customary practice in these situations. The Objection's critique that AlixPartners was overinvolved in legal matters demonstrates a misunderstanding of the collaboration between attorneys and financial advisors that is required in large, complex chapter 11 cases to improve unsecured creditors' recoveries. The lawyers are not expected to provide the financial advisory and analysis services, and the financial advisors are not expected to provide the legal skills, both of which were necessary to effectively advocate for the Committee. This work included assisting with discovery related to historical transactions, analyzing a significant prepetition liability management exercise undertaken six months prior to the Petition Date, evaluating potential causes of action, and supporting challenges

relating to liens and other issues under the Bankruptcy Code. AlixPartners further assisted with extensive discovery related to the Debtors' proposed plan and related litigation, including document review, participation in numerous depositions and management interviews, preparation for the Confirmation Hearing, and provided financial analysis that informed the Committee's presentation at the five-day confirmation trial.

10. Importantly, AlixPartners was retained not only to serve as the Committee's financial advisor but also to advise the Committee on valuation of the Debtors' assets. *See* [Docket No. 473] at Ex. B. By leveraging AlixPartners' capabilities in both capacities, the Committee avoided the need to retain a separate firm for valuation purposes, thereby saving the estate significant additional professional fees. This approach contrasted with the Debtors' own advisory structure, under which the Debtors retained both FTI as financial advisor and Moelis & Company ("Moelis") as investment banker, whose combined fees and expenses totaled approximately $20.8 million, far exceeding those of AlixPartners.[8]

11. Ultimately, the issues raised by the Committee, including valuation and the feasibility of the Debtors' business plan, were litigated during a five-day Confirmation Hearing that included extensive witness testimony, including that of two AlixPartners professionals. AlixPartners' work was critical to ensure the Committee could meet the accelerated timeline dictated by the Consenting Creditors and the Debtors and fully defend its positions in complex financial issues in furtherance of the Committee's statutory duties.

12. In fact, the Court found AlixPartners' valuation credible, as follows:

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[8] *See* FTI Consulting Inc.'s *Application for Final Allowance and Payment of Fees and Expenses as Financial Advisor, Chief Transformation Officer, and Additional Personnel for the Debtors for the Period from August 20, 2025 through December 29, 2025* [Docket No. 1270] and *Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025* [Docket No. 1276].

(Court) "First of all, I want to thank everyone for their presentations and their professionalism. I think I was very, very happy with the level of the quality of the briefs, the quality of the arguments, and I commend everybody for in a very, very short period of time being able to do that.

You gave me a lot to consider, a lot to read and to digest. So -- and literally there are -- there could be thousands of issues here."

Confirmation Hearing, Dec. 12, 2025 Tr. 4:24-25, 5:1-7.

(Court) "So I listened to the testimony of both Mr. Jamal and Mr. Brown. I found them both to be credible."

Confirmation Hearing, Dec. 12, 2025 Tr. 8:23-24.

OBJECTIONS TO THE APPLICATION AND REPLIES THERETO

13. The Objection seeks reductions to the Application based on a series of largely repetitive allegations, including purportedly above-market hourly rates, systemic overstaffing, improper billing practices, duplication of services performed by Committee counsel, and alleged deficiencies in time entry descriptions. As explained below, each of these arguments lacks merit.

14. The Objection fails to meet the legal standard required to challenge a professional's compensation under section 330 of the Bankruptcy Code. Under 11 U.S.C. § 330(a), the Court may award reasonable compensation for actual and necessary services based on the nature, extent, and value of the services rendered, including factors such as the time spent, rates charged, necessity of the services, and benefit to the estate. In assessing reasonableness, courts also apply the *Johnson* factors, which require a fact-specific evaluation of the services performed, including, among other considerations, the time and labor required, the complexity and novelty of the issues addressed, the skill required, and the results obtained. *See* 11 U.S.C. § 330(a)(1), (a)(3); *Johnson v. Georgia Highway Express, Inc*., 488 F.2d 714, 717-19 (5th Cir. 1974).

15. The Objection fails to satisfy the standard required to challenge a professional's compensation under section 330 of the Bankruptcy Code. An objection to fees must identify

specific deficiencies or demonstrate that the services were unreasonable. *See In re Bartenwerfer*, 613 B.R. 730, 736 (B.A.P. 9th Cir. 2020) ("Debtors were required to object to specific time entries to obtain a reduction or disallowance of fees. This entailed 'specifically identify[ing] defects or deficiencies in the hours requested. Conclusory and unsubstantiated objections are insufficient to warrant a reduction in fees.'"); *In re Kelsey*, 272 B.R. 830, 834 (Bankr. D. Vt. 2002) ("[T]hose challenging an attorney's fee application must articulate their objection with specificity, indicating particular entries that seem unreasonable, rather than expounding conclusory statements that applicant is seeking too much compensation"). The Objection does not do so. Instead, it raises broad and unsupported criticisms of the Committee's professionals while ignoring the extensive work performed by AlixPartners in connection with these Chapter 11 Cases.

16. The Objection also improperly attempts to evaluate isolated time entries in a vacuum, without considering the broader context of the Committee's engagement or the pace and complexity of the Chapter 11 proceedings in which the services were performed. *See In re Dabney*, 417 B.R. 826, 832-33 (Bankr. N.D. Ga. 2009) ("A reasonable fee must be a function not only of the complexity of the debts and assets of the debtor, but of the complexity of the debtor herself. Thus, reasonableness is a function of both objective factors such as time, complexity of issues, and length of representation, and subjective factors such as the nature of the client, the difficulty of the client's predicament, her reliability and predictability."); *In re Kyung Tae Ko*, 560 B.R. 245, 250-51 (Bankr. E.D. Pa. 2016) (stating that the "fee review and allowance process is a holistic one. It involves, on one level, looking at the big picture of a case. What were the results obtained? What were the problems encountered? What expertise did counsel bring to the case? Was the rate charged for the services within the legal community norms? And, was the engagement completed in a timely, efficient manner under the circumstances?"). When viewed in context, the services

reflected in the Application were reasonable, necessary, appropriately staffed, and were critical to enabling the Committee to meet the Debtors' and Consenting Creditors' accelerated timeline and litigate the complex financial issues presented at the Confirmation Hearing.

A. AlixPartners' Hourly Rates Are Reasonable, Consistent with Market Practice, and Were Approved By The Court

17. The Objection's assertion that AlixPartners' hourly rates are unreasonable is unsupported and contrary to the record in these Chapter 11 Cases, and the prevailing hourly rates for leading restructuring advisory firms in large chapter 11 cases.

18. As an initial matter, it is far too late for the Reorganized Debtor to challenge the hourly rates AlixPartners charged in these Chapter 11 Cases. AlixPartners' compensation structure was fully disclosed in its retention application and expressly approved by this Court in the *Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* (the "Retention Order") [Docket No. 644], which provides that "AlixPartners' compensation terms set forth in the Engagement Letter, including, without limitation, the Fee and Expense Structure, are approved." Retention Order ¶ 5. Such approval at the time of AlixPartners' retention supports the reasonableness of AlixPartners' fee structure, and the Objection's attempt to challenge those rates now, without identifying any change in circumstances or other basis to revisit the Court's prior approval, lacks merit.

19. Further, AlixPartners' rates are consistent with the other bankruptcy financial advisory firms, including the financial advisory firm hired by the Debtors in these Chapter 11 Cases. The Bankruptcy Code directs courts to consider "the customary compensation charged by comparably skilled practitioners in cases other than cases under this title." 11 U.S.C. § 330(a)(3)(F). Consistent with that standard, the appropriate benchmark for evaluating

AlixPartners' rates is the market for comparable restructuring advisory services, not isolated averages or the generalized "industry data" cited in the Objection.

20. AlixPartners' rates fall within the market ranges charged by comparable restructuring advisory firms during the relevant period. For example, publicly disclosed restructuring advisory rates for the leading firms in the industry during 2025 reflected the following ranges:[9]

Alvarez & Marsal Rates

Title	Hourly Rate
Managing Director	$1100-$1575
Director	$850-$1100
Associate	$625-$825
Analyst	$450-$600

FTI Rates

Title	Hourly Rate
Senior Managing Director	$1270-$1580
Directors/Senior Directors/Managing Directors	$940-$1195
Consultants/Senior Consultants	$535-$850
Administrative Paraprofessional	$195-$395

AlixPartners Rates

Title	Hourly Rate
Partner & Managing Director/Partner	$1225-$1540
Director/Senior Vice President	$850-$1150
Vice President	$650-$835
Consultant/Analyst	$250-$640

21. These ranges demonstrate that AlixPartners' rates are well within the market for comparable restructuring professionals. The Objection's reliance on a purported blended average does not establish that AlixPartners' rates are excessive, particularly given the nature of the services performed and the senior expertise required for the Committee's workstreams.

22. Courts in complex Chapter 11 cases routinely approve rates comparable to those approved here. *See, e.g.*, *In re Office Properties Income Trust*, No. 25-90530 (CML) (Bankr. S.D. Tex. Dec. 15, 2025) (approving retention of AlixPartners at comparable rates); *In re Anthology Inc.*, No. 25-90498 (ARP) (Bankr. S.D. Tex. Dec. 8, 2025) (same); *In re Ascend Performance Materials Holdings Inc.*, No. 25-90127 (CML) (Bankr. S.D. Tex. July 9, 2025) (same); *In re Docudata Solutions, L.C.*, No. 25-90024 (CML) (Bankr. S.D. Tex. Apr. 17, 2025) (same); *In re Party City Holdco Inc.*, No. 24-90621 (ARP) (Bankr. S.D. Tex. Feb. 12, 2025) (same); *In re Intrum*

[9] While these tables reflect accurate rate ranges of the firms listed according to publicly available documents, titles are not directly transferrable between and among the firms.

AB, No. 24-90575 (CML) (Bankr. S.D. Tex. Jan. 3, 2025) (same). Courts likewise approve comparable rates for other leading restructuring advisors, including Alvarez & Marsal and FTI Consulting. *See, e.g.*, *In re Pine Gate Renewables, LLC*, No. 25-90669 (CML) (Bankr. S.D. Tex. Dec. 16, 2025) (approving retention of Alvarez & Marsal at comparable rates); *In re First Brands Group, LLC*, No. 25-90399 (CML) (Bankr. S.D. Tex. Dec. 8, 2025) (same); *In re Linqto TX, LLC*, No. 25-90186 (ARP) (Bankr. S.D. Tex. Sept. 17, 2025) (same); *In re Ascend Performance Materials Holdings Inc.*, No. 25-90127 (CML) (Bankr. S.D. Tex. June 12, 2025) (approving retention of FTI Consulting at comparable rates). The Objection offers no evidence demonstrating that the rates approved by this Court and charged by AlixPartners fall outside the range charged by similarly situated professionals.

23. Therefore, AlixPartners' rates reflect standard market pricing for senior restructuring advisory services in complex Chapter 11 cases and fully satisfy the standards set forth in section 330 of the Bankruptcy Code.

B. Comparing Financial Advisor Rates to Attorney Rates Is Improper

24. The Objection's attempt to compare the billing rates of AlixPartners' professionals to those of legal counsel is fundamentally flawed. Section 330 of the Bankruptcy Code requires comparison to "comparably skilled practitioners," not professionals performing entirely different functions.

25. Financial advisors and attorneys perform distinct but complementary roles in chapter 11 proceedings. Financial advisors provide services such as liquidity analysis, financial diligence, valuation analysis, business plan evaluation, and expert testimony. These services require specialized financial and operational expertise that differs materially from the legal services provided by counsel. Accordingly, courts evaluate the reasonableness of financial advisory rates by reference to other restructuring advisory firms, not attorneys. *See, e.g.*, *In re*

Pilgrim's Pride Corp., 690 F.3d 650, 655 (5th Cir. 2012) (recognizing that market-based compensation for professionals is appropriate under section 330). When evaluated against the appropriate benchmark (rates charged by other restructuring advisory firms) AlixPartners' rates fall within the prevailing market range.

C. The Staffing Structure was Appropriate Given the Scope and Complexity of the Engagement

26. The Objection's criticism of AlixPartners' staffing levels reflects an improper attempt to second-guess professional judgment, rather than evaluating whether the services were reasonable when rendered. The Objection further reflects an improper understanding of these Chapter 11 Cases and how top-tier financial advisory firms, such as AlixPartners, approach Chapter 11 cases altogether.

27. The factors under section 330(a)(3) support the full allowance of AlixPartners' fees set forth in the Application. The services that AlixPartners rendered were beneficial toward assisting the Committee in discharging its fiduciary duties and AlixPartners' work was in furtherance of the interests of unsecured creditors. As noted above, this was a complex case barreling toward confirmation on an accelerated timeline. Understanding and evaluating a company with operations in 48 states, subject to a pervasive regulatory regime, and with billions in revenues and debt, required the expenditure of senior staff with specific skill sets and expertise. Therefore, this required senior-level restructuring expertise, including financial diligence, evaluation of a complex DIP structure, business plan analysis, preparation of expert reports and testimony. As a result, the engagement necessarily required significant involvement from experienced professionals, including Partner and Managing Director, Partner, and Director-level personnel. The composition of the AlixPartners team reflected the nature of the work required to

advise the Committee during a highly compressed Chapter 11 process that culminated in a contested confirmation hearing involving complex valuation and business plan issues.

28. The Reorganized Debtors do not criticize AlixPartners' skill and expertise in the bankruptcy field and instead attempt to criticize the fees based on staffing despite them paying far more to their own financial advisor and investment banker.

29. The Objection's suggestion that the work should have been performed primarily by more junior professionals ignores the reality that the Committee required senior advisory expertise to evaluate the Debtors' projections, analyze complex financial issues, and prepare expert reports and provide expert testimony within the confirmation schedule.

30. Exhibit A attached hereto identifies AlixPartners' core team of professionals who worked on the engagement, their roles, and highlights the key tasks to which they contributed. Exhibit A supports that professionals were assigned specific responsibilities necessary to support the Committee's work in these Chapter 11 Cases.

31. In light of the scope, complexity, and timing of the engagement, the staffing structure employed by AlixPartners was both reasonable and necessary.

D. The Hours Billed Reflect the Work Reasonably Required by the Case

32. The Objection's claim that AlixPartners engaged in "overstaffing" or "gang billing"[10] mischaracterizes the nature of the work performed and selectively cites isolated time entries without considering the broader context of the engagement.

33. AlixPartners employed a team-based approach typical in complex restructuring engagements, consisting of professionals with distinct responsibilities across multiple

[10] The Objection's characterization of coordination calls as "gang billing" is unfounded and relies on a pejorative, invented term rather than any meaningful assessment of whether the participation of the professionals involved was reasonable or necessary.

workstreams. Because these workstreams were often interrelated, including liquidity projections, valuation analysis, investigation of historical transactions, business plan review, and litigation support, coordination among team members was both necessary and efficient.

34. Attendance of team members at certain meetings, including regularly scheduled meetings to ensure that everyone was informed of key facts and relevant data across workstreams, reflected their specific roles in those workstreams and ensured that the Committee and its advisors could receive immediate and informed responses to questions as they arose. Rather than being unnecessary or overbilling, those meetings actually promoted efficiency in the delivery of advisory services.

35. Contrary to the suggestion in the Objection, having team members that fulfill different roles attend key meetings together is often more efficient than requiring separate follow-up communications to relay information to professionals who were not present. In fast-moving chapter 11 cases, such coordination is routine and essential to ensure that consultants remain aligned and able to respond promptly to developments in the case.

36. In reality, the hours billed were commensurate with the work required to analyze the Debtors' business plan, support the Committee's negotiations and litigation efforts, and prepare for the five-day confirmation hearing that ultimately resolved these Chapter 11 Cases. The hours reflected in the Application are consistent with the scope and urgency of that work.

E. AlixPartners' Work Was Complementary to, and Not Duplicative of, Committee Counsel's Work

37. The Objection's assertion that AlixPartners duplicated the work of Committee counsel reflects a fundamental misunderstanding of the distinct roles performed by financial advisors and attorneys in chapter 11 proceedings.

38. When analyzing whether AlixPartners performed services that it should not have, the Court need look no further than the November 20, 2025 testimony of Zul Jamal of Moelis & Company (the Debtors' financial advisor) who testified that as follows:

> (Mr. Shore) Q. Okay. In a case in which -- in a big Chapter 11, is it common for, in your experience, for a financial advisor for a committee to perform valuations?
>
> (Mr. Jamal) A. It might be something they do.

Jamal Nov. 20, 2025 Dep. Tr. 23:13-17.

39. Financial advisors and legal counsel routinely work on the same subject matters such as plan negotiations, disclosure statements, or financing arrangements, but they perform different functions within those workstreams. Financial advisors provide financial, operational, and valuation analysis that informs the Committee's strategic and legal positions, while counsel addresses the legal structure, negotiation, and litigation of those issues. Accordingly, the presence of similar billing category descriptions (e.g., "Plan," "Disclosure Statement," or "DIP Financing") does not indicate duplication of services.

40. For example, while counsel was responsible for drafting pleadings, negotiating legal terms, and litigating issues before the Court, AlixPartners' work focused on financial diligence and analysis, including reviewing the Debtors' financial projections, assessing the proposed DIP financing, evaluating the Debtors' business plan, assessing enterprise value, analyzing creditor recoveries, and providing expert reports and testimony concerning those financial matters. These financial analyses were necessary to inform the Committee's legal strategy and could not have been performed by counsel.

41. Similarly, with respect to matters such as the Restructuring Support Agreement, Plan negotiations, and the Disclosure Statement, counsel addressed the legal structure and documentation of those matters, while AlixPartners analyzed the financial implications of the

proposed transactions, assessed the reasonableness of the Debtors' projections and assumptions, and evaluated the impact of those proposals on creditor recoveries. These roles are inherently complementary.

42. The Objection also overlooks the fact that effective representation of a creditors' committee requires close coordination between financial advisors and counsel, particularly where, as was the case here, the issues presented at confirmation involved complex valuation and business plan disputes. Coordination between advisors and counsel, including attendance at key meetings and hearings, is not duplication, but rather a necessary component of providing informed and effective advice to the Committee.

43. The Objection asserts that it is problematic that multiple AlixPartners professionals attended certain hearings and preparation sessions and further criticizes the presence of both AlixPartners and White & Case at those proceedings. That criticism reflects a misunderstanding of standard practice in complex Chapter 11 cases. Experienced bankruptcy practitioners recognize that each professional serves a distinct role, and that attendance at hearings and related preparation sessions is driven by subject matter expertise and the needs of the engagement. In particular, having multiple professionals present enables real-time support during hearings, facilitates the efficient division of responsibility across discrete issues and workstreams, and ensures that questions arising on different topics can be addressed promptly and accurately. This is especially critical in complex proceedings, where financial, operational, and legal issues are often intertwined and evolve quickly.

44. Attendance by AlixPartners professionals at hearings and strategy sessions was similarly appropriate where those proceedings directly involved financial issues on which AlixPartners was advising the Committee. Indeed, the Debtors' own professionals in these Chapter

11 Cases followed the same approach. Multiple professionals from the Debtors' advisory teams attended key hearings, including those identified in the Objection. For example, professionals from FTI Consulting and Hunton Andrew Kurth attended numerous hearings, including the September 30 hearing cited in the Objection and the confirmation hearing, both firms with multiple representatives present, consistent with the complexity and scope of the issues being addressed.[11]

45. Ultimately, the work performed by AlixPartners provided the financial analysis and expert support necessary for the Committee to evaluate the Debtors' proposals and litigate the complex valuation and business plan issues presented in these cases. Far from duplicating counsel's work, AlixPartners' services enabled the Committee to meet the accelerated confirmation timeline and to effectively discharge its statutory duties.

46. Courts routinely recognize that financial advisors and counsel must work collaboratively on the same issues in Chapter 11 cases, and such coordination is both expected and necessary to ensure that the committee receives informed financial and legal advice.

F. Time Spent Preparing Fee Applications is Compensable and Reasonable

47. Time spent preparing interim and final fee applications is expressly compensable under section 330 of the Bankruptcy Code and the applicable fee guidelines. *See* 11 U.S.C. § 330(a)(6) ("Any compensation awarded for the preparation of a fee application shall be based on the level and skill reasonably required to prepare the application."). Courts consistently recognize that preparing fee applications is a necessary component of a professional's engagement in

[11] *See* FTI Consulting Inc.'s *Application for Final Allowance and Payment of Fees and Expenses as Financial Advisor, Chief Transformation Officer, and Additional Personnel for the Debtors for the Period from August 20, 2025 through December 29, 2025* [Docket No. 1270] and Hunton Andrews Kurth LLP's *First and Final Fee Application of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of August 20, 2025 through December 29, 2025* [Docket No. 1269].

bankruptcy cases and is compensable when reasonable. *See, e.g.*, *In re Spanjer Bros., Inc.*, 203 B.R. 85, 90 (Bankr. N.D. Ill. 1996).

48. During the Final Period, AlixPartners incurred time preparing monthly fee statements for September, October, November, and December 2025, as well as its final fee application. Preparation of these submissions required reviewing and organizing detailed time records, ensuring compliance with the United States Trustee Guidelines, addressing confidentiality considerations, preparing the required schedules and exhibits, and coordinating with counsel regarding the filing of the fee statements.

49. The Objection's suggestion that these efforts were excessive overlooks the detailed reporting requirements imposed by the Bankruptcy Code, the United States Trustee Guidelines, and the Court's fee procedures order. Courts routinely acknowledge that preparing fee applications requires careful review and organization of time entries, compilation of supporting schedules, and preparation of the disclosures necessary to allow the Court and parties in interest to evaluate the reasonableness of the requested compensation. *See, e.g.*, *In re CF & I Fabricators of Utah, Inc.*, 131 B.R. 474, 489 (Bankr. D. Utah 1991).

50. In light of the scope of the engagement and the number of professionals whose time entries were reviewed and summarized, the time incurred in preparing these required pleadings was reasonable.

G. The Time Entries Provide Sufficient Detail to Understand the Work Performed

51. The time descriptions in the Application provide sufficient detail to permit the Court to understand the nature of the services performed, which is the standard required under the Bankruptcy Code and applicable guidelines. *See Matter of Evangeline Ref. Co.*, 890 F.2d 1312, 1326 (5th Cir. 1989). Revised entries, though not required, are attached as Exhibit B. A comparison of the original entries with the updated descriptions demonstrates that the entries included in the Application

already provided sufficient information for the Court and parties in interest to understand the nature of the work performed and evaluate the reasonableness of the services rendered.[12]

H. The Objection is Misleading and AlixPartners' Time Entries Reflect Discrete Tasks and Appropriate Professional Judgment

52. The Objection's criticism of certain time entries as lumping reflects an interpretation of timekeeping standards that is inconsistent with the practical realities of complex restructuring engagements and with the standards typically applied in reviewing professional fee applications.

53. More importantly, the Objection attempts to mislead the Court by misquoting time entries in an attempt to disallow AlixPartners' fees. The Objection paraphrases or rewrites short entries, which obscures the actual language submitted in the Application and prevents a meaningful evaluation of the alleged deficiencies. Where the basis of the Objection revolves around formulistic and precise conveyance of tasks performed in the narrative of a time entry, the Objection's re-writing of entries and including them in a chart with no explanation that they are rewritten can only be characterized as misleading. Objection at ¶ 41.

54. For example, the Objection cites the following purported AlixPartners entry as evidence of "lumping":

9/10/2025	RK	Discussion... re: valuation work stream and staffing; Discussion... re: business plan workstream	0.2

However, the actual entry submitted in the Application states:

[12] The descriptions and numerical references quoted in the Objection do not always reflect the exact language or figures included in the Application. For ease of reference, AlixPartners has included both the Objection's characterization of certain entries and the corresponding entries as they appear in the Application. The same issue arises with respect to certain numerical references throughout the Objection, which vary slightly from the amounts reflected in the filed Application but do not meaningfully affect the substance of AlixPartners' responses.

09/10/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2

55. In their rewritten version, the Reorganized Debtors substitute language that does not appear in the actual time entry and imply that the entry reflects separate discussions regarding distinct matters when, in reality, the entry reflects a single conversation regarding the valuation workstream and related staffing. When evaluated based on the actual entry, there is no lumping concern; the entry describes a discrete task and provides sufficient detail for a twelve-minute discussion.

56. An additional sampling of such entries is shown in the chart below, highlighting the Objection's misplaced argument around alleged "lumping."

Date	**Time Entry as Written in Objection**	**Time Entry as Written in AlixPartners' Application**
9/10/2025	Discussion... re: valuation work stream and staffing; Discussion... re: business plan workstream	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing
10/2/2025	Conduct initial assessment...; compared plan margins to peer benchmarks	Conduct initial assessment of segment-level financials and cost allocations; compared plan margins to historical performance and peer benchmarks.
10/3/2025	Analyze spend data to identify trends, cost drivers, and optimization opportunities	Analyze September 2025 YTD third-party spend data to identify spending trends, cost drivers, and potential opportunities for vendor optimization
10/13/2025	Prepare effectiveness model... estimating potential savings	Prepare organizational effectiveness model for field operations estimating potential savings.

10/29/2025	Integrate initiatives into model; ensured consistency of phasing and costs	Integrate service expense initiatives into unified business-plan financial model; ensured consistency of savings phasing and one-time costs before sending to W&C for review.

57. More broadly, the Objection incorrectly assumes that any entry referencing multiple related topics necessarily constitutes "lumping." That is not the applicable standard. Where a professional performs a single task such as participating in a meeting or conference call, discussion of multiple related issues during that meeting does not transform the entry into multiple tasks requiring separate billing entries.

58. Indeed, attempting to subdivide a single call or meeting into numerous separate entries based on each topic discussed would not meaningfully enhance transparency and would instead create artificial fragmentation of time entries. *In re Harry Viner, Inc.*, 520 B.R. 268, 276 (Bankr. W.D. Wis. 2014) ("[T]here is a law of diminishing returns in requiring separation of every single task or service" and "it would be absurd to require separate time entries for every e-mail—particularly if the subject matters or the nature of the services are the same"). Similarly, entries describing work such as developing a work plan, coordinating strategy, or discussing staffing often reflect related aspects of the same analytical or planning session. These activities are appropriately recorded together where they occur as part of a single working session rather than as separate, unrelated tasks. When viewed in context, the time entries included in the Application are appropriate and provide sufficient detail to permit the Court and parties in interest to evaluate the nature and reasonableness of the services performed.

I. The Challenged Tasks Reflect Compensable Professional Work, Not Clerical Activity

59. The Objection incorrectly characterizes certain time entries as clerical or ministerial based solely on the nature of the task described or the professional performing it. In reality, the

entries reflect work that required familiarity with the issues in these Chapter 11 Cases and the exercise of professional judgment. Therefore, such tasks constitute compensable professional services under section 330 of the Bankruptcy Code.

60. Courts consistently distinguish between purely clerical functions such as basic scheduling, copying, or filing, and tasks that require knowledge of the case, evaluation of information, or coordination of substantive workstreams. The latter are properly compensable professional services. *See, e.g.*, *In re CF & I Fabricators of Utah, Inc.*, 131 B.R. 474, 488–89 (Bankr. D. Utah 1991). The tasks identified in the Objection constitute compensable professional work. For example, activities such as preparing and organizing data room materials, coordinating diligence materials, and establishing distribution lists for substantive communications required familiarity with the relevant workstreams and the professionals involved in those efforts. These tasks were integral to facilitating the Committee's diligence, financial analysis, and coordination among advisors.

61. In complex Chapter 11 proceedings involving extensive diligence and multiple professional teams, such work is often performed by members of the advisory team who are familiar with the case and the underlying issues. Assigning these tasks to professionals with knowledge of the engagement ensures that materials are organized correctly, distributed to the appropriate parties, and integrated efficiently into the advisory workstreams.

62. Accordingly, the entries identified in the Objection reflect reasonable professional services performed in support of the Committee's engagement and do not constitute non-compensable clerical work.

J. <u>The Expenses Incurred Were Reasonable and Reimbursable</u>

63. The expenses for which AlixPartners seeks reimbursement were incurred in connection with providing necessary services to the Committee and are of the type routinely

reimbursed to retained professionals in chapter 11 cases. Section 330(a)(1)(B) of the Bankruptcy Code expressly authorizes reimbursement for "actual, necessary expenses," and the expenses reflected in the Application are entirely consistent with that standard. 11 U.S.C. § 330(a)(1)(B)

64. First, the Objection challenges the purchase of certain third-party research reports, suggesting that AlixPartners' industry experts should have obviated the need for such materials. This criticism misunderstands the role of independent market data in financial advisory work performed in connection with business plan and valuation analysis. The reports at issue consisted of third-party market research analyzing the current state of the market and projected growth through 2030–2031 for each of the Debtors' principal business segments, including non-emergency medical transportation, personal care services, and remote patient monitoring. These reports provided objective industry data regarding market size, growth trends, and competitive dynamics. Incorporating independent market research into financial analysis is standard practice in business plan review and performance assessment engagements. Advisors routinely combine external market data with internal analytical tools and experience in order to calibrate assumptions, evaluate management projections, and develop informed conclusions regarding industry outlook and business performance.

65. Here, the reports were particularly relevant because they provided independent support for evaluating the Debtors' market growth assumptions and business plan projections. The information contained in the reports informed AlixPartners' analysis of the Debtors' projections and provided objective evidentiary support for the conclusions reflected in AlixPartners' expert rebuttal report concerning the Debtors' business plan and market outlook.[13] While AlixPartners

[13] It should be noted that AlixPartners requested that the Debtors provide access to their subscription-based research resources. In some instances they did, which saved the estate money, and in some cases they did not, which required AlixPartners to purchase certain research reports.

has broader access to market trends and industry research at the US/national or global level that can provide general overview and outlook for a healthcare sub-sector, it does not include these state/market-level drivers, regulations, competitive dynamics, and related nuances. AlixPartners routinely relies on these third-party market research reports, which it charges to the client benefiting from that resource, as these are more tailored to the client's sub-sector/market focus. This is a standard practice in the consulting and advisory industry.

66. As such, AlixPartners' expenses associated with research reports were both reasonable and necessary to the work performed. The data accessed and utilized by AlixPartners in formulating the expert reports and supporting expert conclusions was reliable and necessary, and, had AlixPartners failed to utilize such current data, its expert opinions would be susceptible to attack on that very basis.

67. Second, the Objection also challenges certain lodging expenses in New York City and Houston as "luxury" accommodations. That characterization is incorrect as evidenced by the Debtors' professionals using the same accommodations. AlixPartners also voluntarily reduced actual lodging expenses, resulting in an approximate $3,200 reduction before submission of the Application. The Objection also questions why certain professionals incurred lodging expenses in New York City when AlixPartners maintains an office there. Those expenses were not incurred for routine office visits but instead related directly to matters in these Chapter 11 Cases, including in-person settlement discussions, and preparation for and participation in the deposition of Marc Brown. Given the nature and timing of those matters, travel and lodging were necessary for AlixPartners professionals who are not based in New York City in order to support the Committee's work during critical stages of the case. AlixPartners staffs its engagements with the

best possible expertise and, in this instance, the AlixPartners team was composed of individuals from more than one of AlixPartners' offices.

68. In light of the scope and demands of the engagement, the expenses incurred by AlixPartners were reasonable, necessary, and of the type routinely reimbursed to professionals retained in Chapter 11 cases.

K. Post-Effective Date Fees Are Limited to the Estimated Amount

69. AlixPartners incurred post-effective date fees and, consistent with its Application, invoiced $25,000 for such services, which represents the lesser of the $25,000 estimated amount and the actual, reasonable, and necessary fees incurred related to preparation of monthly fee statements and the Application.

70. Post-effective date fees are regularly approved by courts in Chapter 11 cases. *See, e.g.*, *In re Ascend Performance Materials Holdings Inc.*, No. 25-90127 (CML) (Bankr. S.D. Tex. Feb. 18, 2026); *In re Benefytt Techs., Inc.*, No. 23-90566 (CML) (Bankr. S.D. Tex. Dec. 8, 2023); *In re CBL & Assocs. Props., Inc.*, No. 20-35226 (DRJ) (Bankr. S.D. Tex. Dec. 30, 2021); *In re Chesapeake Energy Corp.*, No. 20-33233 (DRJ) (Bankr. S.D. Tex. Apr. 21, 2021); *In re EP Energy Corp.*, No. 19-35654 (MI) (Bankr. S.D. Tex. Dec. 23, 2020); *In re CARBO Ceramics Inc.*, No. 20-31975 (MI) (Bankr. S.D. Tex. July 28, 2020); *In re New Rite Aid, LLC*, No. 25-14861 (MBK) (Bankr. D.N.J. Feb. 19, 2026); *In re Liberated Brands LLC*, No. 25-10168 (JKS) (Bankr. D. Del. Aug. 11, 2025); *In re Accuride Corp.*, No. 24-12289 (JKS) (Bankr. D. Del. June 17, 2025); *In re Rite Aid Corp.*, No. 23-18993 (MBK) (Bankr. D.N.J. Dec. 5, 2024); *In re SAS AB*, No. 22-10925 (MEW) (Bankr. S.D.N.Y. Dec. 4, 2024); *In re Legacy IMBDS, Inc. (f/k/a iMedia Brands, Inc.)*, No. 23-10852 (KBO) (Bankr. D. Del. July 1, 2024); *In re Boy Scouts of Am. and Delaware BSA, LLC*, No. 20-10343 (LSS) (Bankr. D. Del. Oct. 17, 2023); *In re Exide Holdings, Inc.*, No. 20-11157 (CSS) (Bankr. D. Del. Jan. 8, 2021).

71. The invoice reflecting AlixPartners' post-effective date fees does not include any fees incurred in defending AlixPartners' fee applications in these Chapter 11 Cases and is attached as Exhibit C (the "Invoice"). The balance of the Invoice remains outstanding and subject to approval as part of the Application. This is not at odds with *In re ASARCO, L.L.C.* because the post-effective date fees only relate to preparation of monthly fee statements and this Application, not defending the Application against objections. *See* 751 F.3d 291, 299 (5th Cir. 2014).

WHEREFORE, AlixPartners, LLP respectfully requests that the Court (i) overrule the Objection in its entirety; (ii) approve the Application and allow the compensation and reimbursement of expenses requested therein; and (iii) grant such other and further relief as the Court deems just and proper.

Dated: April 3, 2026

/s/ David MacGreevey
AlixPartners, LLP

Verification

I, David MacGreevey, hereby affirm on this 3rd day of April, 2026, under penalty of perjury, that the foregoing is true to the best of my knowledge, information and belief, and I understand that this Reply of AlixPartners, LLP to the Objection to Its Final Fee Application will be filed in the United States Bankruptcy Court for the Southern District of Texas in response to the Objection to Final Fee Application Filed by AlixPartners, LLP and in further support of the Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through December 29, 2025.

/s/ David MacGreevey

By: David MacGreevey

Certificate of Service

I hereby certify that on April 3, 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.

/s/ Charles R. Koster

By: Charles R. Koster

EXHIBIT A

AlixPartners Personnel[1]	Title in 2025	Key Tasks Performed by Core Team of Professionals
David MacGreevey	Partner & Managing Director	Performed significant services related to Chapter 11 Case matters including court hearings, presentations to the Committee and general financial due diligence • Engagement lead and responsibility for all AlixPartners' engagement workstreams • Advised Committee on overall case strategy, settlement discussions, and key Committee court filings • Provided testimony on DIP facility including detailed review of comparable DIP financings • Analyzed liquidity under different scenarios, assisted with business plan diligence and supported valuation work
Kathryn B McGlynn	Partner & Managing Director	Performed services related to, among other things, Chapter 11 Case matters including court hearings, presentations to the Committee and general financial due diligence • Reviewed and provided comments on first day motions • Assisted with preparation of Committee materials on Statement and Schedules
Marc Brown	Partner & Managing Director	Performed significant services related to Valuation (including preparation of expert report) • Served as expert witness and provided expert report on valuation
Greg Magrisi	Partner & Managing Director	Performed significant services related to Business Plan (including preparation of expert report) • Served as expert witness and provided expert report on business plan • Reviewed, analyzed, and responded to the Debtors' business plan and financial projections with alternative growth hypotheses and cost savings measures
Christopher Rubel	Partner	Performed significant services related to Investigation into Potential Causes of Action • Investigated and evaluated potential causes of action related to pre-petition financing transactions, including quantifying potential claims • Conducted periodic valuations and performed prepetition solvency analyses in connection with claims investigation • Assisted in developing and finalizing the valuation expert report • Coordinated trial preparation, including deposition preparation, developing and drafting direct testimony scripts and exhibits
Johnny Lee	Partner	Performed significant services related to Business Plan (including preparation of expert report) • Served as subject matter resource for healthcare restructuring with interim CFO experience in home care, senior care, managed long-term care contracting and transportation contracting • Assisted in development of expert report and testimony
Ash Panda	Director	Performed significant services related to the Business Plan (including preparation of expert report) • Reviewed, analyzed, and responded to the Debtors' business plan and financial projections with alternative growth hypotheses and projections that resulted in an opposing expert report • Analyzed Debtors' revenue and customer contracts, business operations across the three segments and cost structure relative to industry benchmarks to identify Revenue and EBITDA improvement opportunities

[1] Chart reflects any AlixPartners professional billing in excess of $47k on the engagement; captures 97% of total fees billed.

AlixPartners Personnel[1]	Title in 2025	Key Tasks Performed by Core Team of Professionals
		• Coordinated with the valuation team on key inputs and parameters (e.g., revenue retention, margin improvement, market growth, capex assumptions) required for their valuation report
Joel Amico	Director	Performed significant services related to Chapter 11 Case matters including court hearings, presentations to the Committee and general financial due diligence
		• Responsible for coordination across AlixPartners' team for all workstreams and managed day to day matters • Assisted valuation and business plan teams with diligence and support including participating in interviews and depositions
Matthew Root	Director	Performed significant services related to Valuation (including preparation of expert report)
		• Reviewed and analyzed the Moelis valuation report and related materials • Performed valuation research and analysis, including review and analysis of market data, guideline company and guideline transaction metrics, discount rates, and cash flow forecasts • Assisted in developing and finalizing the valuation expert report and preparation for the valuation expert depositions and the confirmation hearing, including preparation of demonstratives
Ryan Komendowski	Director	Performed significant services related to Valuation (including preparation of expert report)
		• Reviewed, analyzed, and responded to the plan valuation from Moelis which ultimately resulted in an opposing expert report • Recreated and analyzed the plan recovery waterfall assuming changes made to the plan, information obtained from the Debtors', or scenarios requested by counsel for various litigation outcomes
Matthew D Gates	Director	Performed significant services related to Chapter 11 Case matters including court hearings, presentations to the Committee and general financial due diligence
		• Analyzed Debtors First Day Motions, Statement and Schedule and retention applications • Analyzed claims and estimate GUC sizing and assisted with DIP comparables
Iain Nelson	Director	Performed significant services related to Business Plan (including preparation of expert report)
		• Reviewed IT components of the business plan to identify areas for further cost optimization and refinement • Identified cost reduction opportunities across the IT department based on data available • Provided input to expert report documenting potential cost optimization initiatives
Chase Hood	Senior Vice President	Performed significant services related to (i) Chapter 11 Case matters including court hearings, presentations to the Committee and general financial due diligence and (ii) DIP financing and liquidity analysis
		• Assisted all Chapter 11 matters including case developments, review of first day motions, review of Statements and Schedules, Plan and settlement related analyses; monitored all other court filings and prepared updates to the Committee • Assisted with contested DIP hearing including preparation of DIP comps analysis, sensitivity and scenario analysis of DIP forecast and cash runway, preparation for and attendance of DIP related depositions and hearings • Performed various financial analysis including analysis of cash flow forecasting, evaluating various liquidity and emergence scenarios, estimating GUC sizing and recovery under various scenarios and proposals
Susan Clark		Performed significant services related to Business Plan (including preparation of expert report)

AlixPartners Personnel[1]	Title in 2025	Key Tasks Performed by Core Team of Professionals
	Senior Vice President	• Conducted detailed overhead cost diagnostics and benchmarking to identify and quantify savings opportunities in corporate support functions (e.g., Finance, Sales, etc.) • Developed and refined cost-savings levers (e.g., compensation, headcount, and support-function efficiency), including high-level quantification and supporting analytical rationale
Thomas G Prince	Senior Vice President	Performed significant services related to (i) Chapter 11 Case matters including court hearings, presentations to the Committee and general financial due diligence and (ii) Business Plan (including preparation of expert report) • Led or supported numerous chapter 11 related analyses including analysis of claims pool, DIP financing, advisor retentions, first day motions, schedules and statements, Plan related analyses, liquidity and settlement terms • Supported analysis of the Debtors' business plan through modeling support and analysis of historical and projected financial performance • Performed ad hoc tasks and analyses to support other workstreams such as valuation and investigation as needed
John Tutty	Senior Vice President	Performed significant services related to Investigation into Potential Causes of Action • Researched and analyzed the facts and circumstances around pre-petition financing transactions, including the up tier transaction • Performed research on market data for financial results, valuations and debt pricing of comparable companies to support the valuation analysis • Performed various financial analysis including: analysis of vendor spend, evaluating various liquidity and emergence scenarios, recovery under various scenarios and proposals, and ad-hoc analyses at the request of counsel
Jyoji Morimoto	Senior Vice President	Performed services related to Valuation (including preparation of expert report) • Searched for comparables for each business segment • Performed market research on the industries ModivCare was active in
Lucas Lovatto	Vice President	Performed significant services related to Business Plan (including preparation of expert report) • Built independent service expense baselines across all business units using bottom-up Accounts Payable and Census data • Performed diagnostics on historical and projected trends to identify structural inefficiencies and evaluate Debtor's assumptions • Conducted detailed operational and vendor analyses to isolate discrete service cost and gross margin improvement levers • Quantified value creation opportunities by converting operational levers into run-rate service expense savings by segment

EXHIBIT B

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
Matter 1.1.1: Planning, Coordination and Case Management					
9/10/2025	KBM	Prepare case set-up items	Prepare case set-up items	Organize various initial workstreams and assign team members accordingly	0.9
9/10/2025	KBM	Email to internal team re: case workstreams and next steps	Email to internal team re: case workstreams and next steps	Email to internal team re: analysis of first day motions	0.6
9/11/2025	GM	Prepare for call for ModivCare re: diligence	Prepare for call for ModivCare re: diligence	Prepare for UCC Introduction meeting including process and data requirement overview	0.3
9/24/2025	AP	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	CH	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	CC	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	DM	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
9/24/2025	JA	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	KBM	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	LL	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	MDG	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	RK	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
9/24/2025	SC	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
9/24/2025	TGP	Call... re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: deposition prep and business plan review	0.6
10/6/2025	JA	Draft of key items and workplan required to get to Confirmation	Draft of key items and workplan required to get to Confirmation	Draft of Committee call agenda, business plan diligence update, key valuation diligence and other potential resources required for Confirmation hearing	1.1
10/6/2025	Group	(12 identical entries) Call... re: ongoing workstreams and next steps	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps (0.5)	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: materials for Committee call and due diligence requests and status	6
10/7/2025	Group	(11 identical entries) Call... re: priority tasks and next steps	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps (0.6)	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: diligence for various adversary complaints	6.6

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
10/14/2025	Group	(11 identical entries) Call... re: priority tasks and next steps	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps (0.5)	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: diligence questions for upcoming Debtor interviews and UHC settlement	5.5
10/21/2025	Group	(12 identical entries) Call... re: strategy and next steps	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps (0.7)	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: settlement discussions, GUC pool analysis and open diligence requests	8.4
10/28/2025	Group	(12 identical entries) Call... re: priority tasks and next steps	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps (0.7)	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: open diligence requests, expert reports status and deposition prep	8.4
11/18/2025	Group	(8 identical entries) Call... re: strategy and next steps	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	4.1
11/18/2025	JA	Draft key workstream tracker and identify of update to priority deliverables	Draft key workstream tracker and identify of update to priority deliverables	Draft of update to Alix team re settlement discussions, GUC pool, expert report status, deposition schedule and other case matters	0.5

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
12/2/2025	Group	(8 identical entries) Call... re: priority tasks and next steps	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps (0.4)	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: Confirmation trial prep and analysis on potential implications of outcome on recovery	3.2
Matter 1.1.9: Business and Strategic Plan					
10/1/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to customer contracts and historical revenue of RPM re: Debtors' business plan forecast and projections	2.8
10/2/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to operations and cost structure of NEMT re: Debtors' business plan forecast and projections	2.7
10/3/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to customer contracts and historical revenue of NEMT re: Debtors' business plan forecast and projections	2.4
10/6/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to customer contracts and historical revenue of PCS re: Debtors' business plan forecast and projections	2.6
10/7/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to operations and cost structure of PCS re: Debtors' business plan forecast and projections	1.8
10/8/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to operations and cost structure of RPM re:	2.9

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
				Debtors' business plan forecast and projections	
10/9/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to historical Capex spend in PCS re: Debtors' business plan forecast and projections	1.5
10/10/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to historical Capex spend in NEMT re: Debtors' business plan forecast and projections	2.6
10/13/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to historical Capex spend in RPM re: Debtors' business plan forecast and projections	2.8
10/14/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to Management historical EBITDA forecasts vs actuals for NEMT re: Debtors' business plan forecast and projections	1.3
10/15/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to Management historical EBITDA forecasts vs actuals for PCS re: Debtors' business plan forecast and projections	2.5
10/16/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to Management historical EBITDA forecasts vs actuals for RPM re: Debtors' business plan forecast and projections	1.3
10/17/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to Management's performance improvement actions in NEMT re: Debtors' business plan forecast and projections	1.4

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
10/20/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to Management's performance improvement actions in PCS re: Debtors' business plan forecast and projections	1.2
10/21/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to Management's performance improvement actions in RPM re: Debtors' business plan forecast and projections	0.7
11/12/2025	LL	Review open business plan questions (No context)	Review open business plan questions (No context)	Review and resolve outstanding business plan (components of NEMT and PCS business units service expense portion) issues in preparation for expert deposition	0.3
11/13/2025	AP	Review discovery documents for each segment	Review discovery documents for each segment	Review discovery documents related to customer contract renewal history in NEMT re: Debtors' business plan forecast and projections	1.1
11/17/2025	SC	Prepare for deposition, re: Business Plan diligence (Vague session)	Prepare for deposition, re: Business Plan diligence (Vague session)	Conducted detailed review of Debtors' documentation to assess the support for Business Plan savings assumptions	2.4
11/20/2025	LL	Review documents and materials for deposition preparation	Review documents and materials for deposition preparation	Review expert report, market research, backup analyses, and produced documents to prepare for deposition questioning and cross-examination topics	0.7
Matter 1.1.11: Financial and Other Diligence					
9/11/2025	JL	Review case filings to prepare for kick off	Review case filings to prepare for kick off	Prepare questions/follow ups for kick off meeting	0.6
9/11/2025	JL	Review initial request list	Review initial request list	Review initial request list for priority and descriptions	0.6

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
9/15/2025	KBM	Review information available in data room	Review information available in data room	Review information available in data room re: first day motions	0.3
9/24/2025	KBM	Review outstanding information requests	Review outstanding information requests	Review outstanding initial diligence requests related to various financial analyses	0.4
10/1/2025	JA	Review various data room files and provide summary overview	Review various data room files and provide summary overview	Review of data room files related to vendor payments and weekly cash flow reports and incorporate into response to W&C	0.8
10/3/2025	JA	Review various data room documents re prep for upcoming hearing	Review various data room documents re prep for upcoming hearing	Review of data room and other files received from Debtors re weekly cash flow forecast and liquidity runway and correspond with W&C for DIP hearing	2
10/6/2025	MDG	Review open items on diligence list	Review open items on diligence list	Review of open items on diligence list re UHC settlement, ordinary course professionals and SOFA/Schedules	1
10/7/2025	MDG	Review docket for various debtor filings	Review docket for various debtor filings	Review docket re Disclosure Statement, liquidation analysis and scheduling matters	0.5
10/9/2025	KBM	Review outstanding information requests and next steps	Review outstanding information requests and next steps	Review list of outstanding information requests and suggested follow-up with the Debtors	0.6
10/9/2025	MDG	Review contracts in Datasite dataroom	Review contracts in Datasite dataroom	Review individual customer contracts in data room re sale obligations	1
10/14/2025	JA	Review historical diligence info re prior forecasts	Review historical diligence info re prior forecasts	Review of historical cash flow forecast to identify changes to current liquidity outlook	0.5
11/3/2025	KBM	Review updates re: outstanding information requests	Review updates re: outstanding information requests	Review responses to outstanding information requests and critical information that remains outstanding	0.4
11/4/2025	JA	Review various data room documents re historical financial projections	Review various data room documents re historical financial projections	Review of historical financial projections/liquidity forecasts from data room to evaluate minimum liquidity assumptions	0.5

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
11/6/2025	JA	Review various documents re projections per request from W&C	Review various documents re projections per request from W&C	Analyze historical projections from March 2025, August 2025 and Disclosure Statement to identify changes	1
11/11/2025	KBM	Review updates re: outstanding diligence requests	Review updates re: outstanding diligence requests	Review responses to outstanding diligence requests and critical information that remains outstanding	0.2
11/13/2025	KBM	Review updates re: outstanding diligence requests	Review updates re: outstanding diligence requests	Review responses to outstanding diligence requests and critical information that remains outstanding	0.3
11/24/202	JA	Review various claims and causes of action listed re Plan Settlement	Review various claims and causes of action listed re Plan Settlement	Reconcile causes of action listed in Schedules and Plan Supplement	0.6
12/4/2025	JA	Prepare for upcoming UCC Committee meeting (Generic prep)	Prepare for upcoming UCC Committee meeting (Generic prep)	Review of materials to present during Committee call including liquidity status and Confirmation matters	0.5
Matter 1.20: Fee Applications & Fee Statements					
10/8/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.2
10/15/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.2
10/22/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.3
10/28/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.3

Date	Professional	Time Entry as Written in Objection	Time Entry as Written in AP Final Fee Application	Revised with Additional Detail	Hours
11/11/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.2
11/19/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.2
11/25/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.2
12/3/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.3
12/9/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.3
12/18/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.3
12/23/2025	LMB	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners weekly fee estimates	Prepare AlixPartners' weekly fee estimates reflecting ongoing fees and hours for the engagement team to provide to the Debtors	0.3

EXHIBIT C

AlixPartners

March 10, 2026

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Inv. No.: Post Effective Date Fees
Client: 20015424Pa0001 Federal Tax ID: 38-3637158

For Professional Services: December 30, 2025 Through February 28, 2026

Current Charges:		**Hours**	**Rate**		**Amount**
David MacGreevey	Partner & Managing Director	3.9	$1,510	$	5,889.00
Joel Amico	Director	6.7	$1,175		7,872.50
Kaitlyn Sundt McClarren	Director	0.8	$750		600.00
Lisa Marie Bonito	Vice President	29.6	$610		18,056.00
Total Hours & Fees		**41.0**		**$**	**32,417.50**
Reduction[1]					(7,417.50)
Subtotal				**$**	**25,000.00**
Total Amount Due					**USD 25,000.00**

[1] Per its final fee application, AlixPartners agreed to invoice the lesser of either actual, reasonable and necessary fees or $25,000.00 for the Post-Effective Date Fees

Please reference the invoice number noted above on any payment remittance. Thank You.

If Remitting in any currency:
Account Name: AlixPartners LLP
Account Number: 8670119732
Bank Name: Bank of America
ACH ABA/Routing & Transit: 071 000 039
Wire ABA/Routing & Transit: 026 009 593
SWIFT: BOFAUS3N

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Project Code	Description		Amount
20015424PA0001.1.20	Fee Applications & Fee Statements	$	32,417.50
Total Fees Incurred		**USD**	**32,417.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
01/05/2026	LMB	Prepare professional fees for December 2025 Monthly Fee Statement	2.3
01/07/2026	LMB	Prepare professional fees for December 2025 Monthly Fee Statement	2.2
01/08/2026	LMB	Prepare professional fees for December 2025 Monthly Fee Statement	2.2
01/09/2026	JA	Review of December professional fees for confidentiality and to conform to U.S. Trustee guidelines	1.7
01/09/2026	LMB	Prepare monthly invoices for collection. Review court docket. Email with J. Amico (AlixPartners) re: final fee application	0.5
01/12/2026	JA	Review December 2025 monthly fee statement	0.5
01/12/2026	LMB	Continue to prepare professional fees for December 2025 monthly fee statement.	1.2
01/12/2026	LMB	Analyze expenses for December monthly fee statement	0.6
01/13/2026	JA	Provide comments to December 2025 monthly fee statement	0.5
01/13/2026	LMB	Analyze expenses for December monthly fee statement	1.0
01/13/2026	LMB	Review Court docket. Begin preparation of schedule workbook for Final Fee Application. Begin to prepare initial draft of Final Fee Application.	3.8
01/13/2026	LMB	Prepare schedule/exhibit workbook for December 2026 Monthly Fee Statement	0.8
01/13/2026	LMB	Prepare 4th Monthly Fee Statement (December 2025), supporting schedules and exhibits	1.8
01/14/2026	DM	Review and comments on December monthly fee statement	0.8
01/14/2026	KSM	Review draft December monthly fee statement	0.3
01/14/2026	LMB	Revise and fInalize 4th Monthly Fee Statement (December 2025), supporting schedules and exhibits; email to counsel attaching Monthly Fee Statement	1.0
01/14/2026	LMB	Continue to prepare Final Fee Application, supporting schedules and exhibits. Update fee application summary chart	2.3
01/15/2026	JA	Prepare Final Fee Application	2.5
01/15/2026	LMB	Continue to prepare Final Fee Application, supporting schedules and exhibits.	2.8
01/16/2026	DM	Review, revise and provide comments on first draft ModivCare final fee application	1.0
01/16/2026	KSM	Revise Final Fee Application	0.5
01/16/2026	LMB	Revise ModivCare Final Fee Application	2.1
01/18/2026	LMB	Revise Combined Third Interim and Final Fee Application, supporting schedules and exhibits. Email to J. Amico (AlixPartners) re: final fee applicatiion	1.0
01/20/2026	DM	Review and further revise the revised ModivCare final fee application	0.9
01/20/2026	JA	Review and revise Final Fee Application	1.5
01/20/2026	LMB	Review emails from D. MacGreevey and J. Amico (AlixPartners) re: final fee application	0.4
01/21/2026	DM	Discussion with S. Greissman (W&C) regarding ModivCare final fee application	0.2
01/21/2026	LMB	Continued preparation of Final Fee Application. Compile exhibits to final fee application	1.3
02/06/2026	LMB	Update fee application summary chart.	0.3
02/08/2026	LMB	Revise Final Fee Application	0.7
02/10/2026	LMB	Revise Final Fee Application. Compile exhibits to Final Fee Application	0.8
02/11/2026	DM	Review and revise ModivCare final fee application	1.0
02/11/2026	LMB	Finalize Final Fee Application. Prepare proposed Order Awarding Final Fees. Email to W&C attaching Final Fee Application for filing on the Court docket	0.5
Total Professional Hours			**41.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,510	3.9	$	5,889.00
Joel Amico	$1,175	6.7		7,872.50
Kaitlyn Sundt McClarren	$750	0.8		600.00
Lisa Marie Bonito	$610	29.6		18,056.00
Total Professional Hours and Fees		**41.0**	**$**	**32,417.50**

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)
	)	

MOTION OF CRESA, LLC TO ENFORCE THE FINAL FEE ORDER, COMPEL PAYMENT OF COURT-APPROVED FEES, AND FOR RELATED RELIEF

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Cresa, LLC ("Cresa"), court-approved and retained real estate consultant and advisor to the above-captioned reorganized debtors (prior to the Effective Date,[2] collectively the "**Debtors**" and, after the Effective Date, collectively, the "**Reorganized Debtors**"), hereby moves (the "**Motion**") for entry of an order enforcing the *Final Order Allowing Compensation and Reimbursement of Expenses of Cresa, LLC* entered on March 4, 2026 [Dkt. 1348] (the "**Final Fee Order**") and compelling the Reorganized Debtors to immediately pay fees pursuant thereto. In support of this Motion, Cresa hereby states as follows:

[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 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 Reorganized Debtors' service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used, but not otherwise defined herein, have the meaning assigned in the Retention Order (as defined below) or the Plan (as defined below), as applicable.

I. JURISDICTION

1. The United States Bankruptcy Court for the Southern District of Texas (the "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and this Court may enter a final order consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested in this Motion are §§ 105(a), 328, and 330 of the Bankruptcy Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "**Local Rules**"), and the Procedures for Complex Cases in the Southern District of Texas (the "**Complex Case Procedures**").

II. PRELIMINARY STATEMENT

4. This Motion arises from the Reorganized Debtors' unjustified refusal to comply with a clear, final, and binding order of this Court. On March 4, 2026, after notice and an opportunity to be heard, the Court entered the Final Fee Order, approving Cresa's fees in the amount of $1,950,000.00 on a final basis and authorizing payment by the Reorganized Debtors. Not a single party in interest—not the Reorganized Debtors, not the U.S. Trustee, not the Creditors' Committee, not any creditor—filed an objection to Cresa's fee application. The time to object has long passed. This Court entered the Final Fee Order. The Final Fee Order has neither been stayed nor appealed.

5. The relief requested is straightforward. Cresa seeks enforcement of this Court's Final Fee Order and to compel payment pursuant thereto, together with interest to compensate for the wrongful delay in payment and reimbursement of attorneys' fees incurred solely because of the Reorganized Debtors' noncompliance. Granting this Motion will uphold the authority of the Court,

protect the integrity of the professional compensation process, and ensure that court-approved professionals are paid as required. Accordingly, the time to pay is now.

III. BACKGROUND

6. On August 20, 2025 (the "**Petition Date**"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On September 5, 2025, the United States Trustee for the Southern District of Texas (the "**U.S. Trustee**") appointed an official committee of unsecured creditors (*see* Dkt. 124), which was subsequently reconstituted on October 22, 2025. *See* Dkt. 568. No request for the appointment of a trustee or examiner was made in the Cases.

7. On December 5, 2025, the Debtors filed the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor* Affiliates [Dkt. 959] (the "**Plan**"). Section 2.4 of the Plan provides that all Professional Fee Claims (as defined by the Plan) shall "***be paid in full, in Cash***, in such amounts as are Allowed by the Bankruptcy Court or authorized to be paid in accordance with the order(s) relating to or allowing any such Professional Fee Claims" *Id.* (emphasis added).

8. On December 15, 2025, the Court entered an order [Dkt. 1055]confirming the Plan. On December 29, 2026, the Plan went effective. *See* Dkt. 1134.

9. On October 21, 2025, the Debtors filed *Application of Debtors for Entry of an Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors-in-Possession as of the Petition Date* [Dkt. 567] (the "**Retention Application**"). Attached as Exhibit A to the Retention Application was the *Vendor Service Agreement* (the "**Services Agreement**") setting for the terms of services and payment between the Debtors and Cresa.

10. On November 14, 2025, the Court entered an order [Dkt. 716] (the "**Retention Order**") approving the Retention Application (including the terms of the Services Agreement) and

authorizing the retention of Cresa as real estate consultant and advisor pursuant to section 328(a) of the Bankruptcy Code. The Retention Order approved Cresa's compensation, expense reimbursement, and indemnification provisions as set forth in the Services Agreement, as modified by the Retention Order. The Retention Order further provided that Cresa would:

> be compensated and reimbursed in accordance with, and will file fee statements and interim and final fee applications pursuant to, the applicable procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, the Complex Case Procedures, and further orders of this Court.

Id.

11. During its retention, Cresa provided critical real estate consulting and advisory services to the Debtors, including strategic analysis of markets and site selection, property surveys, lease negotiations, drafting and reviewing RFPs, evaluating landlord responses, and assisting in the negotiation of lease and purchase agreements. *See* Dkt. 1271 at ¶ 12. These services directly benefited the Debtors' estates and all creditors by maximizing the value of the Debtors' real property interests during the Chapter 11 Cases. *Id*.

12. On February 9, 2026, Cresa filed its *First and Final Fee Application of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors, for the Period from August 20, 2025 Through December 29, 2025* [Dkt. 1272] (the "**Final Fee Application**"), seeking allowance of compensation and reimbursement of expenses in the amount of $1,950,000.00.

13. The deadline to file objections to the Final Fee Application was March 2, 2026. Not a single objection was filed.

14. On March 3, 2026, the Reorganized Debtors filed a *Certificate of No Objection Regarding First and Final Fee Application of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors, for the Period from August 20, 2025 Through December 29, 2025* [Dkt. 1340], in which the Reorganized Debtors' counsel represented to this Court that "counsel has reviewed the

Court's docket and no objections or other responses to the Application have been filed on the Court's docket, and the Reorganized Debtors are unaware of any other objection to the Application." *Id*. The Reorganized Debtors then affirmatively requested that this Court enter the proposed Final Fee Order. *Id*.

15. On March 4, 2026, the Court entered an order [Dkt. 1348] (the "**Final Fee Order**"). The Final Fee Order provides, in unambiguous terms, that:

- "Applicant is allowed compensation and reimbursement of expenses in the amount of $1,950,000.00."
- "The compensation and reimbursement of expenses allowed in this Order are approved on a final basis."
- "The Reorganized Debtors are authorized to disburse any unpaid amounts allowed by [] this Order."

See id.

16. The Final Fee Order is clear, final, and unconditional. There is no ambiguity. There is no contingency. The Reorganized Debtors are "authorized"—and, indeed, obligated—to pay Cresa the full $1,950,000.00.

17. Notwithstanding the clarity and finality of the Final Fee Order, the Reorganized Debtors have failed to pay Cresa any portion of the $1,950,000.00 allowed by the Court.

18. Cresa has made repeated demands upon the Reorganized Debtors for payment. The Reorganized Debtors have not provided any legitimate justification for their refusal to comply with the Final Fee Order. This refusal is not merely a breach of the Reorganized Debtors' obligations—it is a willful disregard of a binding order of this Court.

19. As a direct result of the Reorganized Debtors' noncompliance, Cresa has been forced to incur additional attorneys' fees and costs to enforce the Final Fee Order.

IV. RELIEF REQUESTED

20. By this Motion, Cresa respectfully requests that this Court enter an order:

a. Compelling the Reorganized Debtors to immediately pay Cresa the full amount of $1,950,000.00 as allowed by the Final Fee Order;

b. Awarding Cresa interest on the unpaid balance at the applicable rate;

c. Awarding Cresa its reasonable attorneys' fees and expenses incurred in connection with bringing this Motion; and

d. Granting such other and further relief as this Court deems just and proper.

V. BASIS FOR RELIEF

A. The Reorganized Debtors Are Bound By The Final Fee Order And Plan And Must Comply With Their Terms.

21. The Final Fee Order is a final, binding order of this Court. It was entered after full notice, adequate opportunity to be heard, and the express certification by the Reorganized Debtors' own counsel that no objections had been filed. The Final Fee Order approved Cresa's fees and expenses "on a final basis" and authorized the Reorganized Debtors to disburse the amounts owed.

22. Moreover, section 2.4 of the Plan requires that Cresa "be paid in full, in Cash, in such amounts that are Allowed by the Bankruptcy Court . . . ." Plan at § 2.4. Taken in conjunction with the allowance of $1,950,000 in fees set forth in the Final Fee Order, the Reorganized Debtors have no other recourse but to pay such amount to Cresa.

23. It is hornbook law that orders of a bankruptcy court are binding on all parties and must be obeyed unless and until they are reversed, modified, or set aside. *See Celotex Corp. v. Edwards*, 514 U.S. 300, 313 (1995) ("[P]ersons subject to an injunctive order issued by a court

with jurisdiction are expected to obey that decree until it is modified or reversed."). The Reorganized Debtors have not sought to appeal, modify, or vacate the Final Fee Order. Their obligation to pay is absolute.

24. Section 105(a) of the Bankruptcy Code vests this Court with the power to "tak[e] any action or mak[e] any determination necessary or appropriate to enforce or implement court orders or rules." 11 U.S.C. § 105(a). This Court has the inherent authority—and the duty—to enforce its own orders. *See Placid Ref. Co. v. Terrebonne Fuel & Lube (In re Terrebonne Fuel & Lube)*, 108 F.3d 609, 613 (5th Cir. 1997). *See also In re Marcus Hook Development Park, Inc*., 943 F.2d 261, 266 (3d Cir. 1991) (holding that, under Section 105(a), bankruptcy courts have "the power and the jurisdiction to enforce its valid orders") (quoting *In re Radco Merchandising Services, Inc*., 111 B.R. 684, 688-89 (N.D. Ill. 1990)); *In re Blast Energy Servs.*, 396 B.R. 676, 688-89 (Bankr. S.D. Tex. 2008); *In re Protarga, Inc*., 329 B.R. 451, 479 (Bankr. D. Del. 2005) ("In the exercise of this authority, courts have inherent powers to enforce compliance with and execution of their lawful orders.").

B. No Objection Was Filed To The Final Fee Application, And The Deadline To Object Has Long Since Passed.

25. The significance of the fact that no objection was filed to the Final Fee Application cannot be overstated. Every party in interest—including the Reorganized Debtors, the U.S. Trustee, the Creditors' Committee, and all creditors—had 21 days to raise any challenge to Cresa's compensation. The Reorganized Debtors cannot now—after the objection deadline has expired, after their own counsel certified that no objections existed, and after this Court entered a final order—refuse to pay on grounds that could and should have been raised during the objection period.

26. Moreover, Cresa's retention and compensation structure were approved under § 328(a) of the Bankruptcy Code. The Fifth Circuit has made clear that, absent unforeseeable circumstances, parties are bound by compensation approved under section 328 of the Bankruptcy Code. *See ASARCO, L.L.C. v. Barclays Capital Inc. (In re ASARCO, L.L.C.)*, 702 F.3d 250, 257-58 (5th Cir. 2012). Allowing the Reorganized Debtors to withhold payment after final approval would undermine the certainty section 328 is designed to provide and directly contravene controlling Fifth Circuit precedent.

27. The Reorganized Debtors had every opportunity to object to the Final Fee Application and chose not to do so. They are now foreclosed from withholding payment on any basis.

C. The Reorganized Debtors' Own Counsel Affirmatively Sought Entry Of The Final Fee Order.

28. The Reorganized Debtors' position is made all the more untenable by the fact that it was their own counsel who filed the Certificate of No Objection and who affirmatively requested that this Court enter the Final Fee Order. The Reorganized Debtors cannot, in good faith, ask this Court to enter an order requiring them to pay Cresa $1,950,000.00 and then simply refuse to do so. Such conduct is inconsistent with the most basic principles of good faith, fair dealing, and respect for judicial process.

29. Under the doctrine of judicial estoppel, a party that takes a position before a court is precluded from later adopting a clearly inconsistent position. *See New Hampshire v. Maine*, 532 U.S. 742, 749–50 (2001). The Reorganized Debtors' certification of no objection and request for entry of the Final Fee Order constituted an unequivocal representation to this Court that the Fee Application was proper and should be approved. Moreover, where a party affirmatively induces the entry of an order, the invited-error doctrine likely bars that party from later resisting or challenging the order sought. *See Kempton v. Clark (In re Clark)*, 662 F. App'x 544, 546 (9th Cir.

2016) ("In addition, under the invited error doctrine, Kempton cannot invite a purported error in the bankruptcy court and then on appeal complain of that very error."). *See also United States v. Baytank (Houston), Inc.*, 934 F.2d 599, 606 (5th Cir. 1991). The Reorganized Debtors cannot request entry of the Final Fee Order and then refuse to comply with it.

D. THE REORGANIZED DEBTORS' REFUSAL TO PAY WARRANTS SANCTIONS.

30. The Reorganized Debtors' willful noncompliance with the Final Fee Order warrants the imposition of sanctions. Section 105(a) of the Bankruptcy Code and this Court's inherent contempt power provide ample authority to sanction parties who fail to comply with court orders. *See In re Terrebonne Fuel & Lube*, 108 F.3d at 613.

31. At a minimum, Cresa is entitled to recover the attorneys' fees and expenses it has been forced to incur in bringing this Motion to enforce an order that the Reorganized Debtors should have voluntarily obeyed. Cresa should not be required to bear the cost of compelling the Reorganized Debtors to do what they are already obligated to do.

E. INTEREST SHOULD ACCRUE ON THE UNPAID BALANCE.

32. Cresa is entitled to post-judgment interest on the unpaid $1,950,000.00 from the date the Final Fee Order was entered—March 4, 2026—until the date of payment. See 28 U.S.C. § 1961 (providing for post-judgment interest on any money judgment in a civil case recovered in a district court). In addition to section 1961, section four of the Services Agreement further provides that any invoice not paid within 30 days accrues interest at a rate of 1.5% per month. Treating entry of the Final Fee Order as the invoice date, the Reorganized Debtors had until April 3, 2026 to pay Cresa without incurring any interest. At an interest rate of 1.5% per month, with incurred fees of $1,950,000, the monthly interest comes to $29,250 or $975 per day.

33. The Reorganized Debtors should not benefit from their own delay and noncompliance. Accordingly, the Court should allow interest pursuant to 28 U.S.C. § 1961 or subject to the terms of the Services Agreement.

VI. NOTICE

34. Notice of this Motion has been provided to (i) the Reorganized Debtors and counsel for the Reorganized Debtors; (ii) the Office of the United States Trustee for the Southern District of Texas; and (iii) all parties in interest who have filed a notice of appearance and requested notice in the Chapter 11 Cases. Cresa respectfully submits that no further notice of this Motion is required.

VII. CONCLUSION

WHEREFORE, Cresa, LLC respectfully requests that this Court enter an order (a) compelling the Reorganized Debtors to immediately pay Cresa the full allowed amount of $1,950,000.00 pursuant to the Final Fee Order, (b) awarding post-judgment interest on the unpaid balance, (c) awarding Cresa its reasonable attorneys' fees and expenses incurred in bringing this Motion, and (d) granting such other and further relief as this Court deems just and proper.

[signature page to follow]

Respectfully Submitted:

Dated: April 3, 2026
Dallas, Texas

THOMPSON COBURN LLP

/s/ Alexandria Rahn
Liz Boydston (SBN 24053684)
Alexandria Rahn (SBN 24110246)
2100 Ross Avenue Suite 3200
Dallas, TX 75201
Telephone: (972) 629-7100
Facsimile: (972) 629-7171
lboydston@thompsoncoburn.com
arahn@thompsoncoburn.com

Attorneys for Cresa, LLC

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 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 (i) the Reorganized Debtors and counsel for the Reorganized Debtors; (ii) the Office of the United States Trustee for the Southern District of Texas; and (iii) all parties in interest who have filed a notice of appearance and requested notice in the Chapter 11 Cases.

/s/Liz Boydston
Liz Boydston

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)

ORDER ENFORCING
FINAL FEE ORDER AND COMPELLING
PAYMENT OF ALLOWED COMPENSATION AND EXPENSES
OF CRESA, LLC, REAL ESTATE CONSULTANT AND ADVISOR
TO THE DEBTORS, AND AWARDING INTEREST AND ATTORNEY'S FEES

Upon the *Motion of Cresa, LLC to Compel Payment of Court-Approved Fees and For Related Relief* [Dkt.] (the "**Motion**");[2] and it appearing that:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, and this is a core proceeding within the meaning of 28 U.S.C. § 157(b);

B. Venue is proper in this District;

C. On February 9, 2026, Cresa, LLC ("**Cresa**") filed the Final Fee Application;

D. The deadline to file objections to the Final Fee Application was March 2, 2026, and no objections or other responses to the Final Fee Application were filed by any party in interest;

E. On March 3, 2026, the Reorganized Debtors filed a Certificate of No Objection [Dkt. 1340], in which counsel for the Reorganized Debtors represented to this Court that no

[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 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 Reorganized Debtors' service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms not otherwise defines shall have the meaning set forth in the Motion.

objections or other responses to the Final Fee Application had been filed on the Court's docket, that the Reorganized Debtors were unaware of any other objection to the Final Fee Application, and that the Reorganized Debtors affirmatively requested that the Court enter the proposed Final Fee Order;

F. On March 4, 2026, this Court entered the Final Fee Order, which allowed Cresa compensation and reimbursement of expenses in the amount of $1,950,000.00, approved such compensation and reimbursement on a final basis, and authorized the Reorganized Debtors to disburse any unpaid amounts allowed thereunder;

G. The Final Fee Order has not been stayed or appealed;

H. Despite the entry of the Final Fee Order, the Reorganized Debtors have failed to disburse to Cresa the full amount of $1,950,000.00 allowed and approved on a final basis by this Court;

I. The Court having reviewed the Motion, any responses thereto, and the record in this proceeding, it has determined that the relief requested in the Motion is appropriate and warranted under the circumstances;

J. Notice of the Motion was proper; and

K. Good and sufficient cause exists for the relief granted herein.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** in its entirety.

2. The Reorganized Debtors shall pay to Cresa within five (5) business days of the entry of this Order, the full amount of $1,950,000.00 less any amounts previously disbursed to Cresa on account of the Final Fee Order, in immediately available funds by wire transfer to an account designated by Cresa (such remaining unpaid balance, the "**Outstanding Amount**").

3. The Reorganized Debtors are hereby ordered and directed to pay Cresa the greater of (a) post-judgment interest on the Outstanding Amount, calculated at the federal post-judgment interest rate prescribed by 28 U.S.C. § 1961, accruing from March 4, 2026 (the date of entry of the Final Fee Order) through the date on which the Outstanding Amount is paid in full or (b) interest pursuant to section four of the Services Agreement at a rate of 1.5% per month, accruing from April 4, 2026 to the date on which the Outstanding Amount is paid in full (the "**Interest Amount**"). The Interest Amount shall be paid concurrently with the Outstanding Amount.

4. The Reorganized Debtors are hereby ordered and directed to pay Cresa its reasonable attorneys' fees and expenses actually incurred in connection with the preparation, filing, and prosecution of the Motion (the "**Enforcement Costs**"). Within fourteen (14) days of the entry of this Order, Cresa shall file and serve a declaration setting forth, with reasonable specificity, the Enforcement Costs incurred. The Reorganized Debtors shall pay the Enforcement Costs within seven (7) business days of the filing of such declaration, unless the Reorganized Debtors file an objection to such Enforcement Costs within seven (7) days of service of the declaration, in which event the Court shall determine the amount of Enforcement Costs to be awarded after notice and a hearing.

5. The Reorganized Debtors shall provide written confirmation to Cresa and to this Court, by filing a notice on the docket, of full compliance with Paragraphs 2 and 3 of this Order within two (2) business days of making each of the required payments.

6. In the event the Reorganized Debtors fail to comply with Paragraphs 2 or 3 of this Order within the time periods specified herein, Cresa may, upon five (5) days' notice to the Reorganized Debtors, seek further relief from this Court, including but not limited to sanctions,

civil contempt proceedings, and additional interest at the maximum rate permitted by applicable law.

7. Nothing in this Order shall be construed to modify, amend, or supersede the Final Fee Order, which remains in full force and effect. This Order is supplemental to, and in enforcement of, the Final Fee Order.

8. Notwithstanding any provision of the Bankruptcy Rules to the contrary, including Bankruptcy Rules 6004(h) and 7062, this Order shall be immediately effective and enforceable upon its entry, and no stay of execution or effectiveness of this Order shall apply.

9. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order, including any disputes regarding the calculation of the Interest Amount and the reasonableness of the Enforcement Costs.

Signed: _____

_____
ALFREDO R. P RE
UNITED STATES BANKRUPTC JUDGE

#1414

25-90309

ModivCare Inc. and VRI Intermediate Holdings, LLC
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the record.

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

In re:	§	
	§	
MODIVCARE, INC., *et al.,*	§	Case No. 25-90309 (ARP)
	§	Chapter 11
Reorganized Debtors.	§	(Jointly Administered)
	§	Judge Alfredo R. Pérez

MODIVCARE TOPCO, LLC'S EMERGENCY MOTION FOR RECONSIDERATION OF (I) ORDER BIFURCATING LEGAL AND FACTUAL ISSUES AND (II) ORDER REQUIRING DEPOSIT OF FUNDS INTO COURT REGISTRY

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ModivCare Topco, LLC ("**TopCo**" or the "**Reorganized Debtor**") respectfully moves for reconsideration of two orders announced at the April 6, 2026 status conference in connection with the Objection to White & Case LLP's Final Fee Application and AlixPartners' Final Fee Application: (I) the Order Bifurcating Legal and Factual Issues (the "**Bifurcation Order**"), and (II) the Order Requiring Deposit of Funds into the Court Registry (the "**Escrow Order**" and, collectively with the Bifurcation Order, the "**Orders**"). In support, TopCo respectfully shows the Court as follows:

JURISDICTION AND STANDARD OF REVIEW

1. This Court has jurisdiction under 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (B). Venue is proper under 28 U.S.C. § 1409.

2. A bankruptcy court possesses inherent authority to reconsider its interlocutory orders at any time before entry of final judgment. *See Melancon v. Texaco, Inc.*, 659 F.2d 551, 553 (5th Cir. 1981) ("[A] district court has broad discretion to reconsider and modify its interlocutory orders any time prior to final judgment."). Where, as here, a party identifies "a manifest error of law or fact" or a "clear error" in the court's reasoning, reconsideration is appropriate. *See Livingston Downs Racing Ass'n, Inc. v. Jefferson Downs Corp.*, 259 F. Supp. 2d 471, 475 (M.D. La. 2002). A motion to reconsider is also warranted where the court's order rests on an "erroneous legal standard." *Simon v. United States*, 891 F.2d 1154, 1159 (5th Cir. 1990).

BASIS FOR EMERGENCY RELIEF

3. Emergency consideration is warranted because the proposed Escrow Order will necessarily set a compliance deadline requiring TopCo to transfer approximately $1.644 million into the Court's registry. TopCo requests consideration prior to any deadline passing. Absent emergency consideration, TopCo faces the choice of complying with an order it contends is legally infirm or risking contempt.

SUMMARY OF RELIEF REQUESTED

4. TopCo recognizes and respects this Court's broad authority to manage its docket. This motion does not challenge that authority. It respectfully submits that both Orders, as

announced, exceed the bounds of what the Bankruptcy Code, the Federal Rules, Fifth Circuit precedent, and the Due Process Clause permit.

5. *The Bifurcation Order.* The Bifurcation Order purports to resolve "legal issues" in a first phase before any evidentiary hearing. This conflicts with Federal Rule of Bankruptcy Procedure 9014(d)'s mandatory directive that testimony on disputed material factual issues "must be taken in the same manner as testimony in an adversary proceeding." It also contravenes the Fifth Circuit's categorical rule, most recently reaffirmed in *In re Assadi*, 2025 U.S. App. LEXIS 13678 (5th Cir. June 4, 2025), that an evidentiary hearing is mandatory when fee-application objections raise disputed material facts.

6. *The Escrow Order.* The Escrow Order commands TopCo to affirmatively transfer approximately $1.644 million of its own funds into the Court's registry before a single dollar of professional fees has been finally and judicially allowed under 11 U.S.C. § 330. That is a ***mandatory injunction***—among the most disfavored forms of equitable relief in the Fifth Circuit—which may issue only upon a showing of "clear entitlement" to relief under the facts and the law. *Justin Indus., Inc. v. Choctaw Sec., L.P.*, 920 F.2d 262, 268 n.7 (5th Cir. 1990). No party moved for this order. It was entered *sua sponte* at a status conference without an evidentiary record, without a showing of irreparable harm, and without a finding of a clear entitlement and likelihood of success on the merits. Moreover, no provision of the Bankruptcy Code authorizes such relief: Section 105(a) cannot be used to compel payment of fees not yet allowed under § 330. *Law v. Siegel*, 571 U.S. 415 (2014).

7. TopCo respectfully requests that the Court reconsider, and: (1) deny/vacate the Escrow Order in its entirety; and (2) deny/vacate the Bifurcation Order and set a single, unified

evidentiary hearing at which all issues, legal and factual, are addressed on a complete record after a reasonable time for discovery.

RELEVANT BACKGROUND

8. On February 11, 2026, AlixPartners, LLP, ("**AlixPartners**") filed its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 10, 2025 Through December 29, 2025 [ECF No. 1288] (the "**AlixPartners Fee Application**"), seeking allowance of approximately $5 million in fees and expenses.

9. On February 12, 2026, White & Case, LLP ("**White & Case**") filed its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025 [ECF No. 1290] (the "**WC Fee Application**"), seeking allowance of approximately $14 million in fees and expenses. Collectively, the AlixPartners Fee Application and the WC Fee Application are referred to as the "**Fee Application**".

10. On March 4, 2026, TopCo filed its Objection to the AlixPartners Fee Application [ECF No. 1351] (the "**AlixPartners Objection**"). On March 5, 2026, TopCo filed its Objection to the WC Fee Application [ECF No. 1354] (the "**WC Objection**" and collectively with the AlixPartners Objection the **"Objection"**). The Objection presents three tiers of alternative relief: (a) complete denial of fees under § 328(c); (b) reduction and equitable subordination under §§ 330 and 510(c); and (c) reduction under § 330 alone. Each tier depends on the same core factual record: the alleged $30 million demand made by White & Case partner Scott Greissman; White & Case's subsequent execution of that demand through its billing practices; and specific, granular challenges to the reasonableness and necessity of more than $14 million in fees billed by 54 timekeepers over 111 days.

11. Following the Objection, TopCo served narrowly tailored document requests (the "**RFPs**") directed to those factual issues to White & Case. White & Case refused to produce a single document absent a court order.

12. On April 3, 2026, TopCo filed a Motion to Compel [ECF No. 1409]. The same day, White & Case filed its Reply [ECF No. 1410] (the "**Reply**"), in which, without filing a separate motion, it requested that the Court address purportedly "legal" issues first and defer or preclude factual development. AlixPartners, LLP filed its own Reply [ECF No. 1411].

13. On April 6, 2026, the Court held a status conference and *sua sponte*: (a) ordered bifurcation of the hearing into Phase 1 ("legal issues") and Phase 2 ("factual issues"); and (b) indicated its intent to require TopCo to deposit all disputed amounts, approximately $628,727.58 related to White & Case and $1,016,169.40 related to AlixPartners, into the Court's registry.

14. On April 8, 2026, White & Case circulated proposed orders memorializing both rulings. The proposed Escrow Order sets an April 10, 2026 compliance deadline—affording TopCo only days to transfer $1.644 million without any prior motion, briefing, or evidentiary hearing.

ARGUMENT

THE BIFURCATION ORDER VIOLATES THE BANKRUPTCY CODE, THE FEDERAL RULES, AND FIFTH CIRCUIT PRECEDENT.

A. The Bankruptcy Code and Rule 9014 Mandate an Evidentiary Hearing.

15. Section 330(a)(1) provides that the court may award reasonable compensation only "[a]fter notice to the parties in interest and the United States Trustee and a hearing." 11 U.S.C. § 330(a)(1). Section 102(1)(B)(i) provides that the court may act without an actual hearing

only if a hearing "is not requested by a party in interest." TopCo has affirmatively requested a hearing.

16. Federal Rule of Bankruptcy Procedure 9014 governs contested matters, including fee-application objections. The Advisory Committee Notes confirm: "If a party in interest opposes the amount of compensation sought by a professional, there is a dispute which is a contested matter." Rule 9014(d) then provides in mandatory terms: "A witness's testimony on a disputed material factual issue must be taken in the same manner as testimony in an adversary proceeding." FED. R. BANKR. P. 9014(d) (emphasis added). The 2002 Advisory Committee Notes reinforce: "if the motion cannot be decided without resolving a disputed material issue of fact, an evidentiary hearing must be held." The rule is mandatory, not permissive.

B. Fifth Circuit Precedent Categorically Requires an Evidentiary Hearing When Material Facts Are Disputed.

17. In *In re U.S. Golf Corp.*, 639 F.2d 1197, 1202 (5th Cir. 1981), the Fifth Circuit categorically held that "the judge must hold an evidentiary hearing if there are any disputed factual issues" when determining attorneys' fees in bankruptcy. This holding was reaffirmed in *In re First Colonial Corp. of America*, 544 F.2d 1291, 1300 (5th Cir. 1977).

18. *In re Assadi*, 2025 U.S. App. LEXIS 13678 (5th Cir. June 4, 2025), reaffirmed the *U.S. Golf Corp.* mandate. The court upheld denial of an evidentiary hearing *only* because the *pro se* objector had raised exclusively legal challenges "concern[ing] the legal conclusions the court should draw from the record", without asserting "disputed factual issues that would benefit from 'testimony of witnesses.'" *Id.* at *3. This case is the polar opposite. TopCo's Objection identifies, with specificity, more than a dozen categories of disputed

billing conduct—including the alleged $30 million demand, systemic overstaffing, and specific unreasonable billing entries, each of which requires witness testimony to resolve. *Assadi* thus supports, rather than undermines, TopCo's entitlement to an evidentiary hearing.

19. In *Sylvester v. Chaffe McCall, L.L.P. (In re Sylvester)*, 23 F.4th 543, 549 (5th Cir. 2022), the Fifth Circuit vacated a fee award because the court below failed to require the applicant to affirmatively prove each element of its fee request upon the filing of an objection. A bifurcation procedure designed to preemptively foreclose the evidentiary hearing would relieve White & Case of that burden—the antithesis of what *Sylvester* commands. The Supreme Court's treatment of contested fee applications confirms this expectation: in *Baker Botts L.L.P. v. ASARCO LLC*, 576 U.S. 121, 125 (2015), the bankruptcy court conducted "extensive discovery and a 6-day trial" on contested fee applications before ruling on objections—a procedure the Supreme Court treated as the unquestioned baseline.

C. Every Issue White & Case Labels "Legal" Requires Factual Findings.

20. The Phase 1 issues identified in the Bifurcation Order are not genuinely separable from the factual record:

21. Standing. The Fifth Circuit has developed a structured approach to jurisdictional challenges, including standing, under Rule 12(b)(1). *Williamson v. Tucker*, 645 F.2d 404 (5th Cir. 1981), which established that a district court may find lack of subject matter jurisdiction based on any one of three separate bases: (1) the complaint alone; (2) the complaint supplemented by undisputed facts *evidenced in the record*; or (3) the complaint supplemented by *undisputed facts* plus the court's resolution of disputed facts. *Williamson v. Tucker*, 645 F.2d at 413 (emphasis added).

22. However, it is unclear whether the Court's oral statements questioning "standing" reflect a question of Article III standing and/or prudential standing, further confusing the necessary proof/evidence that may be required. See *Abraugh v. Altimus*, 26 F.4th 298, 303-04 (5th Cir. 2022) (Not being a proper plaintiff does not defeat Article III standing. "[S]tanding in federal court is determined entirely by Article III and depends in no degree on whether standing exists under state law.") (citations omitted)

23. The "standing" issue is also clearly dependent on factual questions, as indicated by the Court itself. The Court indicated that after conducting an independent review of the reorganized Debtor's corporate documents, the Court itself indicated it had fact questions.

24. "Standing" (Article III and prudential) also raises an additional factual issue – is TopCo liable at all for any fee award? If there is liability, there must be standing under either analysis. And, the Court has apparently determined that there is liability by indicating it would enter the Escrow Order against TopCo requiring it to deposit disputed funds, predetermining liability.

25. Rule 408 Applicability. Before determining whether Rule 408 shields Mr. Greissman's statements, the Court must find whether those statements were made "in the course of compromise negotiations concerning a disputed claim." FED. R. EVID. 408(a). TopCo alleges they were not offers of compromise but unilateral threats—a disputed factual issue. The Court must also address Rule 408(b) exceptions, including whether the statements are admissible to show the bias, motive, and context for the billing patterns that followed. Moreover, Mr. Greissman reiterated the same demand in separate communications with the Consenting Creditors' counsel outside any settlement context; whether those communications fall within Rule 408 is a factual question requiring testimony. Neither

Ramada Development Co. v. Rauch, 644 F.2d 1097 (5th Cir. 1981), nor *Blu-J, Inc. v. Kemper C.P.A. Group*, 916 F.2d 637 (11th Cir. 1990)—the cases on which White & Case principally relies—involved a fiduciary who allegedly threatened to impose harm on the estate it was obligated to serve.

26. The Woerner "Good Gamble" Inquiry. The Fifth Circuit's *en banc* decision in *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266, 274 (5th Cir. 2015), requires the Court to assess whether services were "reasonably likely to benefit the estate" *at the time they were rendered*—a prospective, fact-intensive inquiry into what the professionals knew, what alternatives existed, and why they chose to proceed as they did. This cannot be resolved on a paper record.

27. Section 330 Reasonableness Factors. The statutory factors under § 330(a)(3)—including time spent, rates charged, necessity, and reasonableness—are explicitly factual. The Court cannot discern from billing records alone why seven attorneys attended a single deposition, why multiple timekeepers reviewed a routine *pro hac vice* application, or why 54 timekeepers were deployed over 111 days. That inquiry requires testimony about staffing decisions, delegation, and billing judgment.

28. White & Case's Fee-Comparison Theory. White & Case devotes substantial portions of its Reply to comparing its fees with those of Latham & Watkins LLP. This comparison, raised by White & Case, not TopCo, is itself fact-intensive. Whether the work performed by the two firms was truly comparable, whether Latham's undisclosed pre-petition fees distort the comparison (White & Case's own Reply concedes they were "most likely substantial"), and whether Latham's approval without objection establishes a reasonableness benchmark are factual questions requiring evidence.

29. Section 328(a) Pre-Approval. The Order Authorizing Employment (the "Order") *refers* to Section 328, with White & Case suggesting that the mere reference locks in billing *rates.* However, the Order of Employment goes on to explicitly say that all fee applications are subject to sections 330 and 331, and the Order clearly does not immunize the *volume* of hours billed, the number of timekeepers deployed, or the reasonableness of specific services from § 330 scrutiny. These remain inherently fact-intensive inquiries. White & Case's Reply first assumes just the mention of 328 somehow creates pre-approval on final application of their rates, and compounds the assumption by suggesting by arguing that the supposed prior approval of its rates forecloses any challenge to its fees. *See* Reply ¶ 34.

D. Bifurcation Contravenes Rule 42(b)'s Efficiency Requirement.

30. Federal Rule of Civil Procedure 42(b), applicable through FED. R. BANKR. P. 9014(c), permits bifurcation only "for convenience, to avoid prejudice, or to expedite and economize." *See Lindsey v. Prive Corp.*, 161 F.3d 886, 892 (5th Cir. 1998). Bifurcation accomplishes the opposite here. Because every Phase 1 "legal" issue either requires factual predicate findings or will not eliminate Phase 2, the parties will brief the same issues twice—first on an incomplete record, then again after discovery and evidence are presented. This multiplies cost, burden, and delay.

31. Bifurcation also risks unfair prejudice by fragmenting a fact-dependent record. The Objection presents a unified factual narrative—that White & Case adopted a strategy to generate excessive fees and executed it across multiple workstreams. Preliminary rulings on a limited record may shape and constrain the scope of Phase 2, preventing TopCo from presenting the full context necessary for a fair adjudication.

E. Section 105(a) Cannot Override the Evidentiary Hearing Requirement.

32. To the extent the Bifurcation Order rests on § 105(a), that foundation fails for the same reasons that defeat the Escrow Order. *Law v. Siegel* and *NexPoint Advisors* foreclose the use of § 105(a) to override the specific evidentiary-hearing mandate of Rule 9014(d) and § 330(a)(1).

F. The Consenting Creditors' Own Contemporaneous Statements Confirm the Factual Nature of This Dispute.

33. White & Case invokes the confirmation proceedings as establishing that the Committee's litigation was reasonable. But confirmation addressed whether the Plan satisfied § 1129—not whether the fees incurred in litigating those matters were reasonable when incurred. The Consenting Creditors' Statement filed on October 28, 2025 [ECF No. 589]—filed by the parties who now control TopCo—explicitly warned in real time that the Committee's strategy was to "bury the estate in exponentially expanding professional fees." Whether that contemporaneous assessment was accurate, and whether White & Case's subsequent billing patterns bear it out, are classic questions of fact requiring witness testimony.

A SINGLE, UNIFIED EVIDENTIARY HEARING IS THE ONLY LAWFUL AND EFFICIENT RESOLUTION.

34. The Objection identifies, with particularity, more than a dozen categories of disputed billing conduct totaling millions of dollars in a $14 million fee request. These are not abstract legal arguments; they are specific, fact-intensive challenges requiring witness testimony, documentary evidence, and cross-examination. A unified evidentiary hearing—with targeted discovery first is the procedurally sound, efficient, and constitutionally compliant method of resolving this dispute.

35. The Fifth Circuit's mandate in *In re U.S. Golf Corp.*, 639 F.2d at 1202, and its progeny leave no room for a procedure designed to foreclose that hearing. This Court's broad discretion to manage its docket, while fully respected, does not extend to denying a party its right to an evidentiary hearing when the Bankruptcy Code, the Federal Rules, and the Constitution require one.

THE ESCROW ORDER IS A MANDATORY INJUNCTION ENTERED WITHOUT LEGAL AUTHORITY OR THE REQUISITE SHOWING.

The Escrow Order Compels Affirmative Action and Is Therefore a Mandatory Injunction.

36. The distinction between prohibitory and mandatory injunctions is dispositive, not semantic. A prohibitory injunction restrains a party from acting and preserves the *status quo*. A mandatory injunction compels affirmative action, altering the existing state of affairs. The classification determines the applicable legal standard.

37. An Escrow Order does not preserve the *status quo*. It predetermines liability and commands TopCo to *affirmatively transfer* approximately $1.644 million of its own funds into the Court's registry before a single dollar of fees has been judicially allowed under 11 U.S.C. § 330. The characterization of the order as an "escrow" or "deposit" does not alter the analysis; substance, not label, controls. *See Savage Tavern v. Stag,* 589 F. Supp. 3d 624, 639 (N.D. Tex. 2022) (Mandatory injunction "mandates" a party to take some action inconsistent with the status quo rather than prohibiting them from altering the status quo.).

The Fifth Circuit Imposes a "Clear Entitlement" Standard on Mandatory Injunctions.

38. In *Justin Industries, Inc. v. Choctaw Securities, L.P.*, 920 F.2d 262, 268 n.7 (5th Cir. 1990), the Fifth Circuit held that a party seeking a mandatory injunction "bears the burden of showing a ***clear entitlement*** to the relief under the facts and the law." (emphasis added).

This standard is categorically more demanding than the "substantial likelihood of success" test applied to prohibitory injunctions. *Exhibitors Poster Exch., Inc. v. Nat'l Screen Serv. Corp.*, 441 F.2d 560, 561 (5th Cir. 1971) ("Nevertheless, when a plaintiff applies for a mandatory preliminary injunction, such relief 'should not be granted except in rare instances in which the facts and law are clearly in favor of the moving party.'")(cleaned up).

39. The Supreme Court reinforced in *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 24 (2008), that injunctive relief is "an extraordinary and drastic remedy" that is "never awarded as of right." *Winter* requires a clear showing on all four elements: (1) likelihood of success on the merits; (2) likelihood of irreparable harm; (3) the balance of equities favors the movant; and (4) an injunction serves the public interest. For a mandatory injunction, each factor must be demonstrated by clear and unambiguous evidence.

None of the Winter Factors Is Satisfied.

40. No party moved for the Escrow Order. It was determined *sua sponte* at a status conference without prior notice, without briefing, and without any evidentiary record bearing on the four *Winter* factors.

41. *No likelihood of success on the merits.* The Escrow Order presupposes that White & Case and AlixPartners are entitled to the disputed sums and that TopCo is liable. The liability element even more suspect when at the same hearing the Court questions TopCo's "standing". But fee allowance under § 330 is not ministerial—it requires a judicial determination that fees were reasonable and necessary. TopCo's Objection raises specific, detailed factual challenges that the Court has not yet evaluated. The outcome of this dispute is supposed to be uncertain, uncertain until the Court hears, weighs and determines the

factual record. White & Case cannot demonstrate "clear entitlement" to funds that have not been allowed.

42. *No showing of irreparable harm.* No evidence has been presented that TopCo lacks the ability or willingness to pay fees ultimately allowed. There is no allegation, let alone proof, of insolvency, asset dissipation, or collection risk. Irreparable harm cannot be presumed; it must be proven. *See Janvey v. Alguire*, 647 F.3d 585, 600 (5th Cir. 2011). This failure is independently fatal.

43. *The balance of equities favors TopCo.* Requiring the transfer of approximately $1.644 million into the Court's registry imposes immediate, concrete, and potentially prolonged harm. If this matter is appealed - a realistic prospect whatever the outcome - those funds could remain frozen through proceedings in the District Court and the Fifth Circuit for years. White & Case, by contrast, suffers no legally cognizable harm from awaiting the orderly conclusion of a contested judicial process. Its retention was approved; it was paid interim fees; and it has no present entitlement to the disputed amounts.

44. *The public interest weighs against the order.* Upholding this order would establish precedent that a reorganized debtor may be compelled to deposit disputed holdback amounts into the court's registry before its fee objection is heard on the merits. This would substantially chill good-faith fee objections, one of the few mechanisms Congress provided to police professional compensation in bankruptcy, and would effectively convert unapproved fee applications into pre-approved claims immune from meaningful review.

NO STATUTORY AUTHORITY EXISTS FOR THE ESCROW ORDER.

Section 105(a) Cannot Supply the Missing Authority.

45. The only conceivable statutory basis for the Escrow Order is 11 U.S.C. § 105(a). But § 105(a) is not a "roving commission to do equity." *United States v. Sutton*, 786 F.2d 1305, 1308 (5th Cir. 1986). The Supreme Court drew the boundary definitively in *Law v. Siegel*, 571 U.S. 415, 421 (2014), holding unanimously that "a bankruptcy court may not contravene specific statutory provisions" through § 105(a). Section 105(a) empowers courts to *implement* the Code, not to *supersede* it.

46. The fee-allowance framework under §§ 328 and 330 is a specific statutory scheme: professionals are entitled to compensation only *after* the court determines that fees are reasonable and necessary. Ordering the pre-allowance deposit of disputed fees does not implement that scheme; it inverts it. *See also NexPoint Advisors v. Highland Capital Mgmt.*, 48 F.4th 419, 437 (5th Cir. 2022) (rejecting expansive application of § 105(a) to authorize relief not specifically provided by the Code).

THE ESCROW ORDER VIOLATES DUE PROCESS.

47. TopCo has a concrete property interest in the approximately $1.644 million in disputed funds. Those funds belong to TopCo under the confirmed Plan of Reorganization until a court orders their payment following allowance of the underlying claims. Compelled transfer of a property interest requires procedural due process. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) ("The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.")(cleaned up).

48. The Escrow Order was required at a status conference with no advance notice that the Court was considering such relief, no opportunity for TopCo to file written opposition, and no

evidentiary hearing. TopCo was afforded no meaningful opportunity to be heard before being deprived of a substantial sum. *See Goldberg v. Kelly*, 397 U.S. 254, 267–71 (1970) (due process includes the right to present evidence and confront adverse witnesses when substantial property interests are at stake).

PRAYER FOR RELIEF

WHEREFORE, ModivCare Topco, LLC respectfully requests that the Court enter an Order:

(1) Denying/Vacating the Order Requiring Deposit of Funds into the Court Registry as (a) a mandatory injunction for which no movant has demonstrated the requisite "clear entitlement" under *Justin Industries, Inc. v. Choctaw Securities, L.P.*, 920 F.2d 262, 268 n.7 (5th Cir. 1990), and *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008); (b) lacking any statutory authority under the Bankruptcy Code; and (c) entered without the notice, hearing, or evidentiary record required by due process;

(2) Denying/Vacating the Bifurcation Order and setting a single, unified evidentiary hearing at which all issues—legal and factual—are addressed on a complete record, consistent with FED. R. BANKR. P. 9014(d), 11 U.S.C. §§ 102(1) and 330(a)(1), and the Fifth Circuit's mandate in *In re U.S. Golf Corp.*, 639 F.2d 1197, 1202 (5th Cir. 1981);

(3) Setting a hearing on the pending Motion to Compel [ECF No. 1409] to allow TopCo to obtain the discovery necessary for the evidentiary hearing; and

(4) Granting such other and further relief as the Court deems just and proper.

Dated: April 9, 2026

Respectfully submitted,

By: */s/ Johnie J. Patterson*
Miriam Goott
SBN 24048846
Johnie Patterson
SBN 15601700
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CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Objection was served electronically upon all parties entitled to notice pursuant to this Court's CM/ECF electronic noticing platform on April 9, 2026.

By:*/s/ Johnie Patterson*
Johnie Patterson

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

In re:	§	
	§	
MODIVCARE, INC., *et al.,*	§	Case No. 25-90309 (ARP)
	§	Chapter 11
Reorganized Debtors.	§	(Jointly Administered)
	§	Judge Alfredo R. Pérez

ORDER GRANTING RECONSIDERATION AND DENYING REQUEST FOR BIFURCATING LEGAL AND FACTUAL ISSUES AND DENYING REQUEST FOR DEPOSIT OF FUNDS INTO COURT REGISTRY

[Relates To Docket #_____]

Upon reconsideration, it is

ORDERED that the Fee Applications by White and Case and AlixPartners, and the objections thereto, shall be considered at an evidentiary hearing to be scheduled by the Court after a reasonable opportunity for discovery by both parties, and it is further

ORDERED that no escrow of funds is required.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

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

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

NOTICE OF FILING
PROPOSED SCHEDULING AND BIFURCATION ORDER

PLEASE TAKE NOTICE THAT on April 6, 2026, the U.S. Bankruptcy Court for the Southern District of Texas (the "Court") held a status conference in the above-captioned chapter 11 cases (the "Status Conference") regarding *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); and *White & Case LLP's Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the*

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Period From September 9, 2025 Through December 29, 2025 [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies").

PLEASE TAKE FURTHER NOTICE THAT on the record at the Status Conference, the Court directed White & Case, LLP ("White & Case"), AlixPartners, LLP ("AlixPartners"), and ModivCare TopCo, LLC ("TopCo") to submit a proposed order (the "Proposed Bifurcation Order") governing the bifurcation and scheduling of the disputed issues regarding the Fee Applications, Fee Objections, and Replies.

PLEASE TAKE FURTHER NOTICE THAT the parties have met and conferred regarding the Proposed Bifurcation Order, but have been unable to agree on a form of order as of the time of this notice.

PLEASE TAKE FURTHER NOTICE THAT on April 9, 2026, TopCo filed the *Modivcare Topco, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1427] requesting the Court to reconsider its rulings at the Status Conference.

PLEASE TAKE FURTHER NOTICE THAT a Proposed Bifurcation Order acceptable to White & Case and AlixPartners is attached hereto for the Court's consideration.

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April 10, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on April 10, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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

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

SCHEDULING AND BIFURCATION ORDER

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); *White & Case LLP's Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies"); *Motion to Compel White & Case LLP to Respond to Discovery Requests* [Docket No.

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

1409] (the "Motion to Compel"); and in accordance with the United States Bankruptcy Court for the Southern District of Texas (the "Court") rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Court will adjudicate the reasonableness of White & Case LLP's ("White & Case") and AlixPartners LLP's ("AlixPartners") fees under section 330 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") first based on the evidentiary record already established in the chapter 11 cases, the Fee Applications, the Fee Objections, and the Replies ("Phase 1"). The issues adjudicated during Phase 1 shall include, but not be limited to whether:

i. ModivCare TopCo, LLC ("TopCo") has standing to object to the Fee Applications;

ii. this Court may or should amend its October 31, 2025 orders authorizing the retention of (a) White & Case as bankruptcy counsel to the official committee of unsecured creditors (the "Committee") effective as of September 9, 2025 and approving White & Case's billing rates for this representation [Docket No. 616] and (b) AlixPartners as financial advisor to the Committee effective as of September 10, 2025 and approving the compensation terms set forth in the applicable engagement letter [Docket No. 644];

iii. TopCo may object to the reasonableness of any time entry or expense item not specifically identified in the Fee Objections;

iv. the Court should consider, in connection with the Fee Applications, any documents or testimony concerning any offers, statements, or other communications made in the context of settlement discussions involving the Committee, including those alleged in the Fee Objections;

v. there is a basis to establish a different standard under which to assess the reasonableness of the Debtors' professionals' fees which this Court has approved without objection and the Committee's professionals' fees sought in the Fee Applications;

vi. under the applicable standard and without any additional discovery, the Court can determine the reasonableness of the fees being sought; and

vii. under the applicable standard and without any additional discovery, the Court should grant the Fee Applications.

2. In Phase 1 the Court will not consider any additional evidence beyond the Fee Applications, the Fee Objections, the Replies, and matters as to which this Court may take judicial notice. The hearing on Phase 1 will be on _____.

3. If the Court determines that it cannot fully resolve the Objection and the Fee Applications in Phase 1, the Court will consider additional evidence related to the Fee Objections that are not resolved in Phase 1 ("Phase 2"). All Parties reserve the right to seek any appropriate discovery in Phase 2 related to any issues not adjudicated in Phase 1. A hearing on Phase 2 will, if necessary, be set by further order of the Court.

4. White & Case shall submit responses to the Motion to Compel by April 24, 2026. Other than litigation of the Motion to Compel, all discovery related to the Fee Applications shall be stayed pending resolution of Phase 1 or other order of the Court.

5. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

6. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated _____, 2026
Houston, Texas

_____
Alfredo R. Pérez
United States Bankruptcy Judge

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

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

NOTICE OF FILING
PROPOSED ORDER REQUIRING THE REORGANIZED DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT

PLEASE TAKE NOTICE THAT on April 6, 2026, the U.S. Bankruptcy Court for the Southern District of Texas (the "Court") held a status conference in the above-captioned chapter 11 cases (the "Status Conference") regarding *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); and *White & Case LLP's Reply in Support*

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025 [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies").

PLEASE TAKE FURTHER NOTICE THAT on the record at the Status Conference, the Court directed the Reorganized Debtors to escrow the unpaid amounts sought by White & Case, LLP ("White & Case") and AlixPartners, LLP ("AlixPartners") in the Fee Applications in the registry of the Court and further directed the parties to submit a proposed order (the "Proposed Escrow Order") governing such escrow of funds.

PLEASE TAKE FURTHER NOTICE THAT the parties have met and conferred regarding the Proposed Escrow Order, but have been unable to agree on a form of order as of the time of this notice.

PLEASE TAKE FURTHER NOTICE THAT on April 9, 2026, ModivCare TopCo, LLC filed *Modivcare Topco, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1427] requesting the Court to reconsider its rulings at the Status Conference.

PLEASE TAKE FURTHER NOTICE THAT a Proposed Escrow Order acceptable to White & Case and AlixPartners is attached hereto for the Court's consideration.

[*Remainder of Page Intentionally Left Blank*]

April 10, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on April 10, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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

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

ORDER REQUIRING THE REORGANIZED DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the "W&C Application"), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the "AlixPartners Application" and, together with the W&C Application, the "Applications"); and in accordance with the Court's rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court Registry"), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

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in the Applications, including $628,727.58 in connection with the W&C Application and $1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated _____, 2026
Houston, Texas

_____
Alfredo R. Pérez
United States Bankruptcy Judge

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

IN RE:	§	CASE NO. 25-90309-11
	§	HOUSTON, TEXAS
MODIVCARE INC., ET AL,	§	MONDAY,
	§	APRIL 6, 2026
DEBTORS.	§	9:00 A.M. TO 9:27 A.M.

STATUS CONFERENCE

BEFORE THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES: SEE NEXT PAGE

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APPEARANCES (VIA ZOOM):

FOR THE REORGANIZED DEBTORS:	Walker and Patterson By: JOHNIE PATTERSON MIRIAM GOOTT 4815 Dacoma Street Houston, TX 77092 713-956-5577
FOR WHITE & CASE:	White & Case By: JASON ZAKIA 300 N. LaSalle Drive Chicago, IL 60654 312-881-5400
FOR ALIXPARTNERS:	AlixPartners By: KAITLYN SUNDT MCCLARREN 200 Town Center Suite 2400 Southfield, MI 48075 248-358-4420
	AlixPartners By: ELIZABETH KARDOS 909 3rd Avenue Floor 30 New York, NY 10022 212-490-2500

(Please also see Electronic Appearances.)

HOUSTON, TEXAS; MONDAY, APRIL 6, 2026; 9:00 A.M.

THE COURT: Good morning. It is Monday, April 6th, 2026. We're here for the 9:00 o'clock Docket in Case Number 25-90309, ModivCare Inc. We have a Status Conference on two objections.

So why don't we get appearances of counsel? And make sure to go to my web page and note your appearance because that's how we keep track of appearances in this case.

MR. PATTERSON: So I'll go first.

MR. ZAKIA: Good morning, Your Honor. Jason Zakia of White & Case on behalf of White & Case.

THE COURT: All right. Good morning.

MR. PATTERSON: Johnie Patterson here, on behalf of the Reorganized Debtors, Your Honor.

THE COURT: Morning -- good morning.

MS. GOOTT: Good afternoon, I mean good morning. Miriam Goott here, on behalf of the Reorganized Debtors.

THE COURT: All right. Good morning.

All right. Anyone else wish to make an appearance?

MS. SUNDT-MCCLARREN: Good morning, Your Honor. Kaitlyn Sundt McClarren, on behalf of AlixPartners.

THE COURT: Good morning.

MS. KARDOS: Good morning, Your Honor. Elizabeth

Kardos, on behalf of AlixPartners, as well. And on the phone -- on the line, as well, is David McGreevey.

THE COURT: Okay. Thank you.

All right. So I wanted to have a status conference on this to, in essence, figure out, you know, how we were going to proceed. I have reviewed the filings by, obviously, the Debtors.

And, Mr. Patterson, do I understand correctly that ModivCare Top Co. was the entity that was created after the bankruptcy? Because it wasn't a Debtor.

MR. PATTERSON: That's correct.

THE COURT: All right. And so is it the Reorganized Debtor or -- I'm trying to -- I tried to look at the LLC agreement this morning.

MR. PATTERSON: Right.

THE COURT: But it was like 300 pages long, so I couldn't get through it. And so I don't quite understand exactly the connection to -- is it the Reorganized Debtor, then?

MR. PATTERSON: That's my understanding, Judge, but I'll tell you, I don't have independent knowledge of that. I'll check with the client, and I can get an actual answer for you. But, like you, I have not read through, and I did not independently verify that information. That's just the way it was explained to us.

THE COURT: Okay. All right. All right. So I did also review the two replies, and I think it probably does make sense to bifurcate this, similar to kind of what we did with the HealthSpring objection. And so -- and there are some issues, you know, at least initially, that are, in my mind, legal matters that we should probably look at first before we end up going the whole route of a, you know, full discovery, you know, and the whole trial on it, which I'm prepared to do if necessary, but at least I want to see if there is -- if there are legal issues that can be resolved without that need at first.

So Mr. Patterson or Ms. Goott, I'd like for you to work with Mr. Zakia to come up with a proposed form of bifurcation order that would allow certain things, you know, to go forward that are really only matter of law. And unfortunately, I thought that once I became a judge, I wouldn't have to go through and look at line-item entries, but I've certainly done that a lot over the years, a lot, a lot. So that is something that, you know, if I have to do, I'll do it, and I'm certainly prepared to do that as well.

The other thing that I noticed, there was a motion filed by one of the parties that is the -- I had approved a fee app for them on an uncontested basis, and they haven't been paid. So I don't know how much money -- monies are still owed to White & Case and Alix, but I don't want, you

know, to the extent I award additional fees, I don't want there to be any issue with the collection of those fees. So I'm inclined to issue an order asking that -- requiring the Debtor to escrow the delta in the fees with the Registry of the Court.

So again, Mr. Patterson or Ms. Goott, if you could work with Mr. Zakia, figure out how much is still owed and put that in the Registry of the Court, you know, subject to my court order.

And then the main reason I wanted to call you all is just to see what's a realistic schedule in terms of, you know, should we just continue this for another week, see where we are on the bifurcation, and then, you know, set a schedule? Obviously, this is going to take some time, and, you know, I want to make sure that I consider everything before I rule.

So that -- those were kind of why I called the status conference, but I'll let you all, you know, go ahead and, you know, where I'm -- where -- what I was thinking about when I called this, so you all can let me know what you think, Mr. Patterson or Ms. Goott.

MR. PATTERSON: I'm happy and I can get corrected by Ms. Goott if I misstate something. Kind of working backwards, I think a status conference is good. I don't think a week -- well, I'm going to be out most of next week,

and so I don't think next week is good, but, you know, the end of the month and --

THE COURT: Yeah. And Mr. Patterson, I want to make sure that everybody has a full say in this. So I'm just saying --

MR. PATTERSON: Sure.

THE COURT: -- I don't, on the one hand, I want to act as expeditiously as possible. Putting the money in the Registry of the Court gives us a little bit more time, but nevertheless, I want to act as expeditiously, but on the other hand, I don't want to at all, you know, curtail everyone's right, so --

MR. PATTERSON: Right. And let me address that. I guess I'm a little uncomfortable in putting the money in the Registry of the Court, and I know the Court saw the Motion to Compel --

THE COURT: Right.

MR. PATTERSON: -- by the real estate professionals, and I did talk to my clients about that motion this weekend. There are specific issues there that is unnecessary for today. I know the Court signed the order. The order -- the fees have been approved, and they're aware of that, but I don't want you to read anything into that to suggest that there are issues with paying professionals that have had their fees approved and then

require to start escrowing disputed amounts of fees.

That motion is going to be addressed, and I would ask the Court not to let that bleed over into anything.

THE COURT: I'm not prejudging anything, but, you know --

MR. PATTERSON: Right.

THE COURT: -- there's an order that was submitted on -- without objection by the Debtor, I signed --

MR. PATTERSON: Right.

THE COURT: -- and, you know, I don't know if there's any issues with it or not, but I don't want this to be a second-round thing, so I'm -- unless --

MR. PATTERSON: Right. Right.

THE COURT: -- there's a compelling reason not to, I'm going to require that the fees be escrowed.

MR. PATTERSON: So I think that the bifurcation is great. I think we're going to need -- well, I don't recall you asking what we'll need, but the bifurcation is fine. We'll work on getting the issues set out. We do have a Motion to Compel that's been filed that we would like a hearing on.

In essence, White & Case has basically said, yeah, we got your request, but we're not giving you anything. We don't think we have to give you anything. That was, in essence, their response, and we don't think that's

appropriate, but, yeah, in a couple of weeks, a status conference, we should have the bifurcation issues at least either resolved or something to give to you to decide on that.

THE COURT: Okay. All right. Mr. Zakia.

MR. ZAKIA: Thank you, Your Honor. So I appreciate the guidance, which is really what we wanted. I do want to address a couple of things. One, I think the bifurcation, which obviously we agree is the best way to proceed here, does certainly streamline the process, which was the point of our suggestion. And in terms of timing, I think it allows us to have a hearing on the Phase 1 issues, the legal issues, and those that have already been dealt with by the factual record in a relatively expeditious timeframe.

Now, if people have scheduling issues or -- that's fine, not looking to, you know, Your Honor's issue on escrow means this is not an emergency. So we can give people the time they need. Mr. Patterson may want to respond to the reply that we filed on Friday. That's fine. But I don't think it should take a huge amount of time before we'll be in a position to present to the Court that kind of -- the legal issues and the findings that the Court can make without additional factual record for Your Honor's consideration.

We believe that's dispositive. Our adversaries obviously disagree. Your Honor will have to decide. Maybe I'm entirely right and that'll end the case. Maybe they're entirely right. It won't narrow anything. Maybe it's somewhere in the middle. Your Honor will tell us where we land. But I think that's something we probably can have a hearing on in the next couple of weeks. And I will commit to working with Mr. Patterson to present an order to the Court, hopefully on agreed terms that lay out how that split and fully reserving all of their rights with regard to discovery.

If Your Honor believes that I'm not correct and we need that, you know, we're not looking -- we -- and this gets a little bit to the Motion to Compel. What we told them, and I won't pre-argue it here, but really two issues that we had.

One, the request as drafted were, we believe, off the charts in terms of unreasonableness. I mean, as Your Honor can imagine, we get nervous about having one or two lawyers as custodians when it comes to the privilege issue and document review. They want every White & Case biller that ever billed time to this kind of, for us to search all their emails to see on the chance someone talked about the fees.

So we had issues with that. But the larger issue

was, we didn't think any discovery was necessary until, not necessarily forever, but until we could get guidance from the Court with regard to what we think of as these Phase 1 issues, which again, we believe can be dispositive. Maybe I'm right. Maybe I'm wrong. So I don't want it to, you know, Mr. Patterson implied that we took kind of a view of, you know, we would not deign to engage with him in discovery. That's not accurate.

What it was is we really wanted to get, kind of, this two stage process, which the Court has now ordered, and I think that positions us to do this as efficiently as possible. So we're happy to respond to the Motion to Compel. I would suggest that that can wait until Phase 2, if Phase 2 comes. If the Court wants us to do it sooner, we're obviously happy to do it whenever Your Honor determines.

But I think the key is for us to get to you an order that presents and lays out the issues that can be considered on the law and the existing factual record and then preserves everybody's rights on everything else in case that does not dispose of the matter. And that's how I propose that we proceed.

THE COURT: All right. Well, go ahead. Do go ahead and respond to the Motion to Compel just so we have that and I have an opportunity to read it. And then we'll

figure out when we take that up, whether we take it up now or we take it up later. But go ahead -- do go ahead and do that. Okay.

So let's just pick a date, not necessarily to be wed to it, but let's just pick a date --

MR. ZAKIA: So Mr. Patterson --

THE COURT: -- for a continued --

MR. ZAKIA: Sorry. Go ahead, Your Honor.

THE COURT: -- for a continued status conference.

MR. ZAKIA: Your Honor, I could be available any day the week of the -- Mr. Patterson indicated he was out next week. So any -- the week of the 20th? Or we could do it the other way, Your Honor. If the point of the status conference is to see if we're able to come to an agreement on a bifurcation order and have Your Honor weigh in if we can't, maybe we could even do that, like, Friday.

THE COURT: I think you're being a little optimistic --

MR. ZAKIA: Okay.

THE COURT: -- that it could be.

MR. ZAKIA: I've been guilty of that before.

THE COURT: I think that's a little optimistic. Let's shoot --

MR. ZAKIA: I'm sorry, Your Honor, I said any day the week of the 20th other than the 20th itself. I do have

a deposition that day -- all day.

THE COURT: So unfortunately, that week is really bad for me. So and then the following week, the first three days are the Southern District Bench Bar. So how about four o'clock on April 30th? That should give plenty of time.

MR. ZAKIA: Okay, Your Honor.

THE COURT: Does that work with you, Mr. Patterson, Ms. Goott? It's a Thursday.

MR. PATTERSON: Yes, sir. April 30th is fine with me.

THE COURT: Okay. All right.

MR. PATTERSON: I don't know about Ms. Goott.

THE COURT: 4:00 p.m. that day.

MR. PATTERSON: And that's just to continue really our discussion we're having today.

THE COURT: Right. Yeah. And then to the extent we need to set hearings and stuff, we'll consider at that point. But hopefully by then we'll have the bifurcation order, a schedule, and then, if need be, once we have the schedule, the briefing schedule, et cetera, then we'll have, you know, we'll set a hearing on the first, kind of, the first phase issues.

MR. ZAKIA: Hey, Your Honor, on our response to the Motion to Compel, is it okay if we do that by this Friday?

THE COURT: Yeah, that's fine.

MR. ZAKIA: Okay. And you're looking --

THE COURT: I mean, I think the Motion to Compel, you get 21 days, so --

MR. ZAKIA: Oh, okay.

THE COURT: Yeah, 21 days, 21, you know.

MR. ZAKIA: Okay. Thank you, Your Honor.

THE COURT: Mr. --

MR. PATTERSON: And you're looking for us to work through -- to identify what we can agree are purely legal issues, which --

THE COURT: Yeah.

MR. PATTERSON: -- right now I'm struggling to come up with them, but --

THE COURT: Well --

MR. PATTERSON: I can be convinced. And then --

THE COURT: Well, I think a determination of the reasonableness of the fees is a legal issue.

MR. PATTERSON: Based upon a factual record, that's right.

THE COURT: Correct. And the factual record is in part the, you know, the fee statements and the activity that happened in the court and, you know, the confirmation hearing, et cetera. I mean, you can certainly, you know, obviously, you argue it, but I think that's basically -- I

don't think, you know, I'm not -- there's no expert testimony needed on -- to determine whether I'm going to make a determination whether the fee is reasonable or not. I mean, I'm the -- that's kind of determination that I make.

MR. PATTERSON: That's the -- yes. But I think -- and I guess where I'm struggling is, I agree with -- I 100 percent agree that this -- that you make the determination of whether the fees are reasonable. But I think the step before that is there's got to be a factual record.

Number one, are the fee statements accurate or correct, and do they contain those things? But also I think there are facts that the Court may be aware of, right? You were there through the whole case --

THE COURT: Right.

MR. PATTERSON: -- and you're aware, but there are things that didn't happen in court or did not appear before you. And I think we're entitled to build the factual record on that. That would be beyond anything that the Court might recall or remember about the case.

THE COURT: Okay. Well --

MR. PATTERSON: So I --

THE COURT: -- yeah, I mean --

MR. ZAKIA: We want to preserve Mr. Patterson's rights to explore that if Your Honor for some reason don’t.

THE COURT: All right.

MR. ZAKIA: Maybe Your Honor is right in my optimism that we can get agreed bifurcation order is optimistic, but we will try. I commit to that.

THE COURT: All right.

MS. GOOTT: I -- Your Honor, if I could --

THE COURT: Yeah.

MS. GOOTT: -- make one comment and I just would like a little bit of guidance for what the expectations are for the bifurcation. I'm also struggling because I cannot -- I don't understand. There's significant pieces of this that I don't know how we'd do that aren't strictly factually based, right? That we don't do without going beyond those time records without putting a witness on the stand --

THE COURT: Well, the --

MS. GOOTT: -- to ask those questions and to --

THE COURT: Give me a for instance.

MS. GOOTT: -- even if it's a --

THE COURT: Give me a for instance.

MS. GOOTT: I'll give you a for instance. Let's say that we have a time entry that says review or -- eight hours prepared a deposition outline. All right? And we have five different depositions of different individuals with the same time entries to depose -- to conduct -- to

create those deposition outlines, right? I want to talk to somebody or review documents and say if 90 percent of your deposition outline was identical, right? Why did it take the same amount of time? Why did you attend?

Why if this entry says that six partners were attending a -- I'm making this up, right? But if we have a time entry that says partner one conducted a deposition, partner two and partner three were there to monitor, right? I want to talk to the monitoring partners. Why were you there? What was the purpose? Why did -- there are so many things that occurred that either this Court was not there or that we don't understand from just reading an outline or the timeline, right?

THE COURT: Understood. And I think you have to look at this in the context of this case. I mean, the Debtor filed. They wanted to have this thing confirmed ASAP. The committee pushed back, pushed back. I ruled in favor of the Debtor and made it go -- I mean, this should have been a year case. It was less than a four-month case, and you had to fit in a year's worth of work in four months, which is in essence what happened here, and I commended the parties for that.

And the issues in my mind were, you know, do -- is it -- do I -- at the end of the day, the decision that I made was whether I gave the Debtor deference on their

projections. And I did, not because, you know, I mean, Alix had done a complete set of projections that were probably just as valid, but I deferred to the Debtor's business judgment. And that's -- and that was kind of the end of -- that was the end of the case, because once you defer to the Debtor's business judgment on their projections, then the values kind of flowed from there.

And that was -- and there was no market test, so you knew it was going to be a valuation fight. Everybody was aware of that. So you know, there was a lot of context here that I'm very familiar with, and you know, and I made specific decisions, for the most part, deferring to the Debtor's business judgment, that allowed this case to go at a speed that was probably, you know, as quick as reasonably possible, giving people opportunities, you know, to have due process.

So you know, under those circumstances, you know, your -- you don't have the opportunity to take a deposition, figure out exactly what they said, then, you know, prepare for the next one based on having, you know, built the process. Everything was happening all at once. So I don't disagree with you, but I think you need to put it into context.

MS. GOOTT: Well, I -- no, I understand that, and I think that there is -- there are a lot of questions that

we have, and maybe at the end of it, we say, okay, maybe for this case, this context makes sense, that we needed eight lawyers to sit through the deposition, because --

THE COURT: Okay.

MS. GOOTT: -- it would have maybe taken more time, right? But what if one of those lawyers was in and out of that deposition, and not paying attention, or doing something different, right? There's a lot of facts here that this Court is not privy to, or what the process is.

Does it take an hour and a half to do a pro hac application? Completely separate and apart from the context of a case moving at this speed, right? There are things that did not occur, and I know that's a small piece, right? But it's one of the factors that this Court determines, and we get to look at the Johnson factors, and if we have someone that spends an hour and a half filling in a form that they've done numerous times before, we get to look at it.

And that's factual. And that -- and I know you don't want to get into the details, but you asked for a for instance, and that is -- that's a simple for instance of a factual issue that couldn't be bifurcated.

THE COURT: Okay.

MS. GOOTT: why do you have four lawyers doing a pro hac is just one small example.

THE COURT: All right.

MR. ZAKIA: So Your Honor, first of all, we understand your ruling. I understand your ruling. I think both Ms. Goott's examples illustrate the wisdom of that ruling. For example, this Court is as experienced as any with regard to how these cases work. If there are time entries they want to argue that's too long, Your Honor may agree with them and say it's too long. You're not allowing it. Your Honor may agree with us, but it's reasonable to allow it. Your Honor might say, you know, on that, I want to know a little bit more on the depositions.

I just want to think about the standard that she set up because fee objections happen in courts all around the country. And never is it I get to depose every single lawyer that worked on the case and ask them, why'd you do this? Why'd you do this? Why do you do that? I think that's a standard.

And again, they can make that argument. Your Honor can consider it. If you agree with them, we'll do it. I just want to recognize the severity of the burden that hypothetical just put on professionals that work in bankruptcy cases in every case forever.

So we think Your Honor -- anyway, you already ruled. So I'm going to stop, but I did want to push back on those two.

THE COURT: All right. All right. So we will -- we'll be in recess 'til April 30th at 4:00 p.m. And hopefully you all will be able to come up with something or at least limit the scope of the disputes.

MR. ZAKIA: Thank you, Your Honor, for your time. Very helpful.

THE COURT: All right. We'll be in recess till ten o'clock.

MR. PATTERSON: Thank you.

MS. GOOTT: Thank you, Your Honor.

(Proceedings concluded at 9:27 a.m.)

* * * * *

I certify that the foregoing is a correct transcript to the best of my ability produced from the electronic sound recording of the proceedings in the above-entitled matter.

/S/ MARY D. HENRY

*CERTIFIED BY THE AMERICAN ASSOCIATION OF ELECTRONIC REPORTERS AND TRANSCRIBERS, CET**337*

JUDICIAL TRANSCRIBERS OF TEXAS, LLC

JTT TRANSCRIPT #70757

DATE FILED: APRIL 16, 2026

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

In Re:	ModivCare Inc. and VRI Intermediate Holdings, LLC Debtor	Case No.: 25−90309 Chapter: 11

NOTICE OF FILING OF OFFICIAL TRANSCRIPT

An official transcript has been filed in this case and it may contain information protected under the E-Government Act of 2002, and Fed. R. Bank. P. 9037.

Transcripts will be electronically available on PACER to the public 90 days after their filing with the court. To comply with privacy requirements of Fed. R. Bank. P. 9037, the parties must ensure that certain protected information is redacted from transcripts prior to their availability on PACER.

If redaction is necessary, the parties must file a statement of redaction listing the items to be redacted, citing the transcript's docket number, the item's location by page and line, and including only the following portions of the protected information. This statement must be filed within 21 days of the transcript being filed. A suggested form for the statement of redaction is available at https://www.txs.uscourts.gov/.

- the last four digits of the social security number or taxpayer identification number;
- the year of the individual's birth;
- the minor's initials;
- the last four digits of the financial account number; and
- the city and state of the home address.

Any additional redaction requires a separate motion and Court approval.

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- opening and closing statements made on the party's behalf;
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Nathan Ochsner
Clerk of Court

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

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

WHITE & CASE LLP'S OBJECTION TO
MODIVCARE TOPCO, LLC'S MOTION TO COMPEL

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, respectfully submits this objection to *Modivcare TopCo, LLC's Motion to Compel White & Case, LLP to Respond to Discovery Requests* [Dkt. No. 1409] (the "Motion to Compel") filed by ModivCare TopCo, LLC ("TopCo").[2]

PRELIMINARY STATEMENT

1. TopCo's objection to the W&C Fee Application is an unprecedented effort to disallow every dollar of fees earned by Committee counsel on the basis that counsel's work was entirely frivolous. TopCo relies on a single statement allegedly made by a White & Case lawyer in the course of settlement discussions regarding prospective litigation costs as evidence of an

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in *White & Case LLP's Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Dkt. No. 1410] (the "Reply") or *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Dkt. No. 1290] (the "W&C Fee Application"), as applicable.

alleged threat to pursue frivolous litigation. As explained in the Reply, the Federal Rules prevent the admission or consideration of the alleged statement, and the statement was neither sinister nor improper. TopCo nevertheless asks the Court to allow a fishing expedition through practically every file counsel generated in these chapter 11 cases and files from unrelated chapter 11 cases to develop its implausible and misguided narrative. And TopCo insists that it needs to do this now, before the Court has determined whether it can dispose of the fee objections based on the law and existing factual record.

2. The Court should deny the Motion to Compel for at least four reasons. *First*, the Court has already determined that it may be able to rule on the W&C Fee Application based on governing law, the comprehensive record in these chapter 11 cases, and the W&C Fee Application itself. *Second*, the Court has already determined that the Committee's confirmation objection was not frivolous, gutting the premise on which the fee objection is based. *Third*, TopCo's objection to the W&C Fee Application does not raise any legitimate issues of fact that would compel discovery, and courts routinely resolve objections like TopCo's on the existing record. The Court should follow the same process here, where TopCo has not even objected to specific time entries and instead pursues its baseless argument that all the fees should be disallowed. *Fourth*, TopCo's requests are overbroad and seek documents that are obviously protected from disclosure.

3. Alternatively, if the Court is not prepared to deny the Motion to Compel now, it should defer consideration until after the initial phase of this dispute.

BACKGROUND

4. White & Case served as counsel to the statutorily-appointed Committee throughout these chapter 11 cases in accordance with a retention order this Court entered without objection. *See Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* [Dkt. No. 616]. White & Case worked diligently to fulfill its fiduciary

obligations to unsecured creditors. It filed Monthly Fee Statements and one Interim Fee Application in these chapter 11 cases reflecting this work.[3] No party objected to the Monthly Fee Statements or the Interim Fee Application. White & Case then filed the W&C Fee Application, which, in over fifty pages, detailed the benefits conferred on the estate, the work performed and its necessity, and included a comprehensive summary of expenses incurred. *See* W&C Fee Application.

5. TopCo filed the *Objection to Final Fee Application Filed by White & Case, LLP* [Dkt. No. 1354] (the "Fee Objection"). The Fee Objection argues that White & Case should not get paid for its work. *See generally* Fee Objection. It relies on baseless arguments and fabricated figures, as explained in detail in the Reply. *See* Reply ¶¶ 13-39.

6. On March 12, 2026, TopCo served sixteen overbroad and irrelevant discovery requests on White & Case, many of which sought all internal communications among White & Case personnel concerning various topics related to its representation of the Committee (the "Requests"), attached as **Exhibit A**. Other Requests seek *all* orders, opinions, and pleadings from *any* bankruptcy court in *any* case in which White & Case has *ever* served as counsel and *any* party alleged billing impropriety or sought fee reductions. *See* Ex. A at 5.

[3] *White & Case LLP's First Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including September 30, 2025* [Dkt. No. 684] (the "First Monthly Fee Statement"); *White & Case LLP's Second Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2025 to and Including October 31, 2025* [Dkt. No. 882] (the "Second Monthly Fee Statement"); *White & Case LLP's Third Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 to and Including November 30, 2025* [Dkt. No. 957] (the "Third Monthly Fee Statement"); *White & Case LLP's Fourth Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2025 to and Including December 29, 2025* [Dkt. No. 1197] (the "Fourth Monthly Fee Statement" and, collectively with the First Monthly Fee Statement, Second Monthly Fee Statement, Third Monthly Fee Statement, the "Monthly Fee Statements"); *White & Case LLP's First Interim Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including November 30, 2025* [Dkt. No. 1000] (the "Interim Fee Application").

7. On April 2, 2026, White & Case served TopCo with responses and objections to the Requests (the "R&Os"), attached as **Exhibit B**. White & Case contended that the Requests were overbroad, not proportional to the needs of resolving the W&C Fee Application, and, critically, that internal law firm documents during an active engagement *about that engagement* are privileged. *See* Ex. B at 7-11, 14-21. Based on the overbreadth of the Requests and the fact that the vast majority of responsive documents are either privileged or publicly available, after lodging Request-specific objections, White & Case responded: "Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time." *Id.* at 8-22.

8. That same day, the parties met and conferred. White & Case's position was straightforward: this Court can resolve the W&C Fee Application based on the law and the existing record without any additional discovery and, if the Court disagrees, it can provide guidance on the proper scope before the parties expend exorbitant time and resources on discovery. *See generally* Reply. TopCo rejected that position. It asserted (without supporting authority) that the R&Os failed to comply with applicable rules, insisted that White & Case could not object to the Requests without first identifying the universe of responsive documents and producing a privilege log, and argued that there was no need to negotiate custodians because the Requests made clear that they expected ***all 54 timekeepers*** that billed to the matter to be custodians. White & Case explained that the burden of collecting emails and documents across all 54 timekeepers is clear and would generate an overwhelming volume of documents requiring a privilege review.

9. On April 3, 2026, TopCo filed the Motion to Compel.

10. On April 6, 2026, the Court held a status conference and stated that it will consider the W&C Fee Application in two phases. *See* Hr'g Tr. (Apr. 6, 2026) at 5:1-20. In the first phase, the Court will make all determinations on the relief requested based on applicable law, the W&C Fee Application, and the existing evidentiary record. If any issues remain, the Court will conduct a subsequent evidentiary hearing, with the terms of any necessary discovery to be addressed after the initial phase. TopCo is seeking reconsideration of that ruling. *See Modivcare Topco, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Dkt. No. 1427] ("Motion to Reconsider").

ARGUMENT

I. The Court Can and Should Resolve the W&C Fee Application Without the Requested Discovery

11. Courts routinely rule on fee applications based on the supporting detail and the existing record from the case alone, without the need for additional evidence.[4] White & Case filed Monthly Fee Statements, the Interim Fee Application, and the W&C Fee Application, including detailed and specific time entries reflecting the firm's work in six-minute increments, breakdown of the matter categories and timekeepers, and details of the expenses. *See* Monthly Fee Statements Ex. C; Interim Fee Application Exs. A-D; W&C Fee Application Exs. A-E. In addition to these supporting documents, the Court presided over the entirety of these chapter 11 cases. White & Case's work culminated in the Committee's plan objection and the five-day confirmation hearing where the Committee put forth its valuation case. The Court found the Committee's methods

[4] *See, e.g.*, *In re Lawler*, 807 F.2d 1207, 1211–12 (5th Cir. 1987) (upholding the bankruptcy courts finding that "the time logs presented by the applicants with their application describe the services rendered by the applicants in sufficient detail and, together with the record of this case, adequately inform the Court as to the extent and quality of the applicants' services"); *Wells Fargo Bank, N.A. v. Jones*, 391 B.R. 577, 591 (E.D. La. 2008) ("[T]he Fifth Circuit has ruled that the submission of legal invoices is sufficient evidence to affirm a district court's fee award . . . . [T]he Court finds sufficient evidence of legal invoices, billing, and record keeping to uphold the Bankruptcy Court's award.") (citing *K3C Inc. v. Bank of Am., N.A.*, 204 F. App'x 455, 466–67 (5th Cir. 2006)).

"valid" and its expert "credible." *See* Hr'g Tr. (Dec. 12, 2025), at 8:21-24, 9:7-11. In overruling the Committee's objection, the Court deferred to the Debtors' business judgment as to their financial projections and the impact of such projections on enterprise value. *See id.* at 6:2-9. The Court is best positioned to determine based on the existing record whether the Committee took frivolous legal positions contrary to the interests of the estates. The Court has already held that it may be able to rule on the W&C Fee Application without further discovery. *See* Hr'g Tr. (Apr. 6, 2026) at 5:1-20.

12. TopCo does not object to a single time entry, but nevertheless argues that it needs to know "how [White & Case's] purported fees were generated." *See* Mot. to Compel ¶¶ 6, 9, 65. White & Case's detailed time entries provide clear explanation of the work performed, the people who performed that work, the amount of time each person spent on each task, and each timekeeper's billing rate. Any internal communications regarding staffing decisions or guidance for performing assigned tasks is neither relevant nor necessary to the issue before the Court, and those communications would disclose privileged legal strategy. *Hickman v. Taylor*, 329 U.S. 495, 510–11 (1947) ("In performing his various duties, however, it is essential that a lawyer work with a certain degree of privacy, free from unnecessary intrusion by opposing parties and their counsel. Proper preparation of a client's case demands that he assemble information . . . *prepare his legal theories and plan his strategy* without undue and needless interference.") (emphases added); *Cedrone v. Unity Sav. Ass'n*, 103 F.R.D. 423, 429 (E.D. Pa. 1984) ("[I]t is inconceivable that an internal memorandum between attorneys in the same office concerning the representation of a client, utilizing confidential information provided by that client, could be anything but protected by the privilege.").

13. The Court has an extensive record on which it can make its decision, including detailed fee statements, pleadings, deposition transcripts, expert reports, oral arguments, and the benefit of a five-day confirmation hearing where the Committee presented its arguments. No further discovery is needed.

II. TopCo's Requests Are Overbroad and Improper

14. Federal Rule 26(b)(1) limits discovery to "any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case." *See* Fed. R. Civ. P. 26(b)(1); Fed. R. Bankr. P. 7026; *see also* Fed. R. Civ. P. 26(g)(1) (requesting party must ensure each discovery request is "not interposed for any improper purpose" and is "neither unreasonable nor unduly burdensome"); *Gondola v. USMD PPM, LLC*, 223 F. Supp. 3d 575, 580–81 (N.D. Tex. 2016) (noting that "the party seeking discovery is required to comply with Rule 26(b)(1)'s proportionality limits" by certifying that the request is "neither unreasonable nor unduly burdensome or expensive"). The burden is on the party seeking discovery to make the requests reasonable and readily understandable. *See Lopez v. Don Herring Ltd.*, 327 F.R.D. 567, 575 (N.D. Tex. 2018) (explaining that requests for production must be made with "reasonable particularity" so the responding party does not have to "ponder" or "speculate in order to decide what is and what is not responsive") (quotations omitted) (citations omitted); *see also Bajaria v. Wal-Mart Stores Tex., LLC*, No. 4:24-CV-311, 2025 WL 871621, at *1 (E.D. Tex. Mar. 20, 2025) ("The moving party bears the burden of showing that the materials and information sought are discoverable.") (citing *Export Worldwide, Ltd. v. Knight*, 241 F.R.D. 259, 263 (W.D. Tex. 2006)). The request must also not infringe on the attorney client privilege or attorney work product. *See Hickman*, 329 U.S. at 510 ("Not even the most liberal of discovery theories can justify unwarranted inquiries into the files and the mental impressions of an attorney.").

15. TopCo's suggestion that White & Case should have unilaterally narrowed the Requests to try to get them within a reasonable scope flips the burden. *See* Mot. to Compel ¶ 49 ("White & Case never proposed any limitation to this request."). The onus to provide reasonable and understandable requests is on the party seeking production. *See Lopez*, 327 F.R.D. at 575–76; 8A Wright & Miller's Federal Practice & Procedure § 2211 ("Many cases have said that the things to be produced should be described with reasonable particularity."). TopCo's position also rings hollow because it has insisted that the Requests are to be responded to as drafted. *See* Mot. to Compel ¶¶ 4, 31, 39 (mischaracterizing the Requests as "narrowly tailored" and "limited"). During the parties' meet and confer, TopCo stated that all 54 timekeepers must serve as document custodians.[5] For each Request that seeks all communications among White & Case employees (more than half of the Requests), White & Case would be required to perform a document-by-document privilege review, rendering compliance extraordinarily burdensome and disproportionate to any legitimate need. *See, e.g.*, *Panini Am., Inc. v. Fanatics, Inc.*, No. 23-CV-09714-LTS-VF, 2026 WL 146004, at *2 (S.D.N.Y. Jan. 20, 2026) (upholding the magistrate judges finding that "it is not readily apparent that [the] disputed custodians will have unique, relevant documents not captured by [the] proposed custodians" and thus "the discovery sought was not proportional to the needs of the case"); *Dale v. Deutsche Telekom AG*, No. 22 C 3189, 2024 WL 4416761, at *3 (N.D. Ill. Oct. 4, 2024) ("[F]rankly, fifty custodians is a lot. And, it's really a lot when they are essentially all of the requesting parties' choosing.").

[5] TopCo seeks documents from all "White & Case Personnel," which it defines as "any partner, associate, counsel, staff attorney, paraprofessional, legal assistant, project manager, litigation specialist, billing coordinator, finance department employee, or any other person employed by or affiliated with White & Case LLP who performed any function in connection with the Engagement." Ex. A, Requests at 2. White & Case objected to this definition "as vague and ambiguous, overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application, because it purports to include 'any other person . . . affiliated with White & Case.'" Ex. B, R&Os at 6. White & Case instead proposed a more reasonable definition of referring to those employed by White & Case. *Id.*

16. TopCo fails to articulate why its Requests are proper. Specifically:

a) Requests 1-3, 13-14. TopCo seeks communications concerning internal staffing and management decisions. Mot. to Compel ¶¶ 33-38. White & Case's staffing decisions are not relevant to the Court's inquiry under section 330(a)(3) of the Bankruptcy Code.[6] The benefit of any such discovery to TopCo is disproportional to the burden on White & Case given the substantial time it would take to collect all such materials. Any responsive documents would be subject to privilege and protection from disclosure.[7]

b) Request 4. TopCo seeks communications related to the supposed statement made in a settlement meeting regarding the cost of litigation,[8] arguing that the Request expressly excludes counsel's "legal strategy or mental impressions." *Id.* ¶¶ 40-41. But there is no search that can filter a lawyer's mental impressions

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[6] *See* 11 U.S.C. § 330(a)(3) (listing six factors to consider when analyzing "reasonable compensation," including the time and rates charged, the necessity and benefit of the services, the efficiency with which they were performed given the case's complexity, the professional's expertise, and whether the requested fees are consistent with those charged by similarly skilled practitioners outside of bankruptcy.).

[7] TopCo's argument that internal billing and staffing communications "do not, in the ordinary course, involve client confidences or legal advice and therefore are not protected by the attorney-client privilege" or the work-product doctrine fundamentally misunderstands how work is allocated among large teams in law firms. *See* Mot. to Compel ¶¶ 33-38.

[8] TopCo claims that the alleged threat was made during a global settlement conference and in "further phone conversations" or "separate communications" with unidentified "counsel for the Consenting Creditors." *See* Fee Objection ¶¶ 15-17; Mot. to Reconsider ¶ 25. Presumably, this refers to Kris Hansen of Paul Hastings LLP, former counsel to the Consenting Creditors, with whom all substantive conversations regarding resolution of the cases occurred. For all the reasons explained in this objection and the Reply, the W&C Fee Application and Fee Objection can and should be resolved without any discovery concerning these settlement discussions. But if that discovery does occur it will show that every conversation between White & Case and Mr. Hansen was courteous, forthright and professional. It will also show that Mr. Hansen and Debtors' counsel, George Klidonas, accurately understood the legitimate point being made by White & Case during these settlement discussions and in no case ever felt threatened or extorted. Discovery would have to include testimony from all of these lawyers concerning the settlement conduct of all parties, including that of the Consenting Creditors, to understand the true reason why this matter did not settle. Rule 408 closes that door for a reason. The Court should follow Rule 408 and not allow that unnecessary and expensive exercise. *See* Reply ¶¶ 13-19.

from its preparation for a settlement meeting. Any such communications are litigation strategy by their very nature.

c) Requests 5-7. TopCo demands that White & Case produce publicly filed documents concerning objections to its fees in all cases *other than this one* in an effort to unearth "a broader, repeated pattern" of "similar misconduct." *Id.* ¶¶ 45-55. This Request bears no relevance as to whether the documented fees in these cases are reasonable under section 330 of the Bankruptcy Code. TopCo states that "ModivCare has no way of knowing which cases to search for." *Id.* ¶ 52. TopCo's counsel presumably has access to the same legal research platforms that White & Case would use to respond to this inquiry, which has no temporal, geographic, or subject matter limitation. TopCo can conduct its own diligence if it wants to argue a pattern of conduct.

d) Request 8. TopCo states that it is entitled to communications regarding the Consenting Creditors' reservation of rights, filed in response to White & Case's Interim Fee Application. *Id.* ¶¶ 56-66. TopCo is capable of reviewing the W&C Fee Application to determine if the firm altered its billing and staffing practices following the reservation of rights. Any internal communications would necessarily implicate legal strategy.

e) Request 9. TopCo argues that it is entitled to all communications concerning preparation of the W&C Fee Application as probative of whether the W&C Fee Application accurately reflects work performed, including whether time entries were reassigned across project codes or allocated across multiple categories. *Id.* ¶¶ 67-71. As an initial matter, any drafts or communications concerning the

strategy of any pleadings is protected from disclosure as privileged. *See BankDirect Cap. Fin., LLC v. Cap. Premium Fin., Inc.*, 326 F.R.D. 176, 183 (N.D. Ill. 2018) ("[A]lmost all courts have concluded that the process of drafting and editing, reflecting as it often does both requests for and provision of, legal advice, is protected by the attorney-client privilege."); *Cedrone*, 103 F.R.D. at 429 ("[I]t is inconceivable that an internal memorandum between attorneys in the same office concerning the representation of a client . . . could be anything but protected by the privilege."). Regardless, TopCo did not object to any specific time entries, and it is not entitled to additional discovery to argue that they are not accurate or properly categorized.

f) Request 10. TopCo claims that it is entitled to "[a]ll deposition outlines" to determine if the work product justified the amount of time spent, as if that removes such materials from the definition of attorney work product. *Cf. United States v. Textron Inc. & Subsidiaries*, 577 F.3d 21, 26 (1st Cir. 2009) (listing "outlines of cross examination" as a quintessential type of attorney work product); *In re Kaiser Aluminum & Chem. Co.*, 214 F.3d 586, 593 (5th Cir. 2000) (noting that work product privilege applies "as long as the primary motivating purpose behind the creation of the document was to aid in possible future litigation" (quoting *United States v. El Paso Co.*, 682 F.2d 530, 542 (5th Cir. 1982) (quoting *United States v. Davis*, 636 F.2d 1028, 1040 (5th Cir. 1981)))). Deposition outlines reflect counsel's strategic judgment about which witnesses to examine, which topics to pursue, what documents are considered of the utmost importance, and how to sequence questions. TopCo's suggestion

that White & Case may simply "redact" mental impressions from a deposition outline fundamentally misunderstands that a deposition outline is, in its entirety, attorney mental impressions. The Request also has no legitimate purpose and seeks only proof that deposition outlines were created. The proof is in the W&C Fee Application and the sixteen deposition transcripts that show counsel's work.

g) Requests 15-16. TopCo claims that it is entitled to time entry metadata to determine whether time entries were recorded contemporaneously or reconstructed, whether entries were modified before submission, and whether the W&C Fee Application reflects actual work performed. Mot. to Compel ¶¶ 79-87. TopCo argues that the burden is minimal and that law firms typically maintain this information as part of standard billing practices. *Id.* ¶ 83. It is not. These Requests seek forensic-level billing system data—audit trails, metadata, and modification histories across 54 timekeepers over a 111-day engagement—that goes far beyond anything proportional to a fee application dispute. The existing record, including the detailed time entries submitted with each of the Monthly Fee Statements, is more than sufficient for this Court to assess the reasonableness of White & Case's fees.

III. White & Case's Responses and Objections Are Proper.

17. The Motion to Compel is replete with mischaracterizations of applicable law and unclear assertions, particularly related to privilege, general objections, and their assertions that White & Case needs to quantify the costs or run searches to show a burden under Federal Rule of Civil Procedure 26(g). *See generally id.*

18. ***First***, regarding the privilege objections in the R&Os, TopCo states that "internal communications regarding billing practices, staffing, and fee preparation . . . . do not implicate privileged legal advice." *Id.* ¶ 27. As explained above, that position is wrong as a matter of law. *See supra* ¶ 16. TopCo further argues that because White & Case had a "blanket" privilege objection, that attorney client privilege has been "waived." Mot. to Compel ¶ 28. This assertion has no support in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, or any other authority. *See* Fed. R. Civ. P. 26(b)(3)-(5), 34(b)(2)(D); Fed. R. Evid. 502. A blanket privilege assertion does not waive privilege—it preserves it, pending the ordinary process by which parties negotiate the scope of production, agree on custodians and search terms or take their issues to the court, collect documents, and then produce a privilege log identifying specific documents withheld. Finally, for Requests that did not appear to limit the scope of relevant documents to those within White & Case's possession, as a courtesy, White & Case specifically referenced in the R&Os that there are non-privileged documents in the Reorganized Debtors' possession that would be responsive to that request. *See, e.g.*, Ex. B, R&Os at 17-18 (Request 11).

19. ***Second***, TopCo's allegations that "general" and "boilerplate" objections are improper misunderstands the rules. Mot. to Compel ¶ 19. General objections are disfavoured when they are divorced from the requests at issue. *Disedare v. Brumfield*, No. 22-2680, 2023 WL 3496395, at *5 (E.D. La. May 17, 2023) ("[G]eneral objections must raise specific objections and correspond to specific discovery requests. Where a general objection is connected both to the facts of the case and specific discovery requests, they are proper . . . .") (footnote omitted); *Amos v. Taylor*, No. 4:20-CV-7-DMB-JMV, 2020 WL 7049848, at *8 (N.D. Miss. Dec. 1, 2020) (noting that general objections "serve as an efficient response" as long as they raise "specific objections" that correspond to "specific discovery requests"); *Mahalingam v. Wells Fargo Bank, N.A.*, 349

F.R.D. 127, 143 (N.D. Tex. 2023) ("For objections that deserve the label 'boilerplate,' counsel's repeating them in response to more than one discovery request is not the problem; counsel's failing to explain the basis for them as to each individual discovery request is."). That is simply not the case here. Each general objection in the R&Os was asserted because it applies across all sixteen Requests. *See, e.g.*, Ex. B, R&Os at 3 (objecting that the Requests lack the typical instruction of applying a temporal limitation across all requests unless otherwise noted); *id.* at 2 (objecting because each of the sixteen Requests begin with the facially overbroad and disfavoured "all" documents or communications); *id.* (objecting because no additional discovery is necessary to resolve the W&C Fee Application so the burden to collect and review any documents is not proportional to the needs of the case); *id.* at 3 (objecting because the Requests target facially privileged documents and attorney work product).

20. TopCo's sole authority for its argument is easily distinguishable. *See Heller v. City of Dallas*, 303 F.R.D. 466 (N.D. Tex. 2014). In *Heller*, the court had already granted in part a motion to compel and found that the defendant failed to consider whether there was "a factual basis for an objection" or to explain how any "request exceeds or conflicts with the scope of permissible discovery." *Id.* at 484, 491. That is simply not the case here where each R&O detailed the grounds for the objection for each Request. *See* Ex. B, R&Os at 7-22. And in doing so, the R&Os complied with the standards the *Heller* court enumerated: "A party served with written discovery must . . . affirmatively explain what portion of the interrogatory or document request is not objectionable and the subject of the answer or response, and affirmatively explain whether any responsive information or documents have been withheld." *Id.* at 484. Moreover, the *Heller* court found the defendant's privilege assertions permissible and refused to grant sanctions for the generalized objections. *Id.*

21. ***Third***, TopCo provides no support for its assertion that a party "cannot claim that a request is unduly burdensome while simultaneously admitting that it has not conducted any search for responsive documents." Mot. to Compel. ¶ 36. This is not surprising. The Federal Rules provide that objections to discovery requests need only be a "belief formed after a reasonable inquiry." Fed. R. Civ. P. 26(g). The advisory committee note explains that "the duty to make a 'reasonable inquiry' is satisfied if the investigation undertaken by the attorney and the conclusions drawn therefrom are reasonable under the circumstances." Fed. R. Civ. P. 26(g), Advisory Committee's Note (1983). White & Case does not need to quantify the costs and run searches to illustrate its burden to comply with the Requests. The burden is clear. Collecting tens of thousands electronic communications, drafts of pleadings, internal memoranda, deposition materials, and other documents from 54 custodians across a complex restructuring engagement would undoubtedly be burdensome. That burden is then compounded by the fact that a document-by-document privilege review will be necessary before any production could be made. Under TopCo's logic, parties subject to a discovery request would have to suffer the burden of the very discovery they object to before they can make a permissible objection. This is not the law.

CONCLUSION

22. The Court has all of the necessary information to adjudicate the W&C Fee Application. Even if the Court decides that discovery is warranted, TopCo's Requests are untenable, and White & Case's R&Os are proper. For the foregoing reasons, White & Case respectfully requests that the Court deny the Motion to Compel, or, alternatively, defer consideration until the Court determines that it requires additional evidence to adjudicate the W&C Fee Application.

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April 24, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on April 24, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

EXHIBIT A

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

MODIVCARE TOPCO, LLC'S REQUESTS FOR PRODUCTION TO WHITE & CASE, LLP

To: White & Case, LLP via U.S. mail to 1221 Avenue of the Americas, New York, New York 10020, and via email to the following individuals on March 12, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

Pursuant to FED. R. CIV. P. 34, ModivCare Topco, LLC (**"ModivCare"**) serves this Requests for Production to White & Case, LLP (**"W&C"**). W&C's responses shall be served on ModivCare through its attorneys, Walker & Patterson, P.C. c/o Miriam T. Goott, by electronic transmission at mgoott@walkerandpatterson.com, within thirty (30) days of service of these Requests.

DEFINITIONS AND INSTRUCTIONS

For purposes of these Request for Production, the following definitions apply:

1. **"Billing Practices"** means any policies, directives, instructions, guidance, goals, targets, expectations, or commentary relating to the recording of time, the volume of hours billed or to be billed, the staffing of matters or tasks, the number of timekeepers assigned to any task or matter, the rates charged, voluntary reductions or write downs, or the review, revision, or editing of time entries.

2. **"Communication"** means any email, memorandum, instant message, text message, Slack message, Microsoft Teams message, or other written or electronic correspondence. Nothing in this definition is intended to require the production of communications protected by the attorney-client privilege or attorney work-product doctrine concerning legal strategy or mental impressions regarding the substantive legal issues in the Engagement.

3. **"Engagement"** means White & Case's retention as counsel to the Official Committee of Unsecured Creditors in In re ModivCare Inc., Case No. 25-90309, filed in the United States Bankruptcy Court for the Southern District of Texas.

4. **"Final Fee Application"** means the White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period September 9, 2025 through December 29, 2025 filed by White & Case at ECF No. 1290.

5. **"Objection"** means the objection filed at ECF No. 1354 to White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period September 9, 2025 through December 29, 2025 filed by White & Case at ECF No. 1290.

6. **"White & Case Personnel"** means any partner, associate, counsel, staff attorney, paraprofessional, legal assistant, project manager, litigation specialist, billing coordinator, finance department employee, or any other person employed by or affiliated with White & Case LLP who performed any function in connection with the Engagement.

7. **"Deposition Materials"** means any outline, script, question list, topic list, memorandum, template, or other preparatory document created, drafted, revised, or used by any White & Case Personnel in connection with the preparation for or conduct of any deposition taken during the

Engagement, including any subsequent iteration, revision, or adaptation of any such document for use in a later deposition.

INSTRUCTIONS

To the extent White & Case withholds any responsive document on the basis of attorney client privilege or work product protection, White & Case shall produce a privilege log identifying each withheld document by date, author, recipient, subject matter, and the specific privilege asserted.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All Communications among White & Case Personnel concerning Billing Practices in connection with the Engagement, including but not limited to any communications regarding the volume of hours to be billed to the Engagement, any targets or expectations regarding fees to be generated from the Engagement, or any instructions or guidance regarding increasing or decreasing the amount of time recorded by any timekeeper on any task or matter.

REQUEST NO. 2:

All Communications among White & Case Personnel concerning the staffing of the Engagement, including but not limited to any communications regarding the number of timekeepers to be assigned to any hearing, deposition, committee call, drafting task, or document review project, or any communications regarding whether particular timekeepers should bill time to the Engagement or to any particular task within the Engagement.

REQUEST NO. 3:

All Communications among White & Case Personnel concerning the review, revision, editing, reduction, or write down of time entries recorded in connection with the Engagement, including but not limited to any communications regarding the "voluntary reductions" referenced in the Final Fee Application, any communications identifying specific entries to be reduced or written off, any communications regarding whether particular time entry descriptions should be revised before submission, and any communications regarding the criteria applied in determining which entries to reduce.

REQUEST NO. 4:

All Communications among White & Case Personnel concerning the $30 million demand referenced in the Objection, to the extent such communications relate to Billing Practices or the relationship between the demand and the anticipated or actual level of professional fees in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions.

REQUEST NO. 5:

All orders, opinions, rulings, or decisions issued by any bankruptcy court in any case in which White & Case LLP served as counsel, that reduced, denied, or disallowed fees or expenses sought by White & Case on the basis of overstaffing, excessive billing, duplicative services, block billing, vague or insufficient time entries, unnecessary litigation, scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate, or any other billing practice or litigation conduct that resulted in a judicial finding that fees requested by White & Case were unreasonable, unnecessary, or otherwise not compensable.

REQUEST NO. 6:

All pleading filed in any bankruptcy court in any case in which White & Case LLP served as counsel that alleged or asserted that White & Case LLP: (a) overstaffed matters; (b) excessively billed; (c) duplicated services; (d) engaged in block billing; (e) submitted vague or insufficient time entries; (f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate.

REQUEST NO. 7:

All pleadings filed in any bankruptcy court in any case in which White & Case LLP served as counsel in which any party requested, sought, or argued for the reduction, denial, modification, or disallowance of any attorney's fees or costs requested by White & Case LLP, regardless of whether such request or objection was sustained, overruled, or otherwise resolved.

REQUEST NO. 8:

All Communications among White & Case Personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent such communications relate to Billing Practices, staffing decisions, or the volume of fees being generated in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions regarding the substantive

response to the Statement, but solely communications regarding whether and how the Statement should affect billing or staffing decisions.

REQUEST NO. 9:

All Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application, including but not limited to any communications regarding the assignment or reassignment of time entries to project codes or billing categories, any communications regarding the allocation of time entries across multiple project categories, any communications regarding the "overlap" between project categories that White & Case acknowledges in the Final Fee Application, any communications regarding which project code a particular time entry should be billed to or categorized under, any communications regarding the narrative descriptions included in the Final Fee Application, and any communications regarding how the work performed by White & Case Personnel should be presented, described, or organized in the Final Fee Application.

REQUEST NO. 10:

All deposition outlines prepared, drafted, revised, or used by any White & Case Personnel in connection with any deposition taken during the Engagement. White & Case may redact portions of any deposition outline reflecting attorney strategy, confidential client information, or other protected work product to address any privilege concerns.

REQUEST NO. 11:

All documents sufficient to show any internal budget, fee estimate, fee projection, or anticipated fee range prepared, drafted, or considered by White & Case LLP in connection with the Engagement, regardless of whether such budget, estimate, projection, or range was finalized, approved, or filed.

REQUEST NO. 12:

All Communications among White & Case Personnel concerning whether a budget, fee estimate, fee projection, or anticipated fee range should be prepared or filed in connection with the

Engagement, including any Communications discussing reasons for preparing, not preparing, filing, or not filing such a budget or estimate.

REQUEST NO. 13:

All Communications among White & Case Personnel concerning whether the professional fees incurred or anticipated to be incurred in connection with the Engagement were excessive, unusually high, disproportionate to the matters at issue, likely to draw objection, or otherwise at risk of reduction or disallowance by the Court.

REQUEST NO. 14:

All Communications among White & Case Personnel concerning the entry of time after the work was performed, including any Communications concerning delayed time entry, reconstruction of time entries, or instructions to enter time for prior dates.

REQUEST NO. 15:

All documents sufficient to show the date and time each time entry billed to the Engagement was created, entered into White & Case LLP's billing system, modified, or submitted for billing, including any audit logs, metadata, or system reports reflecting the creation, modification, and history of such entries.

REQUEST NO. 16:

All documents sufficient to identify the billing or timekeeping system used by White & Case LLP in connection with the Engagement,

Dated: March 12, 2026

Respectfully submitted,

By: */s/ Miriam Goott*
Miriam T. Goott
Attorney-in-charge
SBN 24048846
COUNSEL FOR MODIVCARE TOPCO, LLC

OF COUNSEL:
Walker & Patterson, P.C.
P.O. Box 61301
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(713) 956-5577 (telephone)
mgoott@walkerandpatterson.com

CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the foregoing **Requests for Production** has been served upon White & Case LLP, via U.S. mail at 1221 Avenue of the Americas, New York, New York 10020, and via email to the following individuals on March 12, 2026:

- Charles Koster (charles.koster@whitecase.com)
- Ashley Chase (ashley.chase@whitecase.com)
- Scott Greissman (sgreissman@whitecase.com)
- Gregory F Pesce (gregory.pesce@whitecase.com)
- Christopher Shore (cshore@whitecase.com)
- Jason N. Zakia (jzakia@whitecase.com)
- Andrew Zatz (azatz@whitecase.com)

By: */s/ Miriam T. Goott*
Miriam T. Goott

EXHIBIT B

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)
Debtors.[1]	)	(Jointly Administered)

WHITE & CASE, LLP'S RESPONSES AND OBJECTIONS TO THE REORGANIZED DEBTORS' REQUESTS FOR PRODUCTION

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (the "**Federal Rules**"), made applicable to this matter by Rules 7026, 7034, and 9014 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), White & Case, LLP ("**White & Case**"), by and through its undersigned counsel, hereby responds and objects (the "**Responses and Objections**") to *ModivCare TopCo, LLC's Requests for Production to White & Case, LLP* (the "**Requests**," and each a "**Request**") served by the reorganized debtors of the above-captioned debtors and debtors in possession (the "**Reorganized Debtors**") on March 12, 2026.

GENERAL OBJECTIONS

The following general objections ("**General Objections**") apply to each definition ("**Definition**"), instruction ("**Instruction**"), and Request, and shall have the same force and effect as if fully set forth in the response to each individual Request. To the extent that White & Case responds to a Request, White & Case reserves all objections as to relevance, materiality, competence, confidentiality, propriety, privilege, and admissibility, as well as to any and all other

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

objections on any ground that would require or permit the exclusion of the response, or any portion of the response, if the response were offered into evidence. White & Case objects as follows:

1. White & Case objects to each Definition, Instruction, and Request to the extent they purport to impose different or broader requirements or obligations than those contained in the Federal Rules, the Bankruptcy Rules, the Local Rules of the United States District Court for the Southern District of Texas, the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas, or any other applicable law, rule, or order of this Court (collectively, the "**Rules**"). White & Case will construct and respond to the Requests in a manner consistent with White & Case's obligations under the Rules.

2. White & Case objects to the Requests to the extent that they purport to require White & Case to conduct anything beyond a reasonable search for readily accessible information relevant, probative, and proportional to the needs of assessing the relief sought in *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Dkt. No. 1290] (the "**W&C Fee Application**").

3. White & Case objects to the Requests to the extent that they are overbroad, unduly burdensome, cumulative, or duplicative, not proportional to the needs of the case, or designed to harass White & Case. White & Case objects to the Requests to the extent that they call for the production of "all" or "any" Documents pertaining to a subject on the grounds that such Requests are overly broad, unduly burdensome and not proportional to the needs of the case so as to make it impossible to identify the limits of the inquiry. To the extent White & Case produces documents in response to any Request, White & Case does not represent that "all" or "any" documents responsive to any Request will be collected or produced.

4. White & Case objects to each and every Request to the extent that it is not reasonably limited in time or otherwise not limited to a time frame relevant to the W&C Fee Application. Each such Request is overly broad, unduly burdensome, and seeks the discovery of information or documents that are not relevant to the subject matter of this proceeding and/or not proportional to the needs of this case.

5. White & Case objects to the Requests to the extent that they seek disclosure of documents or information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest or joint defense privilege, or any other protection, privilege or immunity against disclosure available under any applicable law (collectively, "**Privileged Materials**"). To the extent White & Case produces documents, White & Case will not produce any Privileged Materials. White & Case expressly reserves the right to redact non-responsive, proprietary, commercially sensitive, privileged or protected portions of any documents that may be produced in response to the Requests. Pursuant to Federal Rule of Evidence 502(d) as well as any other applicable laws, rules, regulations, court orders, or agreements, if any Privileged Material is inadvertently produced or disclosed, White & Case does not waive or intend to waive any privilege or immunity from discovery pertaining to such Privileged Material or to any other documents or information and reserves the right to demand the return of all copies of any such document(s). To the extent that there are inconsistencies in the types of privilege or other protections asserted with respect to various copies of the same document, the most comprehensive privilege or protection is intended to apply to all copies of such document.

6. White & Case objects to the Requests to the extent that they seek documents containing confidential, personal, private, proprietary, or sensitive business information; or information protected from disclosure by any law (including, but not limited to, foreign laws),

court order, or any agreement with respect to confidentiality or non-disclosure (collectively, "**Confidential Materials**"). White & Case reserves the right to redact any documents that may be produced including, but not limited to, the right to redact personally identifying information.

7. White & Case objects to each Request to the extent it expressly or impliedly assumes the existence of facts or circumstances that do not or did not exist, or states or assumes legal or factual conclusions. White & Case does not admit any factual or legal premise in these Requests. White & Case's Responses and Objections should not be construed as: (a) any admission as to the propriety of any Request; (b) an agreement as to erroneous assumptions or incorrect factual predicates contained in any Request; (c) an acknowledgment that documents or other items responsive to any Request exist; (d) a waiver of the General Objections or the objections asserted in response to specific Requests; (e) an admission as to the relevance or admissibility into evidence of any documents, items, materials, communications, or information; (f) an admission, concession, or waiver as to the validity of any claim or defense; or (g) an agreement that requests for similar documents, items, materials, communications, or information will be treated similarly.

8. White & Case objects to each Request to the extent that it seeks information that is in the possession, custody, or control of the Reorganized Debtors, publicly available, or can be obtained from another more convenient, less expensive, or less burdensome source.

9. White & Cases objects to each Request to the extent that it seeks to impose an obligation to provide information not in White & Case's possession, custody, or control, or to create documents that do not exist.

10. To the extent any term defined or used in the Requests is used in responding to the Requests, it is not accepted or conceded that any such term or definition is appropriate, descriptive

or accurate.

11. White & Case objects to each Request to the extent that it requires White & Case to search for and produce electronically stored documents from sources that are not reasonably accessible because of undue burden or cost.

12. White & Case preserves (a) all rights to object on any ground to the use of any document or information produced in response to the Requests or the subject matter thereof, in any proceeding; and (b) all rights to object on any ground to any request for further responses to the Requests or any other document request.

13. Any documents produced in response to any Request are solely for use in these chapter 11 cases and shall be governed by the terms of the *Confidentiality Agreement and Stipulated Protective Order* [Dkt. No. 174] (the "**Protective Order**").

14. The Responses and Objections represent White & Case's present knowledge, information, and belief. White & Case reserves the right to supplement, amend, correct, clarify or modify these responses and objections as additional information becomes known, including based on discovery and future developments in this action.

OBJECTIONS TO DEFINITIONS

White & Case objects to the following definitions in the Requests. The failure to object to any of the definitions shall not be deemed a waiver of any objections or a concession that any of the definitions are factually accurate.

1. White & Case objects to the Definition of "Billing Practices" as it contains improper assumptions concerning alleged billing "goals, targets, [or] expectations" and "revision or editing of time entries." White & Case further objects to the Definition of "Billing Practices" as vague and ambiguous for its use of "commentary" and "volume of hours," which are undefined.

2. White & Case objects to the Definition of "Communication" to the extent that it purports to impose burdens or obligations on White & Case that are broader than, inconsistent with, or not authorized by the Rules. White & Case further objects to this Definition on the grounds that it is overbroad, unduly burdensome, seeks to impose burden and expense that outweigh their benefits, and is not proportional to the needs of the W&C Fee Application.

3. White & Case objects to the Definition of "White & Case Personnel" as vague and ambiguous, overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application, because it purports to include "any other person . . . affiliated with White & Case." White & Case will understand "White & Case Personnel" to refer only to those employed by White & Case.

4. White & Case objects to the Definition of "Deposition Materials" as overbroad, seeking to impose burden and expense that outweigh any benefit, and not proportional to the needs of the W&C Fee Application especially in light of its purported inclusion of "any subsequent iteration, revision, or adaptation of any such document for use in a later deposition." White & Case will understand "Deposition Materials" to refer to the specific materials enumerated in the Definition without reference to "any subsequent iteration, revision, or adaptation of any such document for use in a later deposition."

5. White & Case objects to the terms or phrases defined by the Debtors to the extent that those terms and phrases are vague or ambiguous or beyond their customary meanings. White & Case has made reasonable efforts to understand the terms in the Requests as used in context, but White & Case makes its responses and objections based on its understanding of such terms and reserves the right to amend the responses and objections herein if the Reorganized Debtors assert different meanings of such terms.

OBJECTIONS TO INSTRUCTIONS

White & Case objects to the Instructions. The Requests target the production of materials from White & Case, a law firm, related to work completed by White & Case during its retention in the above-captioned cases. The burden to review and log Privileged Materials in response to such Requests is excessive and not proportional to the needs of the W&C Fee Application. To the extent White & Case withholds any information on the basis of privilege, White & Case will seek to meet and confer regarding the Instructions as they relate to a privilege log.

SPECIFIC OBJECTIONS AND RESPONSES

Subject to and without waiving the foregoing General Objections, which are hereby expressly incorporated into each of the following specific objections and responses as if fully set forth therein, White & Case responds to the Reorganized Debtors' specific Requests as follows:

REQUEST FOR PRODUCTION NO. 1

All Communications among White & Case Personnel concerning Billing Practices in connection with the Engagement, including but not limited to any communications regarding the volume of hours to be billed to the Engagement, any targets or expectations regarding fees to be generated from the Engagement, or any instructions or guidance regarding increasing or decreasing the amount of time recorded by any timekeeper on any task or matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request on the basis

that it is vague and ambiguous, including because it requests production of communications concerning "Billing Practices," a vague and ambiguous term as defined in the Requests. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as seeking information already in the Reorganized Debtors' possession and refers the Reorganized Debtors to communications by and among White & Case and Latham & Watkins, LLP concerning weekly budgets for work performed by White & Case during the Engagement.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 2

All Communications among White & Case Personnel concerning the staffing of the Engagement, including but not limited to any communications regarding the number of timekeepers to be assigned to any hearing, deposition, committee call, drafting task, or document review project, or any communications regarding whether particular timekeepers should bill time to the Engagement or to any particular task within the Engagement.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 3

All Communications among White & Case Personnel concerning the review, revision, editing, reduction, or write down of time entries recorded in connection with the Engagement, including but not limited to any communications regarding the "voluntary reductions" referenced in the Final Fee Application, any communications identifying specific entries to be reduced or written off, any communications regarding whether particular time entry descriptions should be revised before submission, and any communications regarding the criteria applied in determining which entries to reduce.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking

documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request No. 1.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 4

All Communications among White & Case Personnel concerning the $30 million demand referenced in the Objection, to the extent such communications relate to Billing Practices or the relationship between the demand and the anticipated or actual level of professional fees in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the phrase "relationship between the demand and the anticipated or actual level of professional fees" as vague and ambiguous. White & Case further objects to this Request as seeking documents or information

protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 5

All orders, opinions, rulings, or decisions issued by any bankruptcy court in any case in which White & Case LLP served as counsel, that reduced, denied, or disallowed fees or expenses sought by White & Case on the basis of overstaffing, excessive billing, duplicative services, block billing, vague or insufficient time entries, unnecessary litigation, scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate, or any other billing practice or litigation conduct that resulted in a judicial finding that fees requested by White & Case were unreasonable, unnecessary, or otherwise not compensable.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to the phrase "unnecessary litigation,

scorched earth litigation tactics, litigation tactics generally, billing for services not reasonably likely to benefit the estate, billing for services not necessary to the administration of the case, frivolous or baseless pleadings, conduct adversarial to the estate" as vague, ambiguous, and undefined. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 6

All pleading [sic] filed in any bankruptcy court in any case in which White & Case LLP served as counsel that alleged or asserted that White & Case LLP: (a) overstaffed matters; (b) excessively billed; (c) duplicated services; (d) engaged in block billing; (e) submitted vague or insufficient time entries; (f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case

further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to the phrase "(f) pursued unnecessary litigation; (g) employed "scorched earth" litigation tactics or other improper litigation tactics; (h) billed for services not reasonably likely to benefit the estate; (i) billed for services not necessary to the administration of the case; (j) filed frivolous or baseless pleadings; or (k) engaged in conduct adverse to the estate" as vague, ambiguous, and undefined. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 7

All pleadings filed in any bankruptcy court in any case in which White & Case LLP served as counsel in which any party requested, sought, or argued for the reduction, denial, modification, or disallowance of any attorney's fees or costs requested by White & Case LLP, regardless of whether such request or objection was sustained, overruled, or otherwise resolved.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White &

Case further objects on the basis that the Request, which expressly relates to other cases, is on its face not relevant to the W&C Fee Application or the objection in this proceeding. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All" documents from "any case" without limitation. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request as overly burdensome and harassing because it seeks documents that, if they exist, are publicly available.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 8

All Communications among White & Case Personnel referencing the Consenting Creditors' Statement filed at Docket No. 589, to the extent such communications relate to Billing Practices, staffing decisions, or the volume of fees being generated in the Engagement. This Request does not seek communications reflecting legal strategy or mental impressions regarding the substantive response to the Statement, but solely communications regarding whether and how the Statement should affect billing or staffing decisions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 9

All Communications among White & Case Personnel concerning the preparation, drafting, or review of the Final Fee Application, including but not limited to any communications regarding the assignment or reassignment of time entries to project codes or billing categories, any communications regarding the allocation of time entries across multiple project categories, any communications regarding the "overlap" between project categories that White & Case acknowledges in the Final Fee Application, any communications regarding which project code a particular time entry should be billed to or categorized under, any communications regarding the narrative descriptions included in the Final Fee Application, and any communications regarding how the work performed by White & Case Personnel should be presented, described, or organized in the Final Fee Application.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and

not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "assignment or reassignment of time entries." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request Nos. 1 and 3.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 10

All deposition outlines prepared, drafted, revised, or used by any White & Case Personnel in connection with any deposition taken during the Engagement. White & Case may redact portions of any deposition outline reflecting attorney strategy, confidential client information, or other protected work product to address any privilege concerns.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case objects to this Request to the extent it seeks documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege,

immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 11

All documents sufficient to show any internal budget, fee estimate, fee projection, or anticipated fee range prepared, drafted, or considered by White & Case LLP in connection with the Engagement, regardless of whether such budget, estimate, projection, or range was finalized, approved, or filed.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to show" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "anticipated fee range." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits

for the contested matter at issue. White & Case further objects to this Request as seeking information already in the Reorganized Debtors' possession and refers the Reorganized Debtors to, among other things, communications by and among White & Case and Latham & Watkins, LLP concerning weekly budgets for work performed by White & Case during the Engagement. White & Case further objects to this Request to the extent it is duplicative of Request No. 1.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 12

All Communications among White & Case Personnel concerning whether a budget, fee estimate, fee projection, or anticipated fee range should be prepared or filed in connection with the Engagement, including any Communications discussing reasons for preparing, not preparing, filing, or not filing such a budget or estimate.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "anticipated fee range." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection.

White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue. White & Case further objects to this Request to the extent it is duplicative of Request Nos. 1 and 11.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 13

All Communications among White & Case Personnel concerning whether the professional fees incurred or anticipated to be incurred in connection with the Engagement were excessive, unusually high, disproportionate to the matters at issue, likely to draw objection, or otherwise at risk of reduction or disallowance by the Court.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested

matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 14

All Communications among White & Case Personnel concerning the entry of time after the work was performed, including any Communications concerning delayed time entry, reconstruction of time entries, or instructions to enter time for prior dates.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All Communications" without limitation. White & Case further objects to the Request as vague and ambiguous, including the phrase "delayed time entry, reconstruction of time entries." White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case

will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 15

All documents sufficient to show the date and time each time entry billed to the Engagement was created, entered into White & Case LLP's billing system, modified, or submitted for billing, including any audit logs, metadata, or system reports reflecting the creation, modification, and history of such entries.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to show" without limitation. White & Case further objects to this Request as seeking documents or information protected by the attorney-client privilege, the attorney work product doctrine, and/or any other applicable privilege, immunity, or protection. White & Case further objects to this Request as not relevant and because the burden and expense of searching for responsive non-privileged communications, if any exist, outweigh any benefits for the contested matter at issue.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

REQUEST FOR PRODUCTION NO. 16

All documents sufficient to identify the billing or timekeeping system used by White & Case LLP in connection with the Engagement[.]

RESPONSE TO REQUEST FOR PRODUCTION NO. 16

White & Case incorporates its General Objections as though fully set forth herein. White & Case objects to this Request on the grounds that it is overly broad, unduly burdensome, not proportional to the needs of the case, and harassing because, among other things, it seeks information that is not relevant or necessary to the resolution of the W&C Fee Application or the objection thereto, which can be resolved based on the record already before the Court. White & Case further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs of the case, because, among other things, it seeks "All documents sufficient to identify" without limitation.

Subject to a meet and confer between the parties and absent an order from the Court regarding the need for, or appropriate scope of, discovery in this contested matter, White & Case will not produce documents responsive to this request at this time.

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Dated: April 2, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

United States Bankruptcy Court
Southern District of Texas
ENTERED
April 27, 2026
Nathan Ochsner, Clerk

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

IN RE:	§	
MODIVCARE INC., et al.,	§	**CASE NO. 25-90309 (ARP)**
DEBTOR.	§	**CHAPTER 11**
	§	**(Jointly Administered)**

STIPULATION AND AGREED ORDER

This Stipulation and Agreed Order (the "**Stipulation**") is entered into by and between ModivCare Topco, LLC, as reorganized debtor (the "**Reorganized Debtor**"), and Cresa, LLC ("**Cresa**," and together with the Reorganized Debtor, the "**Parties**" and each a "**Party**") to resolve the *Motion of Cresa, LLC to Enforce the Final Fee Order, Compel Payment of Court-Approved Fees, and for Related Relief* [Dkt. 1412] (the "**Motion**"). By way of background, on March 4, 2026, the Court entered the *Final Order Allowing Compensation and Reimbursement of Expenses of Cresa, LLC* [Dkt. 1348] (the "**Final Fee Order**"), allowing Cresa compensation and reimbursement of expenses in the amount of $1,950,000.00 on a final basis. On April 3, 2026, Cresa filed the Motion seeking, among other things, enforcement of the Final Fee Order and immediate payment of the allowed amount. To avoid the costs, delay, and uncertainty of further litigation, and in exchange for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties hereby stipulate and agree, and the Court hereby approves, the terms set forth below as a final and complete resolution of the Motion and the matters addressed herein:

1. **Payment of Allowed Fees.** On or before May 8, 2026, the Reorganized Debtor shall pay to Cresa the full amount of $1,950,000.00 allowed by the Final Fee Order (the "**Allowed Fees**"), by wire transfer of immediately available funds in

accordance with wire instructions provided by Cresa. Payment of the Allowed Fees shall constitute full and final satisfaction of the Reorganized Debtor's obligations under the Final Fee Order.

2. **Mutual Release of Contractual Obligations.** Upon receipt by Cresa of the Allowed Fees in accordance with Paragraph 1 above, each Party, on behalf of itself and its predecessors, successors, assigns, parents, subsidiaries, affiliates, officers, directors, employees, members, managers, partners, agents, and representatives, hereby fully, finally, and forever releases, acquits, and discharges the other Party, together with its predecessors, successors, assigns, parents, subsidiaries, affiliates, officers, directors, employees, members, managers, partners, agents, and representatives, from any and all prior and current contractual obligations of any kind, whether known or unknown, accrued or unaccrued, liquidated or unliquidated, including, without limitation, any and all obligations arising under or relating to the Vendor Service Agreement approved by the *Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors-in-Possession* [Dkt. 716] (the "**Services Agreement**"). For the avoidance of doubt, effective upon receipt of the Allowed Fees, the Services Agreement shall be deemed terminated in its entirety, and neither Party shall have any further rights, duties, liabilities, or obligations thereunder, including any obligation of the Reorganized Debtor to pay interest, late fees, attorneys' fees, or any other amounts of any kind, whether arising before or after the date of this Stipulation, including any amounts that may be due now or in the future related all activities and properties that Reorganized Debtor has been shown by them related

to looking for a new space for the Reorganized Debtor's headquarters in Denver, CO.

3. **Resolution of the Motion.** Upon timely receipt of the Allowed Fees in accordance with Paragraph 1 above, the Motion shall be deemed fully and finally resolved and withdrawn, with prejudice. Cresa waives any and all claims for interest, attorneys' fees, expenses, costs, sanctions, or other relief sought in or relating to the Motion. In the event the Reorganized Debtor fails to pay the Allowed Fees in full on or before May 8, 2026, the releases and waivers set forth in Paragraphs 2 and 3 hereof shall be null and void, and Cresa shall be awarded all relief previously requested in the Motion.

4. **Non-Disparagement:** The Parties agree that neither Party, nor any of their respective officers, directors, employees, agents, or affiliates acting on their behalf, shall make, publish, or communicate to any person or entity, or in any public forum (including social media, online reviews, press, or other media), any statement — whether written, oral, or electronic — that disparages, defames, or is reasonably likely to harm the reputation, business, or goodwill of the other Party or its officers, directors, employees, products, services, or business practices; *provided* that the Parties may take any action reasonably necessary to enforce its rights due to a failure of the other to perform under this Stipulation pursuant to Paragraph 3 hereof.

5. **Authority; No Admission; Entire Agreement.** Each Party represents and warrants that the person executing this Stipulation on its behalf has full authority to do so and to bind such Party to the terms hereof. This Stipulation is the product of negotiation and compromise; nothing herein shall be construed as an admission of liability or wrongdoing by either Party. This Stipulation may be executed in

counterparts, including by electronic signature, each of which shall be deemed an original and all of which together shall constitute one and the same instrument. This Stipulation constitutes the entire agreement of the Parties with respect to the subject matter hereof and supersedes any prior agreements or understandings, whether oral or written, between the Parties with respect thereto.

6. **Retention of Jurisdiction.** The Court shall retain exclusive jurisdiction to hear and determine any and all disputes arising from or relating to the interpretation, implementation, or enforcement of this Stipulation.

Signed: April 27, 2026

Alfredo R Pérez
United States Bankruptcy Judge

APPROVED AS TO FORM AND CONTENT:

By: */s/ Johnie Patterson*
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COUNSEL FOR CRESA, LLC

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

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

WHITE & CASE LLP'S OBJECTION TO MODIVCARE TOPCO, LLC'S EMERGENCY MOTION FOR RECONSIDERATION OF (I) ORDER BIFURCATING LEGAL AND FACTUAL ISSUES AND (II) ORDER REQUIRING DEPOSIT OF FUNDS INTO COURT REGISTRY

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases, respectfully submits this objection ("Objection")[2] to *Modivcare Topco, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Dkt. No. 1427] (the "Motion to Reconsider") filed by ModivCare TopCo, LLC ("TopCo").

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not defined in this Objection have the meanings ascribed to them in *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Dkt. No. 1290] (the "W&C Fee Application") or the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Dkt. No. 1288] (the "AlixPartners Fee Application" and, together with the W&C Fee Application, the ("Fee Applications")), as applicable.

PRELIMINARY STATEMENT

1. At the April 6 status conference, the Court ruled that it would first consider TopCo's objection to the Fee Applications based on governing law and the extensive evidentiary record from these chapter 11 cases. That makes abundant sense, as the Court reviewed every document the Committee filed, weighed every piece of evidence the Committee introduced, and considered every argument the Committee made throughout these chapter 11 cases. It can now review time entries that the Committee's professionals submitted with their Fee Applications, describing their work in six-minute increments. That is more than sufficient for the Court to adjudicate this dispute. But if TopCo disagrees, the Court has given TopCo the opportunity to make that argument, and if the Court accepts TopCo's position, the dispute can then be resolved in phase 2.

2. The Court also ordered that the parties responsible for paying estate professional fees need to place unpaid and disputed amounts in the Court's registry. The Court's ruling does not impose new obligations, as the Reorganized Debtors were already required by the Confirmation Order to hold estimated estate professional fees in escrow. This Court is only requiring the Reorganized Debtors to pay into the Court funds that should already be in escrow.

3. The Court's ruling on both issues was well within the Court's broad discretion to manage and govern these proceedings. TopCo's request to reconsider fails to identify any legal basis to justify reconsideration. TopCo points to no manifest error of law or fact, no new evidence and no intervening change in controlling law. Instead, TopCo simply rehashes arguments that the Court has already rejected. Both motions to reconsider should be denied.

ARGUMENT

I. Bifurcation Is a Sound Exercise of the Court's Discretion

4. The Court determined that it will first consider the Fee Applications and objections based on the law and the existing record, with a second phase of new evidence to follow if

necessary. TopCo asks the Court to reconsider that decision, arguing that it cannot sever consideration of any aspect of the Fee Applications from the accusation of extortion. Mot. to Reconsider ¶¶ 15-35. That is not a proper basis for reconsideration.[3] TopCo simply rehashes a position that the Court previously rejected when ordering bifurcation. *Templet v. HydroChem Inc.*, 367 F.3d 473, 479 (5th Cir. 2004) (noting that a motion for reconsideration "is not the proper vehicle for rehashing evidence, legal theories, or arguments" but instead "serve[s] the narrow purpose of allowing a party to correct manifest errors of law or fact or to present newly discovered evidence.") (alteration in original) (internal quotations and citations omitted); *Grevious v. Flagstar Bank, FSB*, No. H-11-246, 2012 WL 1900564, at *3 (S.D. Tex. May 24, 2012) (denying a motion for reconsideration because the plaintiff "failed to present any new evidence for the court's consideration or to establish a manifest error of law" and noting that "personal dissatisfaction with the court's ruling" is insufficient to warrant relief).

5. In addition to being an insufficient basis for reconsideration, TopCo's argument is also wrong. The Court can determine whether the Committee prosecuted frivolous arguments, notwithstanding any supposed threat about billing. The Court has already made findings that may dispose of this issue. TopCo seeks to avoid the implications of the existing record and the Court's prior rulings by pointing to a purported statement made in a settlement meeting. This effort should fail. As part of phase 1, TopCo can present whatever arguments it wants as to why the case should

[3] TopCo alleges that "[a] motion to reconsider is also warranted where the court's order rests on an 'erroneous legal standard.'" Mot. to Reconsider ¶ 2 (quoting *Simon v. United States*, 891 F.2d 1154, 1159 (5th Cir. 1990)). This quote is not found in *Simon*. *See Simon*, 891 F.2d at 1159 (affirming the denial of the request to alter or amend the judgment and explaining that, to prevail, the movant "must clearly establish either a manifest error of law or fact or must present newly discovered evidence"). Consistent with the standard actually articulated in *Simon*, a motion to alter or amend a judgment must (i) "clearly establish either a manifest error of law or fact," (ii) "present newly discovered evidence," or (iii) show that "there has been an intervening change in the controlling law." *Schiller v. Physicians Res. Grp. Inc.*, 342 F.3d 563, 567 (5th Cir. 2003). "A motion to reconsider a judgment is treated as a Rule 59(e) motion to alter or amend that judgment." *Livingston Downs Racing Ass'n, Inc. v. Jefferson Downs Corp.*, 259 F. Supp. 2d 471, 474 (M.D. La. 2002).

proceed to phase 2. But these arguments do not provide a reason for the Court to reconsider its bifurcation ruling.

6. TopCo also characterizes a relative comparison of the Debtors' and the Committee's professional fees as a "fact-intensive" inquiry requiring an evidentiary hearing. *See* Mot. to Reconsider ¶ 28. Not so. The Court can consider the reasonableness of the Committee's fees in relation to other estate professionals in these chapter 11 cases, as well as estate professionals in cases of similar duration and with similar disputes. TopCo cites no authority compelling a single-phase evidentiary hearing in this dispute. *See id.* ¶¶ 17-19 (citing *In re First Colonial Corp. of Am.*, 544 F.2d 1291 (5th Cir. 1977) (superseded by § 330); *In re U.S. Golf Corp.*, 639 F.2d 1197, 1202 (5th Cir. 1981) (same); *Sylvester v. Chaffe McCall, L.L.P.*, 23 F.4th 543, 549 (5th Cir. 2022) (addressing whether counsel for a chapter 7 trustee was performing its duties under § 704 or § 330); *Baker Botts L.L.P. v. ASARCO LLC*, 576 U.S. 121, 126 (2015) (considering whether counsel could be compensated for defending fee applications)). Even *In re Assadi* rejected the need for an evidentiary hearing where the objecting party, like TopCo, merely argued that "each time entry contained insufficient detail and that daily tasks should not have been grouped into a single billing." 2025 WL 1576801, *2 (5th Cir. June 4, 2025).

7. And again, TopCo is free to make its arguments during phase 1.

II. TopCo Has No Basis to Challenge the Escrow Order, and Its Protest Suggests Existing Violations of Court Orders

8. Like with the bifurcation order, TopCo does not come close to meeting the standard necessary for reconsideration of the escrow order. It does not even try to allege a manifest error of law or fact, an intervening change in controlling law, or point to any newly discovered evidence. *See Schiller*, 342 F.3d at 567.

9. TopCo's filing of the Motion to Reconsider and certain of the statements included in the motion also raise significant concerns as to whether the Reorganized Debtors have violated the Confirmation Order. The Plan requires the Reorganized Debtors to escrow the Committee's professional fees "[a]s soon as reasonably practicable after the Confirmation Date and no later than the Effective Date." Plan § 2.5(a). Escrowed funds "***shall not be and shall not be deemed property of the Debtors, their Estates, or the Reorganized Debtors***," but instead "shall be held in trust for the Professionals." *Id.* (emphasis added). If the escrow is insufficient to satisfy allowed professional claims, the Reorganized Debtors must fund any shortfall in cash within five business days of receiving notice of such shortfall. *Id.* § 2.5(b). This provision of the Plan and Confirmation Order—nearly ubiquitous in complex chapter 11 plans and confirmation orders—ensures that the Debtors can satisfy all administrative claims on or promptly after the effective date, as required by section 1129(a)(9) of the Bankruptcy Code. *See* 11 U.S.C. § 1129(a)(9); Plan § 2.5(a); Confirmation Order § C (stating that the Plan satisfies the requirements of section 1129(a) of the Bankruptcy Code); § 3 (incorporating the terms of the Plan). Without this provision, the Plan would not have been confirmable, and the Debtors would not have emerged from bankruptcy under their new ownership.

10. TopCo now argues that professional fees required to be escrowed are the Reorganized Debtors' personal property, and that the Court's escrow order operates as an "injunction" requiring them to be paid to the Committee professionals before their fees are allowed. *See* Mot. to Reconsider ¶¶ 6, 37, 47 (falsely asserting that "TopCo has a concrete property interest in the approximately $1.644 million in disputed funds" and that "[t]hose funds belong to TopCo under the confirmed Plan of Reorganization until a court orders their payment following allowance of the underlying claims"). This Court's April 6, 2026 ruling only required the

Reorganized Debtors to transfer funds that should already be in escrow to the Court's registry. *See* Hr'g Tr. (Apr. 6, 2026) at 6:2-9.

11. If the Reorganized Debtors failed to place these amounts in escrow—as TopCo suggests in the Motion to Reconsider—they are actively violating the Confirmation Order. If the Reorganized Debtors have placed sufficient funds in escrow, then the only apparent basis for TopCo's opposition is a belief that they can prevent the escrow agent from disbursing the fees should this Court grant the Fee Applications. The escrow order merely requires the Reorganized Debtors to place funds that are not their property in the Court's control pending resolution of this dispute. The Motion to Reconsider, and TopCo's vigorous refusal to simply transfer funds that should already be in escrow and that are not TopCo's property in any event, raises significant concerns and warrants a full accounting of the professional fee escrow.

CONCLUSION

12. White & Case respectfully requests that the Court deny the Motion to Reconsider. To the extent a full accounting of the professional fee escrow reveals that the Reorganized Debtors have violated the Confirmation Order, White & Case respectfully requests that the Court fashion an appropriate remedy.

[*Remainder of Page Intentionally Left Blank*]

April 28, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on April 28, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

United States Bankruptcy Court
Southern District of Texas
ENTERED
April 30, 2026
Nathan Ochsner, Clerk

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

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

ORDER REQUIRING THE REORGANIZED DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the "W&C Application"), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the "AlixPartners Application" and, together with the W&C Application, the "Applications"); and in accordance with the Court's rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court Registry"), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

in the Applications, including $628,727.58 in connection with the W&C Application and $1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. This is a final order.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: April 30, 2026

Alfredo R Pérez
United States Bankruptcy Judge

#1503

25-90309

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the record.

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

IN RE:	§	
	§	**CASE NO. 25-90309**
MODIVCARE, INC.	§	
	§	
DEBTOR	§	

NOTICE OF APPEAL
(Ref. ECF No. 1502)

COMES NOW, ModivCare Topco, LLC (**"ModivCare**") and files this Notice of Appeal as follows:

1. Appellant is ModivCare Topco, LLC, the Reorganized Debtor in the above referenced bankruptcy case.

2. The subject of the appeal is the bankruptcy court's *Order Requiring the Reorganized Debtors To Deposit Funds In Escrow With The Court* (ECF No. 1502) (**"Deposit Order"**).

3. A copy of the Deposit Order, dated April 30, 2026, is attached as Exhibit A.

4. This Notice of Appeal is being filed within 14 days after the entry of the Fee Order and is a timely notice of appeal.

5. The other parties to this appeal are:

a. *White & Case LLP*
Charles Koster
Suite 2900
609 Main St.
Houston, TX 77002

b. *AlixPartners, LLP*
David MacGreevey
909 Third Avenue, 28th Floor
New York, NY 10022

Dated: May 1, 2026.

Respectfully submitted,

By: */s/ Johnie Patterson*
Johnie Patterson
attorney-in-charge
SBN 15601700
COUNSEL FOR MODIVCARE
TOPCO, LLC

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and complete copy of the foregoing Notice of Appeal was served via electronic transmission on May 1, 2026 on all parties receiving notices from the Court's CM/ECF servicing platform, as well as Charles Koster and David MacGreevey.

/s/Johnie Patterson
Johnie Patterson

United States Bankruptcy Court
Southern District of Texas
ENTERED
April 30, 2026
Nathan Ochsner, Clerk

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

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

ORDER REQUIRING THE REORGANIZED DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the "W&C Application"), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the "AlixPartners Application" and, together with the W&C Application, the "Applications"); and in accordance with the Court's rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court Registry"), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

in the Applications, including $628,727.58 in connection with the W&C Application and $1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. This is a final order.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: April 30, 2026

Alfredo R Pérez
United States Bankruptcy Judge

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

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

NOTICE OF FILING
PROPOSED SCHEDULING AND BIFURCATION ORDER

PLEASE TAKE NOTICE THAT on April 6, 2026, the U.S. Bankruptcy Court for the Southern District of Texas (the "Court") held a status conference in the above-captioned chapter 11 cases (the "Status Conference") regarding *hite & Case LLP s Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by hite & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); and *hite & Case LLP s Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the*

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Period From September 9, 2025 Through December 29, 2025 [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies").

PLEASE TAKE FURTHER NOTICE THAT on the record at the Status Conference, the Court directed White & Case, LLP ("White & Case"), AlixPartners, LLP ("AlixPartners"), and ModivCare TopCo, LLC ("TopCo") to submit a proposed order (the "Original Proposed Bifurcation Order") governing the bifurcation and scheduling of the disputed issues regarding the Fee Applications, Fee Objections, and Replies.

PLEASE TAKE FURTHER NOTICE THAT on April 9, 2026, TopCo filed *Modivcare Topco, LLC s Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Re uiring Deposit of Funds into Court Registry* [Docket No. 1427] (the "Motion for Reconsideration") requesting the Court to reconsider its rulings at the Status Conference.

PLEASE TAKE FURTHER NOTICE THAT on April 28, 2026, White & Case filed *hite & Case LLP s Objection to ModivCare TopCo, LLC s Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Re uiring Deposit of Funds into Court Registry* [Docket No. 1466] (the "Objection to Motion for Reconsideration").

PLEASE TAKE FURTHER NOTICE THAT on April 30, 2026, the Court held a hearing in the above-captioned chapter 11 cases (the "Hearing") regarding the Motion for Reconsideration and Objection to Motion for Reconsideration and directed White & Case to submit a revised proposed order (the "Revised Proposed Bifurcation Order").

PLEASE TAKE FURTHER NOTICE THAT the parties met and conferred regarding the Revised Proposed Bifurcation Order, but were unable to agree on a form of order.

PLEASE TAKE FURTHER NOTICE THAT a Revised Proposed Bifurcation Order acceptable to White & Case and AlixPartners is attached hereto for the Court's consideration. For the Court's convenience, a redline comparison of the Revised Proposed Bifurcation Order against the Original Proposed Bifurcation Order is attached hereto as **Exhibit A**.

[*Remainder of Page Intentionally Left Blank*]

May 5, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on May 5, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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

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

SCHEDULING AND BIFURCATION ORDER

In connection with consideration of *hite & Case LLP s Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by hite & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); *hite & Case LLP s Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies"); *Motion to Compel hite & Case LLP to Respond to Discovery Re uests* [Docket No.

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

1409]; *Modivcare Topco, LLC s Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Re uiring Deposit of Funds into Court Registry* [Docket No. 1427]; *hite & Case LLP s Objection to ModivCare TopCo, LLC s Motion to Compel* [Docket No. 1458]; *hite & Case LLP s Objection to ModivCare TopCo, LLC s Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Re uiring Deposit of Funds into Court Registry* [Docket No. 1466]; and in accordance with the United States Bankruptcy Court for the Southern District of Texas (the "Court") rulings on the record at the hearing held on April 30, 2026, it is hereby ORDERED that:

1. The Court will adjudicate the reasonableness of White & Case LLP's ("White & Case") and AlixPartners LLP's ("AlixPartners") fees under section 330 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") first based on the evidentiary record already established in the chapter 11 cases, the Fee Applications, the Fee Objections, and the Replies ("Phase 1"). The issues adjudicated during Phase 1 shall include, but not be limited to whether:

   i. this Court may or should amend its October 31, 2025 orders authorizing the retention of (a) White & Case as bankruptcy counsel to the official committee of unsecured creditors (the "Committee") effective as of September 9, 2025 and approving White & Case's billing rates for this representation [Docket No. 616] and (b) AlixPartners as financial advisor to the Committee effective as of September 10, 2025 and approving the compensation terms set forth in the applicable engagement letter [Docket No. 644];

   ii. TopCo may object to the reasonableness of any time entry or expense item not specifically identified in the Fee Objections;

   iii. there is a basis to establish a different standard under which to assess the reasonableness of the Debtors' professionals' fees which this Court has approved without objection and the Committee's professionals' fees sought in the Fee Applications;

   iv. under the applicable standard and without any additional discovery, the Court can determine the reasonableness of the fees being sought; and

2. The parties shall submit any additional briefing for the Phase 1 issues on or before June 3, 2026. Any response briefs shall be due on or before June 8, 2026.

3. In Phase 1 the Court will not consider any additional evidence beyond the Fee Applications, the Fee Objections, the Replies, and matters as to which this Court may take judicial notice. The hearing on Phase 1 will be on June 9, 2026, at 10:00 a.m.

4. If the Court determines that it cannot fully resolve the Objection and the Fee Applications in Phase 1, the Court will consider additional evidence related to the Fee Objections that are not resolved in Phase 1 ("Phase 2"). All Parties reserve the right to seek any appropriate discovery in Phase 2 related to any issues not adjudicated in Phase 1. A hearing on Phase 2 will, if necessary, be set by further order of the Court.

5. All discovery related to the Fee Applications shall be stayed pending resolution of Phase 1 or other order of the Court.

6. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

7. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated _____, 2026
Houston, Texas

_____
Alfredo R. Pérez
United States Bankruptcy Judge

Exhibit A

Redline

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

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

SCHEDULING AND BIFURCATION ORDER

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); *White & Case LLP's Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies"); *Motion to Compel White & Case LLP to Respond to*

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Discovery Requests [Docket No. 1409] ~~(the "Motion to Compel")~~; *Modivcare Topco, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1427]; *White & Case LLP's Objection to ModivCare TopCo, LLC's Motion to Compel* [Docket No. 1458]; *White & Case LLP's Objection to ModivCare TopCo, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1466]; and in accordance with the United States Bankruptcy Court for the Southern District of Texas (the "Court") rulings on the record at the ~~status conference~~hearing held on April ~~6~~30, 2026, it is hereby ORDERED that:

1. The Court will adjudicate the reasonableness of White & Case LLP's ("White & Case") and AlixPartners LLP's ("AlixPartners") fees under section 330 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") first based on the evidentiary record already established in the chapter 11 cases, the Fee Applications, the Fee Objections, and the Replies ("Phase 1"). The issues adjudicated during Phase 1 shall include, but not be limited to whether:

~~i. ModivCare TopCo, LLC ("TopCo") has standing to object to the Fee Applications;~~

i. ~~ii.~~ this Court may or should amend its October 31, 2025 orders authorizing the retention of (a) White & Case as bankruptcy counsel to the official committee of unsecured creditors (the "Committee") effective as of September 9, 2025 and approving White & Case's billing rates for this representation [Docket No. 616] and (b) AlixPartners as financial advisor to the Committee effective as of September 10, 2025 and approving the compensation terms set forth in the applicable engagement letter [Docket No. 644];

ii. ~~iii.~~ TopCo may object to the reasonableness of any time entry or expense item not specifically identified in the Fee Objections;

~~iv. the Court should consider, in connection with the Fee Applications, any documents or testimony concerning any offers, statements, or other communications made in the~~

~~context of settlement discussions involving the Committee, including those alleged in the Fee Objections;~~

iii. ~~v.~~ there is a basis to establish a different standard under which to assess the reasonableness of the Debtors' professionals' fees which this Court has approved without objection and the Committee's professionals' fees sought in the Fee Applications;

iv. ~~vi.~~ under the applicable standard and without any additional discovery, the Court can determine the reasonableness of the fees being sought; and

~~vii. under the applicable standard and without any additional discovery, the Court should grant the Fee Applications.~~

2. The parties shall submit any additional briefing for the Phase 1 issues on or before June 3, 2026. Any response briefs shall be due on or before June 8, 2026.

3. ~~2.~~ In Phase 1 the Court will not consider any additional evidence beyond the Fee Applications, the Fee Objections, the Replies, and matters as to which this Court may take judicial notice. The hearing on Phase 1 will be on ~~_____~~June 9, 2026, at 10:00 a.m.

4. ~~3.~~ If the Court determines that it cannot fully resolve the Objection and the Fee Applications in Phase 1, the Court will consider additional evidence related to the Fee Objections that are not resolved in Phase 1 ("Phase 2"). All Parties reserve the right to seek any appropriate discovery in Phase 2 related to any issues not adjudicated in Phase 1. A hearing on Phase 2 will, if necessary, be set by further order of the Court.

5. ~~4. White & Case shall submit responses to the Motion to Compel by April 24, 2026. Other than litigation of the Motion to Compel, all~~All discovery related to the Fee Applications shall be stayed pending resolution of Phase 1 or other order of the Court.

6. ~~5.~~ The terms and conditions of this Order are immediately effective and enforceable upon its entry.

7. ~~6.~~ This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated _____, 2026
Houston, Texas

_____
Alfredo R. Pérez
United States Bankruptcy Judge

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

In re:	§	
	§	
	§	Chapter 11
MODIVCARE, INC.	§	
	§	
	§	Case No. 25-90309
Debtors.	§	
	§	Jointly Administered
	§	

MODIVCARE TOPCO, LLC'S EMERGENCY MOTION FOR STAY PENDING APPEAL

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW ModivCare Topco, LLC (**"ModivCare"**), and hereby files this *Emergency Motion for Stay Pending Appeal* (the "**Motion**"), and in support hereof, respectfully states as follows:

RELEVANT BACKGROUND FACTS

1. On February 11, 2026, AlixPartners, LLP filed its Final Fee Application for Allowance and Compensation for Professional Services Rendered and Reimbursement of Expenses (the **"AlixPartners Fee Application"**)

2. On February 12, 2026, White & Case, LLP (**"W&C"**) filed its Final Application for Allowance of Compensation and Reimbursement of Expenses (the **"W&C Fee Application"**).

3. On March 4, 2026, ModivCare filed its objection to the AlixPartners Fee Application (the **"AP Objection"**).

4. On March 5, 2026, ModivCare filed its objection to the W&C Fee Application (the **"W&C Objection"**).

5. The AlixPartners Fee Application and the W&C Fee Application are collectively referred to as **"The Fee Applications"**.

6. The W&C Objection and the AP Objection are collectively referred to as **"The Objections"**.

7. On April 6, 2026, the Court held a status conference related to The Objections (the **"Status Conference"**), during which it *sua sponte* indicated its intent to require ModivCare to deposit all disputed and unpaid amounts into the registry of the Court. The initial *sua sponte* order was made orally from the bench.

8. Although no written order was entered at that time, on April 9, 2026, ModivCare, out of an abundance of caution, filed an *Emergency Motion to Reconsider*, requesting that the Court reconsider its stated intention to require a registry deposit (the **"Motion to Reconsider"**) [ECF No. 1427].

9. On May 30, 2026, the Court held a continued Status Conference and hearing on the *Motion to Reconsider* (the **"Hearing"**).

10. At the outset of the Hearing, the Court stated that the *Motion to Reconsider* was premature because no order requiring a registry deposit had been entered. However, on May 30, 2026, following the conclusion of the Hearing, the Court entered an *Order Requiring the Reorganized Debtors to Deposit Funds in Escrow* with the Court (the **"Escrow Order"**) [ECF No.1502].

11. The Escrow Order required:

a. ModivCare to deposit $628,727.58 in connection with the W&C Fee Application and $1,016,169.40 in connection with the AlixPartners Fee Application into the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the **"Registry Deposit"**);

b. ModivCare to make the Registry Deposit on or before April 14, 2026; and

c. The Registry Deposit to remain in the Court registry pending resolution of the Objections.

12. The Escrow Order further provided that W&C and AlixPartners were not precluded from seeking additional compensation from ModivCare, including reimbursement of fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

13. The Escrow Order was entered as a final order, and on May 1, 2026, ModivCare filed its Notice of Appeal.

14. As reflected in the docket and the *sua sponte* entry of the Escrow Order: (a) no party filed a motion requesting that funds be deposited into the Court's registry; (b) no party filed a motion seeking additional compensation; (c) no hearing was held prior to entry of the Escrow Order; (d)

no evidence was presented prior to entry of the Escrow Order; and (e) the Escrow Order cites no provision of the Bankruptcy Code, rule, or case law as authority for its entry.

BASIS FOR RELIEF REQUESTED

A. LEGAL STANDARD FOR GRANTING A MOTION FOR STAY PENDING APPEAL

15. The Fifth Circuit employs a four-part test in determining whether to grant a stay pending appeal[1]: (i) whether the movant has made a showing of likelihood of success on the merits; (ii) whether the movant has made a showing of irreparable injury if the stay is not granted; (iii) whether the granting of the stay would substantially harm the other parties; and (iv) whether the granting of the stay would serve the public interest. *Ruiz v. Estelle*, 666 F.2d 854, 856 (5th Cir. 1982)(The party who seeks a stay bears the burden to establishing the prerequisites, however the movant need not always show a "probability' of success on the merits; instead, the movant need only present a substantial case on the merits when a serious legal question is involved and show that the balance of the equities weighs heavily in favor of granting the stay.)(citations omitted); *accord Arnold v. Garlock, Inc.*, 278 F.3d 426, 438-39 (5th Cir. 2001). The Fifth Circuit, however, "has refused to apply these factors in a rigid mechanical fashion." *Reading & Bates Petroleum Co. v. Musslewhite*, 14 F.3d 271, 272 (5th Cir. 1994).

16. Accordingly, some courts within the Fifth Circuit have determined that "the absence of any one factor is not fatal to a successful motion for stay." *In re Permian Producers Drilling, Inc.*, 263 B.R. 510, 515 (W.D. Tex. 2000) (citing *In re First S. Savs. Ass'n*, 820 F.2d 700, 709 n.10 (5th Cir. 1987). ModivCare respectfully submits that a stay of the Court's Escrow Order is necessary and appropriate pending appellate review.

[1] The elements to be considered for a stay pending appeal outlined by the Fifth Circuit have since been confirmed by the Supreme Court in *Nken v. Holder*, 556 U.S. 418, 434 (2009).

B. FIRST ELEMENT – LIKELIHOOD OF SUCCESS ON THE MERITS

Injunctions Require an Adversary Proceeding

17. ModivCare is likely to succeed on multiple independent grounds. First, the Escrow Order compels affirmative action and is therefore a mandatory injunction. The distinction between prohibitory and mandatory injunctions is dispositive. A prohibitory injunction restrains a party from acting and preserves the *status quo*. A mandatory injunction compels affirmative action, altering the existing state of affairs. *Savage Tavern v. Stag,* 589 F. Supp. 3d 624, 639 (N.D. Tex. 2022) (Mandatory injunction "mandates" a party to take some action inconsistent with the *status quo* rather than prohibiting them from altering the *status quo*.).

18. The Escrow Order compels ModivCare to affirmatively transfer approximately $1.6 million into the Court's registry before a single dollar of fees has been judicially allowed under 11 U.S.C. § 330, notwithstanding pending objections. In doing so, the Escrow Order effectively presupposes entitlement to disputed funds.

19. Injunctive relief must be brought by an adversary proceeding. FED. R. BANKR. P. 7001(7); See also *Feld v. Zale Corporation (In re Zale Corporation)*, 62 F.3d 746, 763-66 (5th Cir. 1995) (Court's injunction issued without the protections of an adversary proceeding was improper.)

20. Furthermore, a party seeking a mandatory injunction bears a heightened burden, requiring a "clear entitlement" to relief under the facts and the law. *Justin Industries, Inc. v. Choctaw Securities, L.P.,* 920 F.2d 262, 268 n.7 (5th Cir. 1990). Such relief should not be granted except in rare instances in which the facts and law are clearly in favor of the moving party. *Exhibitors Poster Exch., Inc. v. Nat'l Screen Serv. Corp.*, 441 F.2d 560, 561-62 (5th Cir. 1971)(citations omitted).

21. The Supreme Court has further underscored that injunctive relief is "an extraordinary and drastic remedy" that is "never awarded as of right." *Winter v. Natural Resources Defense Council, Inc.,* 555 U.S. 7, 24 (2008). *Winter* requires a clear showing on all four elements before an injunction is entered: (1) likelihood of success on the merits; (2) likelihood of irreparable harm; (3) the balance of equities favors the movant; and (4) an injunction serves the public interest.

22. Here, none of the factors were satisfied as no evidence was presented and the Escrow Order was entered *sua sponte*, without notice, without briefing, and without any evidentiary record addressing the required elements for injunctive relief.

No Statutory Authority Supports the Escrow Order

23. The Escrow Order identifies no statutory basis whatsoever for the relief it imposes.

24. It does not cite 11 U.S.C. § 105(a), nor any other provision of the Bankruptcy Code, as authority for compelling the pre-allowance deposit of disputed funds. That omission is telling, as there is no provision of the Bankruptcy Code or the Bankruptcy Rules that authorizes such relief.

25. The only conceivable statutory basis for the Escrow Order is 11 U.S.C. § 105(a). However, § 105(a) does not grant bankruptcy courts a "roving commission to do equity." *United States v. Sutton*, 786 F.2d 1305, 1308 (5th Cir. 1986). The Supreme Court has made clear that a bankruptcy court "may not contravene specific statutory provisions" under the guise of § 105(a). *Law v. Siegel*, 571 U.S. 415, 421 (2014).

26. Section 330 provides a comprehensive framework governing the allowance of professional fees, permitting compensation only after the court determines that such fees are reasonable and necessary. The Escrow Order does not implement that framework, instead it inverts it by requiring mandatory transfer of funds by the Reorganized Debtor before any fees have been allowed.

27. The absence of any cited statutory authority, combined with the clear conflict between the Escrow Order and the fee-allowance scheme under § 330, further underscores that the Order exceeds the Court's authority and is unlikely to withstand appellate review.

28. No party asked for the entry of the Escrow Order. It was determined *sua sponte* at a status conference without prior notice, without briefing, and without any evidentiary record bearing on the four factors required prior to the entry of an injunction.

29. The Escrow Order presupposes that White & Case and AlixPartners are entitled to the funds and that ModivCare is liable. However, fee allowance under § 330 is not ministerial. It requires a judicial determination that fees were reasonable and necessary.

30. The Objections raise specific, detailed factual challenges that the Court has not yet evaluated. The outcome of this dispute is supposed to be uncertain and not predetermined until the Court hears, weighs and determines the factual record. Neither White & Case nor AlixPartners can demonstrate "clear entitlement" to funds for payment of fees and expenses that have not been allowed.

The Escrow Order Violates Due Process

31. ModivCare has a clear property interest in the approximately $1.644 million in disputed funds, which remain its property unless and until the Court orders otherwise following adjudication of the Objections.

32. A property interest includes equitable and reversionary interests. The Reorganized Debtors' property interest in the disputed funds is grounded in two independent sources, each of which is sufficient on its own.

33. First, the confirmed Plan and Confirmation Order create a contingent reversionary interest in favor of the Reorganized Debtors. Plan § 2.5(a) provides that disputed professional fees "shall

be held in trust for the Professionals" pending allowance, which pursuant to the Bankruptcy Code can only be determined pursuant to § 330. Funds held in trust pending allowance are, by the structure of § 1129(a)(9), payable only "to the extent allowed." 11 U.S.C. § 1129(a)(9)(A). Disallowed amounts do not vanish, and the Plan does not assign them to any other party. They revert to the Reorganized Debtors as the only residual claimant under the Plan structure. That contingent reversionary interest is itself property.

34. The Reorganized Debtors hold a present, non-contingent property interest in the administration of the escrow itself. The Plan vests escrow responsibilities in the Reorganized Debtors, including the authority to select the depository, to administer the funds consistent with their fiduciary obligations, and to ensure that the funds are preserved pending disposition under § 330. The Escrow Order strips the Reorganized Debtors of those functions by transferring administration to the Court's registry, which imposes its own administrative regime, registry fees, and procedural requirements in both depositing and subsequently withdrawing the funds. The deprivation of control over the manner of escrow administration is a present, concrete property interest distinct from, and additional to, the contingent reversionary interest in the funds themselves.

35. Each of these property interests is sufficient to support due process protection. Together, they establish that the Reorganized Debtors hold a property interest in the disputed funds that is protected by the requirements of notice, an evidentiary hearing, and a meaningful opportunity to be heard before that interest may be impaired.

36. The compelled transfer of property of the Reorganized Debtor[2] triggers due process protections, including the right to be heard at a meaningful time and in a meaningful manner. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).

37. The Escrow Order was entered *sua sponte*, without notice, without an evidentiary hearing, and without any opportunity for ModivCare to present evidence or argument.

38. The Escrow Order also purports to permit White & Case and AlixPartners to seek additional compensation incurred after the effective date of the plan—relief that no party requested and for which the Court identified no governing standard or statutory basis.

The Escrow Order Improperly Expands Potential Fee Liability

39. The Escrow Order goes even further by providing that White & Case and AlixPartners are "not precluded" from seeking additional compensation from ModivCare, including for fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

40. This language is improper for multiple reasons. First, no party requested such relief. The issue before the Court concerned discrete, pending Fee Applications and corresponding Objections—not prospective, unfiled claims for future compensation.

41. Second, the Court identified no statutory or contractual basis for permitting post-effective-date compensation. The Bankruptcy Code strictly governs the allowance of professional fees, and nothing in § 330 authorizes a court to prospectively endorse or expand a professional's right to seek compensation outside the confines of an actual fee application and the statutory framework. Third, this language injects uncertainty into the parties' rights and obligations under the confirmed plan of reorganization, which is intended to provide finality. By finding that additional, undefined

[2] The ordered transfer also violates the terms of the Confirmed Chapter 11 Plan which requires the funds to be held in escrow by the Reorganized Debtor.

claims for compensation may be asserted against ModivCare, the Escrow Order effectively alters the post-confirmation landscape without notice, briefing, or legal support.

42. Finally, this aspect of the Escrow Order underscores the broader defect: the Court granted relief *sua sponte* that was neither requested nor litigated, and in doing so exceeded the scope of the matters properly before it.

The Escrow Order Imposes an Impossible Retroactive Compliance Deadline

43. The Escrow Order was entered on **April 30, 2026**, yet it required ModivCare to deposit the disputed funds by **April 14, 2026**, more than two weeks before the order even existed.

44. This retroactive deadline is facially defective. A court order cannot compel compliance with an obligation before the order is entered, as doing so deprives the affected party of any meaningful opportunity to timely comply or to seek relief.

45. The imposition of an impossible, backward-looking deadline further underscores the procedural irregularity of the Escrow Order and independently supports a finding that the order violates fundamental due process.

C. SECOND ELEMENT - IRREPARABLE INJURY IF THE STAY IS NOT GRANTED

46. ModivCare will suffer irreparable harm if a stay is not granted. The Escrow Order compels the transfer of approximately $1.644 million from ModivCare's control into the Court's registry prior to any adjudication of the disputed Fee Applications.

47. As an initial matter, the forced transfer and loss of control over significant funds constitutes irreparable harm in and of itself. Once funds are deposited into the Court's registry, ModivCare is deprived of the ability to manage or otherwise control its property during the pendency of the appeal which is harm that cannot be fully remedied after the fact.

D. THIRD ELEMENT – NO HARM TO OTHER PARTIES

48. Granting a stay will not harm any other party. The only effect of a stay would be to preserve the *status quo* pending appellate review, a status quo that has all funds in escrow pursuant to a confirmed chapter 11 plan.

49. There is no evidence that ModivCare will dissipate or misuse the funds during the pendency of the appeal. By contrast, denying a stay would impose a unilateral burden on ModivCare by forcing it to relinquish control of significant funds before trial on the merits and before its appellate rights are adjudicated.

E. FOURTH ELEMENT – GRANTING A STAY WOULD SERVE PUBLIC INTEREST

50. Granting a stay pending appeal serves the public interest. The public has a strong interest in ensuring that bankruptcy courts act within the bounds of their statutory authority and in accordance with fundamental principles of due process.

51. This appeal raises significant legal questions concerning the limits of a bankruptcy court's authority, including whether a court may *sua sponte* compel the pre-allowance deposit of disputed funds without statutory authorization, without an adversary proceeding, and without notice or an evidentiary record. Preserving these issues for appellate review promotes confidence in the integrity and predictability of the bankruptcy system.

52. The public interest also favors adherence to the Bankruptcy Code's carefully constructed framework governing professional compensation. Section 330 reflects Congress's determination that fees may be awarded only after judicial scrutiny for reasonableness and necessity. Allowing orders that circumvent that process would undermine the uniform application of the Code.

53. For these reasons, the public interest strongly favors granting a stay pending appeal.

F. SUMMARY OF RELIEF REQUESTED

54. All four factors weigh decisively in favor of a stay pending appeal. ModivCare has demonstrated a substantial likelihood of success on the merits, as the Escrow Order was entered without statutory authority, without required procedures, and in violation of due process.

55. Absent a stay, ModivCare will suffer irreparable harm through the loss of control over significant funds and the impairment of its appellate rights.

56. By contrast, a stay will not substantially harm any other party, this is further evidenced by the fact that neither W&C nor AlixPartners filed a motion asking the Court to order the funds to be deposited in the Court's registry.

57. Finally, granting a stay serves the public interest by ensuring adherence to the Bankruptcy Code, protecting due process, and preserving meaningful appellate review. Accordingly, a stay of the Escrow Order pending appeal is warranted.

PRAYER

WHEREFORE, ModivCare respectfully requests that the Court enter an order, substantially in the form submitted herewith: (i) granting the relief requested in this Emergency Motion and staying the Court's Escrow Order; and (ii) granting ModivCare such other and further relief as the Court deems just and proper.

Dated: May 7, 2026.

Respectfully submitted,

/s/ Johnie Patterson
Johnie Patterson
SBN 15601700

OF COUNSEL:
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Houston, TX 77208-1301
(713)956-5577 Phone
(713)956-5570 Fax
jjp@walkerandpatterson.com

CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Emergency Motion was served on May 7, 2026, via the Court's CM/ECF system to all parties consenting to service through the same, and via email to White & Case and AlixPartners.

By:*/s/Johnie Patterson*
Johnie Patterson

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

In re:	§	
	§	
	§	Chapter 11
MODIVCARE, INC.	§	
	§	
	§	Case No. 25-90309
Debtors.	§	
	§	Jointly Administered
	§	

STAY PENDING APPEAL

It is

ORDERED that enforcement/compliance with the Court's *Order Requiring the Reorganized Debtors to Deposit Funds in Escrow* [ECF No. 1502] currently on appeal is stayed pending final determination on appeal.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

United States Bankruptcy Court
Southern District of Texas
ENTERED
May 11, 2026
Nathan Ochsner, Clerk

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

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

SCHEDULING AND BIFURCATION ORDER

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the "Fee Applications"); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (collectively, the "Fee Objections"); *White & Case LLP's Reply in Support of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025* [Docket No. 1410] and the *Reply of AlixPartners, LLP to Objection to Its Final Fee Application* [Docket No. 1411] (collectively, the "Replies"); *Motion to Compel White & Case LLP to Respond to Discovery Requests* [Docket No.

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

1409]; *Modivcare Topco, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1427]; *White & Case LLP's Objection to ModivCare TopCo, LLC's Motion to Compel* [Docket No. 1458]; *White & Case LLP's Objection to ModivCare TopCo, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1466]; and in accordance with the United States Bankruptcy Court for the Southern District of Texas (the "Court") rulings on the record at the hearing held on April 30, 2026, it is hereby ORDERED that:

1. The Court will adjudicate the reasonableness of White & Case LLP's ("White & Case") and AlixPartners LLP's ("AlixPartners") fees under section 330 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") first based on the evidentiary record already established in the chapter 11 cases, the Fee Applications, the Fee Objections, and the Replies ("Phase 1"). The issues adjudicated during Phase 1 shall include, but not be limited to whether:

   i. this Court may or should amend its October 31, 2025 orders authorizing the retention of (a) White & Case as bankruptcy counsel to the official committee of unsecured creditors (the "Committee") effective as of September 9, 2025 and approving White & Case's billing rates for this representation [Docket No. 616] and (b) AlixPartners as financial advisor to the Committee effective as of September 10, 2025 and approving the compensation terms set forth in the applicable engagement letter [Docket No. 644];

   ii. TopCo may object to the reasonableness of any time entry or expense item not specifically identified in the Fee Objections;

   iii. there is a basis to establish a different standard under which to assess the reasonableness of the Debtors' professionals' fees which this Court has approved without objection and the Committee's professionals' fees sought in the Fee Applications;

   iv. under the applicable standard and without any additional discovery, the Court can determine the reasonableness of the fees being sought; and

2. The parties shall submit any additional briefing for the Phase 1 issues on or before June 3, 2026. Any response briefs shall be due on or before June 8, 2026.

3. In Phase 1 the Court will not consider any additional evidence beyond the Fee Applications, the Fee Objections, the Replies, and matters as to which this Court may take judicial notice. The hearing on Phase 1 will be on June 9, 2026, at 10:00 a.m.

4. If the Court determines that it cannot fully resolve the Objection and the Fee Applications in Phase 1, the Court will consider additional evidence related to the Fee Objections that are not resolved in Phase 1 ("Phase 2"). All Parties reserve the right to seek any appropriate discovery in Phase 2 related to any issues not adjudicated in Phase 1. A hearing on Phase 2 will, if necessary, be set by further order of the Court.

5. All discovery related to the Fee Applications shall be stayed pending resolution of Phase 1 or other order of the Court.

6. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

7. This Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: May 09, 2026

Alfredo R Pérez
United States Bankruptcy Judge

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

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

WHITE & CASE LLP'S (I) EMERGENCY MOTION FOR ENTRY OF AN ORDER FINDING MODIVCARE TOPCO, LLC IN CIVIL CONTEMPT, AND (II) OBJECTION TO MODIVCARE TOPCO, LLC'S EMERGENCY MOTION FOR STAY PENDING APPEAL

Emergency relief has been requested, and such relief is respectfully requested not later than 8:30 a.m. (prevailing central time) on Wednesday, May 20, 2026.

To the extent that you have received notice, if you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases of the debtors and debtors in possession (the "Debtors" and after the Effective Date, collectively, the "Reorganized Debtors"), respectfully submits this (I) *Emergency Motion for Entry of an Order Finding ModivCare TopCo, LLC in Civil Contempt* (the "Contempt Motion"), and (II) objection (the "Objection") to

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Modivcare Topco, LLC's Emergency Motion for Stay Pending Appeal [Dkt. No. 1518] (the "Stay Motion").[2]

PRELIMINARY STATEMENT

1. On December 15, 2025, the Court entered the Confirmation Order, confirming the Debtors' Plan. At the time, several estate professionals had not yet submitted final fee applications or received compensation from the estates. The Debtors' Plan therefore included the following provision to ensure payment of estate professionals' administrative claims, once allowed:

> As soon as reasonably practicable after the Confirmation Date and no later than the Effective Date, ***the Debtors shall establish and fund the Professional Fee Escrow*** with Cash equal to the Professional Fee Claims Estimate. No Liens, Claims, or Interests shall encumber the Professional Fee Escrow or Cash held in the Professional Fee Escrow in any way. Subject to the DIP Orders, ***the Professional Fee Escrow (including funds held in the Professional Fee Escrow) (i) shall not be and shall not be deemed property of the Debtors, their Estates, or the Reorganized Debtors, and (ii) shall be held in trust for the Professionals*** . . .

Plan Art. II § 2.5(a) (emphasis added).

2. The Court confirmed the Plan in part because it implemented this common solution to ensure that the Debtors would pay administrative claims in full, in cash when allowed, as required under section 1129(a)(9) of the Bankruptcy Code.

3. Months later, on April 3, 2026, Cresa LLC ("Cresa"), a Court-approved and retained real estate consultant and advisor to the Debtors, filed a motion to enforce this Court's order approving its final fee application, granted without opposition, based on the Reorganized Debtors' "unjustified refusal to comply with a clear, final, and binding order of this Court." [Dkt

[2] Capitalized terms used but not defined in this Objection have the meanings ascribed to them in the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (the "Confirmation Order"), including Exhibit A thereto (the "Plan").

No. 1412]. Cresa's fees should have been funded into the Professional Fee Escrow, raising concerns about whether the Reorganized Debtors had in fact funded the Professional Fee Escrow, as required by the Confirmation Order, or intended to honor their obligations to pay estate professionals.

4. Three days later, at the April 6 status conference, the Court asked counsel to confirm that TopCo is in fact a Reorganized Debtor and inquired about Cresa's claim, noting that the Court "had approved a fee app for [Cresa] on an uncontested basis, and they haven't been paid."[3] Based on this background, the Court stated that "to the extent I award additional fees, I don't want there to be any issue with the collection of those fees" and ordered the Reorganized Debtors to place unpaid and disputed amounts in the Court's registry.[4]

5. This did not impose any new obligations on the Reorganized Debtors, who were already required to escrow unpaid estate professional fees under the Confirmation Order. TopCo's counsel, Walker & Patterson, P.C. ("Walker"), was apparently unaware of this requirement, telling the Court: "I don't want you to read anything into [Cresa's motion] to suggest that there are issues with paying professionals that have had their fees approved and ***then require to start escrowing disputed amounts of fees***."[5] Based on this record, and the apparent ongoing violation of the Confirmation Order, the Court issued an oral ruling on April 6, and then entered the *Order Requiring the Reorganized Debtors to Deposit Funds in Escrow With the Court* [Dkt. No. 1502]

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[3] Hr'g. Tr. (Apr. 6, 2026) at 5:21-24.

[4] *Id.* at 5:24-6:9.

[5] *Id.* at 7:23-8:1 (emphasis added). Walker was not counsel to the Debtors prior to the Effective Date, but it did file a "statement" on behalf of the Consenting Creditors regarding White & Case's retention application. *See Statement of Consenting Creditors with Respect to the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* [Dkt No. 589].

(the "Escrow Order") on April 30, requiring the Reorganized Debtors to place unpaid and disputed amounts sought by White & Case and AlixPartners in the Court's registry.

6. TopCo registered its protest of the Court's decision through numerous filings. Even before the Court entered the Escrow Order, TopCo filed a motion seeking reconsideration. Once the Court entered the Escrow Order, TopCo then appealed to the U.S. District Court for the Southern District of Texas. To date, TopCo still has not satisfied the very basic terms of the Escrow Order. TopCo is of course free to challenge this Court's decisions through all proper channels, but it cannot simply ignore a federal court order.

7. On May 7, a week after the Court entered the Escrow Order and after White & Case's multiple requests for TopCo to confirm the status of the funds went ignored, White & Case sent a letter[6] indicating its intent to file a motion for civil contempt if TopCo did not comply with the Escrow Order. Shortly thereafter, TopCo filed the Stay Motion. That motion is replete with inaccurate and unsupportable statements and raises, for the first time, that it would be impossible for TopCo to comply with the Escrow Order.

8. The next day, on May 8, White & Case and Walker met and conferred. In advance of the meet and confer, White & Case twice reiterated its requests for detail regarding the Professional Fee Escrow. Walker refused to answer by email, and provided no further clarity at the meet and confer. Walker explained that it intended to comply with the Escrow Order and that it had contacted the "finance" department in the clerk's office for instructions on depositing funds in the Court's registry. But Walker was unable to address the most basic questions: (i) when it first contacted the clerk's office, including whether it was before or after receiving the Letter,

[6] A true and correct copy of the letter from White & Case to Walker, dated May 7, 2026 (the "Letter") is attached as **Exhibit 1**.

(ii) the impediments to funding into the registry, including any issues identified by the clerk's office, (iii) the current location of the funds earmarked for payment of estate professional fees, including the account in which they are held, the parties that have control over such accounts, and whether there is an escrow agreement or escrow agent, (iv) the Reorganized Debtors' interest in administering the supposedly escrowed funds, as represented in the Stay Motion, and (v) the fees and conditions associated with funding into the Court's registry, as represented in the Stay Motion. The meet and confer thus raised more questions than answers as to why TopCo had not already complied with the Escrow Order, despite knowing about the Court's ruling for over a month, and whether TopCo continues to violate the Confirmation Order. White & Case sent interrogatories and document requests to TopCo shortly after the meet and confer to obtain actual answers to these basic questions.[7] Since receiving the Letter, TopCo has paid lip service to its intent to comply with this Court's order, but its actions speak loudly to the contrary.

9. The Stay Motion provides no basis for TopCo to continue ignoring this Court's orders. It fails from its most basic premise: that the Escrow Order is a new affirmative injunction. It is not, and the Court is well within its discretion to enforce its own orders by requiring disputed funds to be placed in the Court's registry. It also fails on its incorrect assertion that the Reorganized Debtors own and control funds they are required to escrow. The Plan is clear that the professional fee escrow "***shall not be and shall not be deemed property of the Debtors, their Estates, or the Reorganized Debtors***." Full stop.

10. Even if TopCo were correct on either point (it is not), it does not come close to satisfying the requirements for a stay pending appeal. It fails to demonstrate any likelihood of success on the merits. The funds at issue are not TopCo's property, the Escrow Order does not

[7] The interrogatories are attached as **Exhibit 2** and the document requests are attached as **Exhibit 3**.

upset any reversionary interests in escrowed funds (an interest that TopCo misstates), TopCo has no interest in administering escrowed funds (it cannot point to an escrow agreement), and estate professionals are already entitled under the Plan and Confirmation Order to seek additional fees. It cannot show irreparable harm, citing only loss of control over funds it does not control. It cannot show disproportional harm, as estate professionals, and not TopCo, will be harmed if funds are not placed in the Court's registry. And the public interest is served by litigants adhering to Court orders.

11. The Court should deny the Stay Motion and hold TopCo in civil contempt for failing to adhere to the Escrow Order and requiring it to pay White & Case's legal fees related to this Contempt Motion and for opposing the baseless Stay Motion.

JURISDICTION AND VENUE

12. The United States Bankruptcy Court for the Southern District of Texas (this "**Court**") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

13. The basis for the relief requested herein is section 105(a) of title 11 of the United States Code (the "**Bankruptcy Code**").

ARGUMENT

I. The Court Should Hold TopCo in Civil Contempt for Its Ongoing and Unjustified Failure to Comply With the Escrow Order

14. The Court has ample authority to enforce the Escrow Order through its inherent contempt power and under section 105(a) of the Bankruptcy Code. *See In re Bradley*, 588 F.3d 254, 266 (5th Cir. 2009) ("It is widely recognized . . . that [bankruptcy courts] do possess civil contempt power [and] . . . [i]n *Placid Refining Co. v. Terrebonne Fuel & Lube, Inc. (In re*

Terrebonne Fuel & Lube, Inc.), 108 F.3d 609, 613 (5th Cir.1997), we joined the circuits holding that the source is statutory, based on 11 U.S.C. § 105."). Under well-established Fifth Circuit precedent, a party is in civil contempt where the moving party establishes: (1) a court order was in effect; (2) the order required certain conduct by the respondent; and (3) the respondent failed to comply with the court's order. *In re Bradley*, 588 F.3d at 264 (citing cases); *see Test Masters Educational Services, Inc. v. Singh*, 428 F.3d 559, 582 (5th Cir. 2005) (same).[8] All three elements are satisfied here.

15. *First,* the Court entered the Escrow Order on April 30 and it was immediately effective and enforceable upon its entry. *See* Escrow Order ¶ 4. *Second*, the Escrow Order unambiguously required the Reorganized Debtors to deposit in the Court's registry "funds sufficient to pay all unpaid amounts sought in the Applications."[9] *Id.* ¶ 1. That the Court did not enter the Order until April 30, following a status conference on TopCo's reconsideration motion, and the order still included an April 14 deadline to deposit funds (a relic of a proposed order submitted after the April 6 status conference) does not make funding optional or excuse performance. *Third*, TopCo has failed to move funds to the Court's registry for more than one week after the Court entered the Escrow Order in violation of this Court's order. On May 7, after TopCo ignored White & Case's several requests to confirm the status of the deposit, the Court clerk confirmed that the Reorganized Debtors had not deposited the funds as required. TopCo responded to White & Case's notice of intent to seek civil contempt if funds were not placed in the Court's registry by close of business on May 8 with its Stay Motion.

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[8] The Fifth Circuit has recognized that contempt is an available remedy when a party violates "an order before it is reduced to writing." *In re Bradley*, 588 F.3d at 265.

[9] The total amount required to be deposited is $1,644,896.98.

16. Perhaps recognizing that its several filings to date do not excuse compliance with the Escrow Order,[10] Walker has represented its client is holding the funds and "intends" to comply with the Escrow Order, subject to receiving instructions from the "finance" department of the clerk's office. Walker simultaneously argues that it is impossible to comply with the Escrow Order based on the April 14 deadline. It is still unclear which lane TopCo is choosing—whether it is awaiting instructions to deposit funds, or whether it will continue to argue that it is impossible to comply with the Escrow Order.

17. In addition to TopCo's clear non-compliance with the Escrow Order, TopCo is also likely in violation of the Confirmation Order. There is no doubt that the Confirmation Order is in effect and that pursuant to such order, the Debtors were required to establish and fund the "Professional Fee Escrow." *See* Plan Art. II § 2.5(a); Confirmation Order § 3 (incorporating the terms of the Plan). "Professional Fee Escrow" is defined in the Plan as an "escrow account." Plan Art. I. Walker's representation that its clients are holding the professional fee funds is in itself a violation of the Confirmation Order.[11] TopCo is not a neutral third party, and Walker has failed to identify an escrow agent. TopCo's inability to demonstrate that the funds are held in a proper escrow arrangement—rather than merely in TopCo's own possession—underscores precisely why it is now defying the Escrow Order.

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[10] TopCo's notice of appeal did not stay its obligation to comply with the Escrow Order. Fed. R. Bankr. P. 8007; *see also Seven Arts Filmed Ent. Ltd. v. Jonesfilm*, 538 F. App'x 444, 446-47 (5th Cir. 2013) (affirming second contempt ruling on party that did not seek to stay the district court's prior contempt order or comply with the contempt order while pursuing an appeal) (quoting *Maness v. Meyers*, 419 U.S. 449, 458 (1975) ("[A]ll orders and judgments of courts must be complied with promptly. If a person to whom a court directs an order believes that order is incorrect the remedy is to appeal, but, absent a stay, he must comply promptly with the order pending appeal.")).

[11] During the April 30, 2026 status conference, Walker could not confirm whether the funds were in an escrow account and merely stated "I can't tell you it's a -- . . . separate account, but ***I think it is. I think it's*** an escrow account, because I got accounting on it this morning." H'rg. Tr. (Apr. 30, 2026) at 26:18-20 (emphasis added).

18. After finding a party in civil contempt, courts have ample authority to award a full range of remedies, including attorney fees. *In re Nelkin & Nelkin P.C.*, No. 23-34054, 2025 WL 2803857, at *5 (Bankr. S.D. Tex. Oct. 1, 2025) ("A court may award costs and attorney's fees if it finds the respondent in contempt of a court order.") (citing *Chemical Company v. Chemical Cleaning, Inc.*, 434 F.2d 1212, 1215 (5th Cir. 1970)). White & Case has incurred significant fees and costs in connection with TopCo's ongoing violation of the Escrow Order and Confirmation Order, including this motion for contempt and response to TopCo's erroneous request to stay the Escrow Order pending its equally erroneous appeal. If it was not evident before, it is now that TopCo's strategy is to increase litigation costs at every step of this dispute. Candor before this Court is an afterthought. This Court should order TopCo to reimburse White & Case for its fees and costs in connection with the immediate motion practice.

II. The Court Should Deny TopCo's Motion to Stay

A. Topco Fails to Satisfy the Standard for a Stay of the Escrow Order Pending Appeal

19. "The Fifth Circuit has stated that a stay 'is an extraordinary remedy.'" *In re Barrow Shaver Res. Co.*, No. 24-33353 (ARP), 2025 WL 685513, at *2 (Bankr. S.D. Tex. Mar. 3, 2025) (quoting *Thomas v. Bryant*, 919 F.3d 298, 303 (5th Cir. 2019)); *Yucaipa Corp. Initiatives Fund, ILP v. Piccadilly Rests., LLC*, 2014 WL 1871889, at *2 (W.D. La. May 6, 2014) (explaining that a stay pending appeal requires "a substantial showing by the movant, and is not to be granted lightly"). Courts consider whether (i) the movant has made a showing of a likelihood of success on the merits of the appeal, (ii) the movant has made a showing that it will suffer an irreparable injury if the stay is not granted, (iii) a stay would substantially harm the other parties, and (iv) a stay would serve the public interest. *In re Barrow Shaver Res. Co.*, 2025 WL 685513, at *2 (citing *In re First S. Savs. Ass'n*, 820 F.2d 700, 704 (5th Cir. 1987)). A movant has the burden "of proving

by a preponderance of the evidence that the stay pending appeal should be granted." *In re Dernick*, No. 18-32417 (EVR), 2019 WL 236999, at *2 (Bankr. S.D. Tex. Jan. 16, 2019). TopCo has failed to satisfy this burden.

20. *First*, TopCo is not likely to succeed on the merits. Success in its appeal requires the District Court to accept TopCo's incorrect assertion that the funds at issue are TopCo's property. The Plan is unambiguous: the Professional Fee Escrow "shall not be and shall not be deemed property of the Debtors, their Estates, or the Reorganized Debtors . . . [and] shall be held in trust for the Professionals." Plan Art. II, § 2.5(a). The Debtors proposed, litigated, and obtained confirmation of this Plan. They cannot now, through their successor, claim a property interest in funds that, by the express terms of their own Plan, do not belong to them. *See* Plan Art. II, § 2.5(a). White & Case (and the Court) have also repeatedly directed them to these provisions of the Confirmation Order and Plan, which TopCo conveniently ignores in its Stay Motion.[12] TopCo's assertion of a "contingent reversionary interest" in the escrowed funds, Stay Mot. ¶¶ 33–34, is also foreclosed by the Plan's plain language.[13] *See* Plan Art. II, § 2.5(a). Any amounts disallowed under section 330 would be addressed through the Plan's distribution framework, but that does not transform the Professional Fee Escrow into TopCo's property during the pendency of the fee dispute. Similarly, TopCo's claim that it holds a "present, non-contingent property interest in the administration of the escrow itself" is equally unavailing. Stay Mot. ¶ 34. TopCo cannot point to any escrow agreement, any fiduciary appointment, or any Plan provision granting it discretionary authority over the manner in which the Professional Fee Escrow is maintained. *See generally id.*

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[12] *See generally White & Case LLP's Objection to ModivCare TopCo, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Dkt. No. 1466]; Hr'g. Tr. (Apr. 30, 2026) at 26:13-14 ("There's a provision in the Order that says it's set aside in a separate bank account.").

[13] During the May 8 meet and confer, White & Case asked Walker how any alleged reversionary interest would be affected by moving the funds to the Court's registry and Walker was unable to provide a response.

As discussed above, TopCo has not even confirmed whether, in fact, the funds are in an escrow account—as opposed to simply "set aside." *See* Hr'g Tr. (Apr. 30, 2026) at 26:9-20. The Plan requires the Reorganized Debtors to establish and fund the escrow—an obligation, not a property right. *See* Plan Art. II, § 2.5(a); Art. IX, § 9.1(ix). The Escrow Order does not deprive TopCo of a protected property interest; it merely directs that funds already required to be held in trust for Professionals be transferred to the Court's registry. *See generally* Escrow Order. Because the funds are not TopCo's property, TopCo's due process arguments collapse. *See James v. Cleveland Sch. Dist.,* 45 F.4th 860, 864 (5th Cir. 2022) ("Without a cognizable interest in liberty or property, "there is nothing subject to Due Process protections and our inquiry ends.") (internal quotations omitted).

21. TopCo's characterization of the Escrow Order as a "mandatory injunction" requiring an adversary proceeding under Federal Rule of Bankruptcy Procedure 7001(7) is wrong. Stay Mot. ¶¶ 17-20. The Escrow Order does not grant injunctive relief; it enforces the Confirmation Order and Plan by requiring TopCo to do what it was already obligated to do: ensure that disputed professional fees are properly escrowed. *See* Plan Art. II § 2.5(a); Confirmation Order § C (stating that the Plan satisfies the requirements of section 1129(a) of the Bankruptcy Code); § 3 (incorporating the terms of the Plan). A court order further enforcing its prior directives is not an injunction and the procedural protections applicable to injunctive relief do not apply. *See* Plan Art. XI § 11.1(g),(k) (stating that the Bankruptcy Court retains jurisdiction to enforce and implement the Plan and Confirmation Order); *Am. Airlines Inc. v. Allied Pilots Ass'n,* 228 F.3d 574, 585 (5th Cir. 2000) (holding that a bankruptcy court's authority under section 105 of the Bankruptcy Code to enforce its own orders cannot be reasonably questioned); *In re Malmgren*, 277 B.R. 755, 759 (Bankr. E.D. Wis. 2002) ("If an order is to have any true meaning, if a party is

to be able to place any justifiable reliance on an order, if a court is to have any credibility and command any respect, then it *must* enforce its own orders.") (emphasis in original). Likewise, TopCo's argument that the Escrow Order lacks statutory authority fails. *See* Stay Mot. ¶¶ 23–27. The Escrow Order is grounded in the Court's authority to enforce its own Confirmation Order and the terms of the confirmed Plan. To the extent additional authority is needed, section 105(a) empowers the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions" of the Bankruptcy Code, including orders ensuring compliance with a confirmed plan. *See* 11 U.S.C. § 105(a).

22. *Second*, TopCo fails to demonstrate irreparable harm. TopCo's sole basis for claiming irreparable injury is the alleged "loss of control" over the disputed funds. *See* Stay Mot. ¶¶ 46–47. But TopCo cannot suffer irreparable harm from losing control over funds it does not own and is not entitled to control. *See supra* ¶ 20. The transfer of escrowed funds from one custodial arrangement to another—from an escrow TopCo was obligated to maintain to the Court's own registry—does not constitute a cognizable injury, let alone an irreparable one. *In re Dernick*, 2019 WL 236999, at *4 ("Not only are Debtors' arguments premised on the suffering of economic losses, no evidence was introduced at the hearing to corroborate how the payment of attorneys' fees would jeopardize their living expenses."). To the contrary, the Escrow Order merely ensures that the funds are held in a neutral, court-supervised account pending resolution of the fee dispute. *See generally* Escrow Order. TopCo has identified no business disruption, no operational harm, and no injury beyond the purported loss of control over funds that were never its property. *See In re Barrow Shaver Res. Co., LLC*, 2025 WL 685513, at *6 ("[E]conomic losses are not typically irreparable when monetary damages are available."). In fact, TopCo's failure to provide any "testimonial or documentary evidence" to "carry their burden of proof in regards to suffering an

irreparable injury" is fatal for this factor. *In re Dernick*, 2019 WL 236999, at *4; *see also In re MTE Holdings, LLC*, No. 19-12269, 2021 WL 4203339, at *3 (Bankr. D. Del. Sept. 15, 2021) ("[I]f the movant does not make the requisite showings on either of [likelihood of success on the merits or irreparable harm], the [court's] inquiry into the balance of harms . . . is unnecessary, and the stay should be denied without further analysis.") (internal quotations omitted).

23. *Third*, granting a stay would substantially harm Committee professionals and other estate professionals with outstanding administrative claims. *See In re Dernick*, 2019 WL 236999, at *4 ("While no strict definition of 'substantial harm' exists, courts have generally found that a significant delay in the administration of an estate, or a delay in the distribution to creditors under a plan generally satisfies the criterion of harm to other parties."). TopCo asserts that a stay would merely "preserve the status quo," *see* Stay Mot. ¶ 48, but the true status quo is one in which TopCo has likely failed to comply with the Plan's escrow requirements and has vigorously resisted every effort to ensure that disputed professional fees are properly safeguarded. *See generally* Letter. TopCo's sustained opposition to transferring funds to the Court's registry—combined with its failure to comply with the Escrow Order for over a week after its entry—raises serious concerns about whether the funds are being properly maintained and whether they will be available to satisfy fees ultimately allowed under section 330. This concern is heightened by Cresa's prior efforts to collect fees already approved by this Court on an uncontested basis and subject to the same Professional Fee Escrow under the Plan. *See* [Dkt No. 1412] ¶ 24. In light of this record, TopCo cannot credibly claim that there is "no evidence" it will "dissipate or misuse the funds." Stay Mot. ¶ 49.

24. It is the Committee's professionals, who rendered services essential to the administration of these chapter 11 cases, that are exposed to risk that funds will dissipate while the

appeal is pending. These professionals hold beneficial interests in the funds and face the prospect of nonpayment if those funds are dissipated, commingled, or otherwise rendered unavailable. *See* Plan Art. II § 2.5(a) (stating that the funds "shall be held in trust for the Professionals"). TopCo, on the other hand, only has an obligation to fund the escrow. The balance of harms weighs decisively against a stay.

25. *Fourth*, the public interest weighs against granting a stay. TopCo's framing of the public interest factor inverts the relevant inquiry. *See* Stay Mot. ¶¶ 50–53. The question is not whether bankruptcy courts should act within their statutory authority—they should, and this Court has done so. The question is whether the public interest is served by permitting a reorganized debtor to defy a court order enforcing the terms of its own confirmed plan. It is not. *See In re Dernick*, 2019 WL 236999, at *5 ("In bankruptcy, the public policy is to have an orderly administration of the debtor's assets via their bankruptcy estate, such that the debtor may be able to gain a fresh start, by satisfying valid claims against that estate.") (citing cases); *In re Metiom, Inc.*, 318 B.R. 263, 272 (S.D.N.Y. 2004) ("This Court finds that the public interest in the expeditious administration of bankruptcy cases as well as in the preservation of the bankrupt's assets for purposes of paying creditors, rather than litigation of claims lacking a substantial possibility of success, outweighs the public interest in resolving the issues presented here on appeal."). There is, however, a paramount public interest in ensuring that litigants comply with court orders and granting a stay to a party that has openly defied the Escrow Order would send a troubling signal that parties may disregard judicial directives. The public interest is also further served by ensuring that professionals who accept engagements to represent official committees in chapter 11 cases can do so with confidence that their allowed fees will be paid in accordance with the terms of a confirmed plan. *See In re Dernick*, 2019 WL 236999, at *5 ("[I]t is prudent to

consider the interests of third-parties who act in reliance of the bankruptcy court's ruling."). Holding otherwise would have a chilling effect on future committee representations, which would be significant and contrary to the public interest.

26. As their last attempt to salvage their Stay Motion, TopCo argues that it is "impossible" to comply with the Escrow Order and that the Escrow Order is "facially defective" because it references an April 14 compliance deadline despite being entered on April 30. *See* Stay Mot. ¶¶ 43–45. This argument is without merit. The relevant timeline refutes TopCo's position. At the April 6 status conference, the Court orally directed the Reorganized Debtors to deposit disputed professional fee amounts into the Court's registry. *See* Hr'g Tr. (Apr. 6, 2026) at 6:2-9. TopCo was on notice of this order over a week before the April 14 date referenced in the Escrow Order. *See id.* Rather than comply, TopCo filed a Motion to Reconsider on April 9, seeking to avoid the deposit requirement entirely. *See generally* Mot. to Reconsider. The Escrow Order, entered on April 30, reduced the Court's prior oral ruling to a written order. *See generally* Escrow Order; *see also* Hr'g Tr. (Apr. 30, 2026) at 5:2-13. The continued reference to April 14 reflects the Court's expectation that TopCo would have already complied or would otherwise comply expeditiously.

27. To the extent the April 14 date constitutes a scrivener's error or an artifact of the drafting process, it does not render the Escrow Order void or unenforceable. Courts routinely look past minor clerical errors in orders where the substance and intent of the order are clear. *Cf.* Fed. R. Civ. P. 60(a) (authorizing correction of clerical mistakes in orders); *Rivera v. PNS Stores*, Inc., 647 F.3d 188, 196 (5th Cir. 2011) ("Rule 60(a) finds application where the record makes apparent that the court intended one thing but by merely clerical mistake or oversight did another."); *United States v. Roth*, 164 F.2d 575, 576 (2d Cir. 1948) (finding the district court erred in refusing to

permit a bankruptcy court's Rule 60(a) correction where the judgment mistakenly listed the year as "1939" instead of "1938"). The Escrow Order is unambiguous in its operative directive: the Reorganized Debtors shall deposit the disputed funds into the Court's registry and the order is "effective immediately." Escrow Order ¶¶ 1, 4. TopCo's attempt to seize upon a date reference to avoid compliance with a clear judicial directive is precisely the type of gamesmanship that this Court should reject. Indeed, TopCo's own conduct confirms that it understood the order required immediate compliance: rather than seek clarification of the deadline, TopCo filed a notice of appeal[14] and, eventually, the Stay Motion. These actions are consistent with an understanding that the order was operative and enforceable, not "facially defective."

B. The Stay Motion Does Not Comply with the Bankruptcy Local Rules

28. Counsel fails to certify the accuracy of the Stay Motion as required for all emergency motions by Bankruptcy Local Rule 9013-1(i). *See* S.D.T.X. LBR 9013-1(i). This is not just a procedural misstep. White & Case has serious concerns about the accuracy of several statements in the Stay Motion. Despite informing Walker of this deficiency and raising its concerns during the May 8 meet and confer, Walker has not confirmed the accuracy of their statements or agreed to amend the motion.

29. The Stay Motion also fails to articulate any basis for emergency relief. Bankruptcy Local Rule 9013-1(i) requires that a motion seeking emergency consideration set forth the reasons why such expedited treatment is warranted and specify the date by which relief is requested. *Id.* TopCo offers no explanation as to why emergency consideration is necessary, particularly given that the Escrow Order was entered on April 30, 2026, and TopCo waited seven days—until May

[14] *See Notice to Appeal* [Dkt No. 1506].

7—to file the Stay Motion. *See generally* Stay Mot. TopCo's own delay in seeking relief belies any claim of urgency.

30. Counsel has also neglected to properly notice the Stay Motion under the Complex Procedures. Among other things, it misstates parties' rights to respond. Complex Procedures at G. These procedural deficiencies further demonstrate TopCo's disregard for the rules of this Court and provide an independent basis to deny the Stay Motion.

EMERGENCY CONSIDERATION

31. In light of the facts and circumstances set forth herein, White & Case respectfully requests emergency consideration of this Contempt Motion. TopCo has requested an emergency hearing on the Stay Motion, which is directly tied to the relief sought in this Contempt Motion and the underlying Escrow Order. The Contempt Motion arises from the same operative facts—namely, TopCo's failure to comply with the Escrow Order and ensure disputed professional fee funds are protected in the Court's registry until final adjudication on the Fee Applications. Accordingly, the issues raised herein should be heard contemporaneously with the Stay Motion.

NOTICE

32. White & Case will provide notice of this Contempt Motion and Objection to the following parties: (a) the Reorganized Debtors and their counsel thereto; and (b) the Office of the U.S. Trustee for Region 7. White & Case submits that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

33. White & Case respectfully requests that the Court deny the Stay Motion and enter the Order.

[*Remainder of Page Intentionally Left Blank*]

May 11, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF ACCURACY

I certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Charles R. Koster
Charles R. Koster

CERTIFICATE OF SERVICE

I certify that on May 11, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

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)
	)	(Jointly Administered)
Reorganized Debtors. [1]	)	
	)	**Re: Docket No. ___**

ORDER (I) FINDING MODIVCARE TOPCO, LLC IN CIVIL CONTEMPT, (II) AWARDING ATTORNEY FEES AND COSTS TO W&C, AND (III) GRANTING RELATED RELIEF

Upon the motion (the "**Motion**") of White & Case LLP ("**W&C**") for entry of an order (this "**Order**") finding ModivCare TopCo, LLC ("**TopCo**") in civil contempt and awarding attorney fees and costs to W&C related to the Motion and in defending *Modivcare Topco, LLC's Emergency Motion for Stay Pending Appeal* [Dkt. No. 1518] (the "**Stay Motion**"),[2] and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested is appropriate under section 105(a) of the title 11 of the United States Code; and this Court having found that W&C's notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms not defined herein shall have the meaning given to them in the Motion.

and having heard the statements in support of the relief requested therein at a hearing before this Court (the "**Hearing**"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is HEREBY ORDERED THAT:

1. TopCo is found to be in civil contempt for failing to adhere to the Escrow Order and Confirmation Order.

2. TopCo shall pay W&C its reasonable attorneys' fees and expenses incurred in connection with the preparation, filing, and prosecution of the Motion and opposing the Stay Motion (collectively, the "**Enforcement Costs**"). TopCo shall pay the Enforcement Costs within seven (7) business days of W&C providing TopCo with the total amount of the Enforcement Costs.

3. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of Bankruptcy Rule 2002 and the Bankruptcy Local Rules are satisfied by such notice.

4. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

5. W&C is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

6. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order, including to award sanctions against TopCo for any failure to comply with the terms and provisions of this Order.

Dated _____, 2026
Houston, Texas

_____
Alfredo R. Pérez
United States Bankruptcy Judge

EXHIBIT 1

WHITE & CASE

May 7, 2026

White & Case LLP
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whitecase.com

VIA E-MAIL

Miriam T. Goott, Esq.
Johnie Patterson, Esq.
Walker & Patterson, P.C.
P.O. Box 61301
Houston, TX 77208

Re: *In re: ModivCare Inc. et al.*, Case No. 25-90309 (ARP)

Dear Counsel:

We write to provide notice of our intent to file a motion seeking civil contempt of Court if your clients do not comply with the Escrow Order [Dkt. No. 1502] by close of business on May 8, 2026. The Court entered the Escrow Order a week ago, and you have not sought—let alone obtained—a stay relieving you of your obligaiton to comply with the Escrow Order pending your appeal. You have ignored our request for confirmation that you would comply, and we have confirmed with the clerk of the Court that you have not complied.

Under well-established Fifth Circuit precedent, a party is in civil contempt when the moving party establishes: (1) a court order was in effect; (2) the order required certain conduct by the respondent; and (3) the respondent failed to comply with the court's order. *See, e.g.*, *In re Bradley*, 588 F.3d 254, 264 (5th Cir. 2009) (citing cases); *Test Masters Educational Services, Inc. v. Singh*, 428 F.3d 559, 582 (5th Cir. 2005) (same). All three elements are readily satisfied here. The Court entered the Escrow Order on April 30, 2026, which was immediately effective and enforceable upon entry. The Escrow Order required the Reorganized Debtors to pay all disputed amounts of professional fees into the registry of the Court, and the Reorganized Debtors have failed to do so. The law is clear that the filing of your notice of appeal does not stay your obligation to comply with the Court's order. *See* Fed. R. Bankr. P. 8007; *see also Seven Arts Filmed Ent. Ltd. v. Jonesfilm*, 538 F. App'x 444, 446-47 (5th Cir. 2013) (affirming second contempt ruling on party that did not seek to stay the district court's prior contempt order or comply with the contempt order while pursuing an appeal) (quoting *Maness v. Meyers*, 419 U.S. 449, 458 (1975) ("[A]ll orders and judgments of courts must be complied with promptly. If a person to whom a court directs an order believes that order is incorrect the remedy is to appeal, but, absent a stay, he must comply promptly with the order pending appeal.")).

We hope that you will comply with the Escrow Order without the need for further Court intervention. If we are forced to file a contempt motion, we will seek all appropriate relief, including reimbursement of costs and fees.

May 7, 2026

Regards,

/s/ *Charles Koster*

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EXHIBIT 2

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

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

WHITE & CASE LLP'S FIRST INTERROGATORIES TO MODIVCARE TOPCO, LLC

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, made applicable by Rules 7026, 7033, and 9014 of the Federal Rules of Bankruptcy Procedure, White & Case, LLP ("**White & Case**") serves its First Interrogatories (the "**Interrogatories**" and each, an "**Interrogatory**") to ModivCare TopCo, LLC, as the reorganized debtor (the "**Reorganized Debtor**"). Responses to these Interrogatories must be served on **Charles Koster, White & Case LLP, 609 Main Street, Suite 2900, Houston, TX 77002**, on or before **May 11, 2026**.

DEFINITIONS

For the purposes of these Interrogatories, the following Definitions shall apply:

1. "**Affiliate**" has the meaning ascribed to such term in section 101(2) of the Bankruptcy Code.

2. "**April 30 Hearing**" refers to the hearing in the Bankruptcy Court on April 30, 2026 related to these Chapter 11 Cases.

[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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

3. "**Bankruptcy Code**" means title 11 of the United States Code, as amended.

4. "**Bankruptcy Court**" means the United States Bankruptcy Court for the Southern District of Texas.

5. "**Cash**" shall have the meaning ascribed to it in the Plan.

6. "**Chapter 11 Cases**" means the voluntary chapter 11 cases commenced on the Petition Date by the Debtors in the Bankruptcy Court.

7. "**Communication**" means any oral or written utterance, notation, or statement of any nature whatsoever between or among two or more persons, by or to whomsoever made, and including without limitation, correspondence, documents, conversations, dialogues, discussions, e-mail, interviews, consultations, agreements, and other understandings.

8. "**Concerning**," "regarding," "in connection with," "relating to," and/or "referring to" shall be construed to mean, without limitation, relating to, referring to, describing, evidencing, constituting, discussing, supporting, pertaining to, containing, analyzing, evaluating, studying, recording, showing, memorializing, reporting on, commenting on, mentioning, reviewed in conjunction with, setting forth, contradicting, refuting, considering, or recommending, in whole or in part.

9. "**Confirmation Order**" refers to the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and (II) Denying Motions of the Official Committee of Unsecured Creditors for Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Causes of Action on Behalf of Debtors' Estates* [Dkt. No. 1055].

10. "**Consenting Creditors**" shall have the meaning ascribed to it under the Plan.

11. "**Debtors**" means ModivCare Inc. and its affiliated debtors that filed voluntary chapter 11 petitions under the Bankruptcy Code commencing the Chapter 11 Cases, and any of their respective current or former affiliates, subsidiaries, parent corporations, predecessors, or successors entities; and all of their respective current or former directors, officers, employees, agents, attorneys, advisors, and representatives.

12. "**Document**" includes all things meeting the definition of "documents" or "electronically stored information" set forth in Rule 34 of the Federal Rules of Civil Procedure, as incorporated by Rules 7034 and 9014 of the Federal Rules of Bankruptcy Procedure, as applicable, or meeting the definition of "writing" or "recording" set forth in Rule 1001 of the Federal Rules of Evidence. Any document with any marks such as initials, comments, or notations of any kind is not deemed to be identical to one without such marks and is a separate document within the meaning of this term.

13. "**Effective Date**" has the meaning ascribed to it under the Plan.

14. "**Escrow Order**" refers to the *Order Requiring the Reorganized Debtors to Deposit Funds in Escrow with the Court* [Dkt. No. 1502].

15. "**Including**" means "including, without limitation" or "including, but not limited to."

16. "**Petition Date**" means August 20, 2025.

17. "**Plan**" means the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Dkt. No. 959].

18. "**Professional Fee Account**" refers to the location of the funds that are "set aside" as You referenced at the April 30 Hearing.

19. "**Relate**" and its variants encompass the terms "refer," "reflect," "constitute," "evidence," "in connection with," and "concern" and shall be construed to bring within the scope of the Interrogatory, as applicable, all documents and information that comprise, evidence, constitute, describe, explicitly or implicitly refer to, were reviewed in conjunction with, or were generated as a result of the subject matter of the Interrogatory, as applicable, including, but not limited to, all documents and information that reflect, record, memorialize, discuss, evaluate, consider, review, report, or otherwise evidence the existence of the subject matter of the Interrogatory, as applicable.

20. "**TopCo**" means ModivCare TopCo, LLC and its affiliated reorganized Debtors; any of their respective current or former affiliates, subsidiaries, parent corporations, predecessors, or successors entities; and all of their respective current or former directors, officers, employees, agents, attorneys, advisors, and representatives.

21. "**You**" and "Your" shall refer to TopCo.

INSTRUCTIONS

The preceding Definitions apply to each of these Instructions and for purposes of these Interrogatories, the following Instructions shall be followed:

1. Rule 2004 of the Federal Rules of Bankruptcy Procedure, Federal Rules of Civil Procedure 26, 33, and 34, made applicable by Bankruptcy Rules 7026, 7033, 7034, and 9014 of the Federal Rules of Bankruptcy Procedure, as applicable, is hereby incorporated by reference and applies to each of the Definitions, Instructions and Interrogatories.

2. The word "all" shall also include "each of," and vice versa. The word "any" shall be construed to mean "any and all" where the effect of such construction is to broaden the scope of the Interrogatory.

3. If any responsive information or documents is known to have existed and cannot now be located, or has been destroyed, discarded, or otherwise disposed, set forth a complete statement of the circumstances surrounding such loss, destruction, discarding, or other disposition, including:

a. A description of the information or documents, including the date, a summary of its contents and the identity of its author and the Person(s) to whom it was sent or shown;

b. The last known custodian;

c. Whether the information or document is missing or lost or was destroyed, discarded, or otherwise disposed;

d. The date of loss, destruction, discarding, or other disposition;

e. The reason(s) for destruction, discarding, or other disposition;

f. The Person(s) authorizing or carrying out such destruction, discarding, or other disposition; and

g. The efforts made to locate lost or misplaced information or documents.

4. If there is no information responsive to a specific request, so state in writing.

5. If You know of any information responsive to a particular request but cannot respond, so state, produce the information within Your possession, custody or control on the subject matter sought, and identify each Person whom You believe has information responsive to the Interrogatory.

6. In the event you seek to withhold any document, thing, or information on the basis that it is properly entitled to some privilege or other limitation of discovery, You shall produce as much of the information concerned as to which no claim of privilege or other limitation of

discovery is made. With respect to information, documents or portions of documents for which a claim of privilege or other limitation of discovery is made, You are instructed to provide a list of the information, document(s) and thing(s) for which a privilege or limitation is claimed that (1) identifies the nature of the privilege or limitation; and (2) provides the following information in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged or otherwise protected information: (i) the type of information or document; (ii) the name and capacity of each author and recipient of the information or document; (iii) the general subject matter of the information or document in a manner sufficient to support the privilege or other protection claimed; (iv) the date of the information or document; (v) such other information as is sufficient to identify the information or document for a subpoena *duces tecum*, including, where appropriate, the author(s) of the document, the addressee(s) of the document, and any other recipient(s) shown in the document, and, where not apparent, the relationship of the author(s), addressee(s), and recipient(s) to each other; and (vi) the same information referenced in (i)-(v) above for each enclosure or attachment to each listed document if the enclosure or attachment is also withheld from production.

7. Each Definition, Instruction, and Interrogatory herein shall be construed independently and not with reference to any other Definition, Instruction, or Interrogatory, for the purposes of limitation.

8. If any meaning of any term in any Interrogatory herein is unclear to You, without waiver of the right to seek a full and complete response to the Interrogatory, You shall assume a reasonable meaning, state what the assumed meaning is, and respond to the Interrogatory according to the assumed meaning.

9. In accordance with Rule 33 of the Federal Rules of Civil Procedure, as incorporated by Rules 7033 and 9014 of the Federal Rules of Bankruptcy Procedure, as applicable, objections to any part of these Interrogatories shall be stated in full and with specificity. In the event You interpose an objection to an Interrogatory, You must respond to each part of the Interrogatory which objection is not made or provide testimony or information not objected to, as the case may be.

10. If You cannot respond to any part of the Interrogatories in full, respond to the extent possible, specifying the reason(s) for Your inability to respond to the remainder and stating whatever information or knowledge You have concerning the portion to which You do not respond.

11. Each Interrogatory shall be deemed continuing. You are to promptly supplement Your response if You obtain, generate, or discover additional documents or information, as required by Rule 26 of the Federal Rules of Civil Procedure, as incorporated by Rules 7026 and 9014 of the Federal Rules of Bankruptcy Procedure, as applicable.

12. "Including" shall not be construed to limit the scope of any Interrogatory.

13. Whenever necessary to bring within the scope of an Interrogatory information that might otherwise be construed to be outside its scope:

a. The use of a verb in any tense shall be construed as the use of that verb in all other tenses;

b. The use of a word in its singular form shall be deemed to include within its use the plural form, and vice versa;

c. The use of the masculine form of a noun or pronoun shall include the feminine form, and vice versa; and

d. The use of the conjunctive or disjunctive, respectively, shall be construed as necessary to be inclusive rather than exclusive.

14. Unless another time period is specified, the relevant time period for these Interrogatories is from December 15, 2025 to the date that you respond to these Interrogatories.

INTERROGATORIES

1. Identify with respect to the details of the Professional Fee Account: (i) the date the Professional Fee Account was established; (ii) the nature of the Professional Fee Account (i.e., whether the Professional Fee Account is an escrow account, a controlled account, or another type of account); (iii) the institution(s) where the Professional Fee Account is maintained and, if that institution is different than as of the Effective Date, any predecessor institution where the Professional Fee Account has been maintained; (iv) to the extent any funds were transferred from the Professional Fee Account, the date(s) and recipient(s) of any such transfers; (v) all parties intended to be paid from funds in the Professional Fee Account; (vi) each person or entity authorized to direct the release of, or to effectuate the withdraw of, funds from the Professional Fee Account; and (vii) all parties (other than TopCo) identified in response to this Interrogatory that are employed with or otherwise affiliated with, or that have been employed by or affiliated with, any of the Consenting Creditors or their affiliated funds.

2. Identify the escrow agent for the Professional Fee Account, if any.

3. Confirm whether the Professional Fee Account was established as provided in Article II, Section 2.5 of the Plan and funded in full in Cash prior to the Effective Date and, if not, whether You obtained a waiver of this condition precedent under Article IX of the Plan.

4. Identify the Professional Fee Account balance as of the following dates: (i) the Effective Date; (ii) March 6, 2026; (iii) April 6, 2026; (iv) April 30, 2026; and (v) May 8, 2026.

5. Identify the aggregate amount of unpaid claims covered by the Professional Fee Account as of May 8, 2026 and the entities that hold any such unpaid claims.

6. Identify the amount of funds in the Professional Fee Account reserved to pay any White & Case approved claim.

7. Identify the date You first contacted the Bankruptcy Court clerk's office about the Escrow Order.

8. Describe in detail the Communications You had with the Bankruptcy Court clerk's office, including Communications regarding whether the Escrow Order contained any defects or whether the Bankruptcy Court would reject Your attempt to transfer funds to the Bankruptcy Court's registry.

9. Describe the "deficiency" You were referring to at the April 30 Hearing.

[*Remainder of Page Intentionally Left Blank*]

Dated: May 8, 2026
Houston, Texas

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-and-

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EXHIBIT 3

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

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

WHITE & CASE LLP'S FIRST REQUESTS FOR PRODUCTION TO MODIVCARE TOPCO, LLC

Pursuant to Rules 26(b) and 34 of the Federal Rules of Civil Procedure, made applicable by Rules 7026, 7034, and 9014 of the Federal Rules of Bankruptcy Procedure, White & Case LLP ("**White & Case**") serves its First Requests for Production (the "**Requests**" and each, a "**Request**") to ModivCare TopCo, LLC, as the reorganized debtor (the "**Reorganized Debtor**"). Responses to these Requests must be served on **Charles Koster, White & Case LLP, 609 Main Street, Suite 2900, Houston, TX 77002**, on or before **May 11, 2026**.

DEFINITIONS

For the purposes of these Requests, the following Definitions shall apply:

1. "**Affiliate**" has the meaning ascribed to such term in section 101(2) of the Bankruptcy Code.

2. "**April 30 Hearing**" refers to the hearing in the Bankruptcy Court on April 30, 2026 related to these Chapter 11 Cases.

[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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

3. "**Bankruptcy Code**" means chapter 11 of title 11 of the United States Code, as amended.

4. "**Bankruptcy Court**" means the United States Bankruptcy Court for the Southern District of Texas.

5. "**Chapter 11 Cases**" means the voluntary chapter 11 cases commenced on the Petition Date by the Debtors in the Bankruptcy Court.

6. "**Communication**" means any oral or written utterance, notation, or statement of any nature whatsoever between or among two or more persons, by or to whomsoever made, and including without limitation, correspondence, documents, conversations, dialogues, discussions, e-mail, interviews, consultations, agreements, and other understandings.

7. "**Concerning**," "regarding," "in connection with," "relating to," and/or "referring to" shall be construed to mean, without limitation, relating to, referring to, describing, evidencing, constituting, discussing, supporting, pertaining to, containing, analyzing, evaluating, studying, recording, showing, memorializing, reporting on, commenting on, mentioning, reviewed in conjunction with, setting forth, contradicting, refuting, considering, or recommending, in whole or in part.

8. "**Confirmation Order**" refers to the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and (II) Denying Motions of the Official Committee of Unsecured Creditors for Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Causes of Action on Behalf of Debtors' Estates* [Dkt. No. 1055].

9. "**Debtors**" means ModivCare Inc. and its affiliated debtors that filed voluntary chapter 11 petitions under the Bankruptcy Code commencing the Chapter 11 Cases, and any of

their respective current or former affiliates, subsidiaries, parent corporations, predecessors, or successors entities; and all of their respective current or former directors, officers, employees, agents, attorneys, advisors, and representatives.

10. "**Document**" includes all things meeting the definition of "documents" or "electronically stored information" set forth in Rule 34 of the Federal Rules of Civil Procedure, as incorporated by Rules 7034 and 9014 of the Federal Rules of Bankruptcy Procedure, as applicable, or meeting the definition of "writing" or "recording" set forth in Rule 1001 of the Federal Rules of Evidence. Any document with any marks such as initials, comments, or notations of any kind is not deemed to be identical to one without such marks and is a separate document within the meaning of this term.

11. "**Effective Date**" has the meaning ascribed to it under the Plan.

12. "**Escrow Order**" refers to the *Order Requiring the Reorganized Debtors to Deposit Funds in Escrow with the Court* [Dkt. No. 1502].

13. "**Including**" means "including, without limitation" or "including, but not limited to."

14. "**Petition Date**" means August 20, 2025.

15. "**Plan**" means the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Dkt. No. 959].

16. "**Professional Fee Account**" refers to the location of the funds that are "set aside" as You referenced at the April 30 Hearing.

17. "**Relate**" and its variants encompass the terms "refer," "reflect," "constitute," "evidence," "in connection with," and "concern" and shall be construed to bring within the scope of the Request, as applicable, all documents and information that comprise, evidence, constitute,

describe, explicitly or implicitly refer to, were reviewed in conjunction with, or were generated as a result of the subject matter of the Request, as applicable, including, but not limited to, all documents and information that reflect, record, memorialize, discuss, evaluate, consider, review, report, or otherwise evidence the existence of the subject matter of the Request, as applicable.

18. "**TopCo**" means ModivCare TopCo, LLC and its affiliated reorganized Debtors; any of their respective current or former affiliates, subsidiaries, parent corporations, predecessors, or successors entities; and all of their respective current or former directors, officers, employees, agents, attorneys, advisors, and representatives.

19. "**You**" and "Your" shall refer to TopCo.

INSTRUCTIONS

The preceding Definitions apply to each of these Instructions and for purposes of these Requests, the following instructions shall be followed:

1. Each and every reference to any person, without any limitation, (a) shall be deemed to include that person's agents, attorneys, and any other person who acted on that person's behalf; and (b) with respect to fictitious persons, shall be deemed to include each and all of its affiliates, divisions, predecessors and successors, and with respect to each of such entities, its officers, directors, shareholders, employees, members, partners, limited partners, representatives, agents, accountants, attorneys, and any other person who acted on its behalf.

2. You are to interpret each word, term, and phrase to have the broadest meaning permitted under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure. References to the singular shall include the plural and references to the plural shall include the singular; the conjunctive shall include the disjunctive and the disjunctive shall include the conjunctive; and the present tense shall include the past tense and the past tense shall include the present tense.

3. Terms not otherwise defined shall have their ordinary and plain meaning, including within the context of the Federal Rules of Civil and Bankruptcy Procedure and in accordance with the general accepted meaning accorded such words and phrases in everyday use in the English language.

4. These Requests call for the production of all responsive Documents in Your possession, custody, or control that are available to You from any source, wherever situated, including any of Your present or former officers, directors, members, employees, agents, representatives, attorneys, or financial advisors. If any requested Document was but no longer is in Your control, state the disposition of each such Document.

5. Pursuant to Federal Rules of Bankruptcy Procedure 7026 and Federal Rule of Civil Procedure 26(e), these Requests shall be deemed continuing in nature so as to require You to file supplementary responses if You obtain new or different information up to and including the time of trial or any hearing or submission of this matter.

6. All Requests shall be deemed to include requests for Documents in their entirety, including any and all transmittal sheets, cover letters, cover e-mails, enclosures, or any other annexes or attachments to the Documents. You are to produce the original and all non-identical copies, including all drafts, of each Document requested. If You are not able to produce the original of any Document, You are to produce the best available copy and all non-identical copies, including drafts.

7. You are instructed to produce Documents either as they are kept in the usual course of business or organized and labeled to respond to the relevant Request.

8. The scope of Your search for electronic data that is responsive to any Request shall include all forms of electronic data collection, preservations, transmission, communication and

storage, including but not limited to all data generated and maintained in the ordinary course of business stored by You or any third parties on or in:

a. local and network computers and storage devices;

b. distributed, removable, or portable data, *i.e.*, information which resides on portable media and non-local devices, including home computers, laptop computers, magnetic or floppy discs, CD-ROMs, DVDs, solid-state and flash memory drives, cloud storage or other internet repositories (including e-mail hosted by web services such as Gmail), and handheld storage devices such as smart phones, tablets, and iPads;

c. text messaging systems, including iMessage and SMS;

d. voicemail and e-mail systems, alternative communication and messaging systems (including but not limited to instant messaging, Bloomberg chat, Telegram, WhatsApp, Facebook Messenger, or Slack), file and print servers, and fax servers;

e. legacy data, *i.e.*, retained data that has been created or stored by the use of software or hardware that has been rendered outmoded or obsolete; and

f. metadata, *i.e.*, information regarding a particular data set, which describes how, when and by whom it was collected, created, accessed, and modified and how it is formatted.

9. All Documents and Communications should be Bates labeled and should be produced in single page TIFF images (except that excel spreadsheets and other such file types that include logical formulae or files that, when converted to image format, take on an appearance noticeable different from the one the running-native file took when viewed on a computer screen, should be produced in native, with a "nativelink" file) with extracted text or OCR at the document level and with the following load files: LEP, OPT, and DAT. TIFF images should be 300 DPI Group IV compressed TIFF images. The load files should be provided as delimited load files. All metadata should be provided, including the following: BEGDOC, ENDDOC, BEGATTACH, ENDATTACH, Page Count, Author, To, CC, BCC, Custodian, Date Sent, Time Sent, Subject, File Name, Date Last Modified, MD5Hash and NATIVELINK (link to the native on media if

applicable).

10. All Microsoft Excel files (or other electronic spreadsheet files), audio and video files, and other files that are not able to be rendered as images shall be produced in their native format, unless redacted, with a corresponding native file path link in the DAT load file and a single-page placeholder bates numbered TIFF image.

11. Where an e-mail has an attachment, each attachment file should be produced immediately following the parent e-mail to which it was attached, in the sequential order which it appears in the native file.

12. The selection of Documents from files and other sources and the numbering of such Documents shall be performed in such a manner as to ensure that the source of each Document may be determined, if necessary, including providing the accompanying metadata or other data which would allow the source of the Document to be identified.

13. If You do not have any Documents responsive to a particular Request, so state. If after exercising due diligence to secure them, You cannot provide some or any of the requested Documents, so state and provide all Documents to the extent possible, specifying the reason for Your inability to produce the remainder of the Documents, and stating whatever information or knowledge You have concerning each Document not produced.

14. If You object to any Request set forth herein, state the specific grounds upon which You object and produce all Documents responsive to the Request about which there is no objection.

15. To the extent You contend You are entitled to withhold from production any Document responsive to any Request set forth herein based on the assertion of attorney-client privilege, the attorney work-product doctrine or any other privilege, You should provide the following information, or any alternative information to which the parties may otherwise agree,

with respect to such Document:

a. the date of the Document;

b. the title of the Document;

c. the name of its author(s) or preparer(s) and an identification by employer and title of each such person;

d. the name of each person who was sent or furnished with, received, viewed, or has custody of the Document or a copy thereof together with an identification by employer and title of each such person;

e. the Request to which the Document relates;

f. the title and description of the Document sufficient to identify it without revealing the information for which privilege is claimed;

g. the claim of privilege under which it is withheld; and

h. a description of the subject matter of the Document in sufficient detail to support Your contention that the Document is privileged.

16. If a portion of an otherwise responsive Document contains information subject to a claim privilege, those portions of the Document subject to the claim of privilege shall be redacted from the Document and the rest of the Document shall be produced, consistent with the terms set forth elsewhere herein.

17. If any meaning of any term in any Request herein is unclear to You, without waiver of the right to seek a full and complete response to the Request, You shall assume a reasonable meaning, state what the assumed meaning is to ensure any limitation is revealed, and produce Documents pursuant to the Request according to the assumed meaning.

18. The time frame applicable to these Requests is from December 15, 2025 to the present unless otherwise stated.

DOCUMENTS REQUESTED

1. All statements for the Professional Fee Account.

2. The executed escrow agreement related to the Professional Fee Account, if any and any amendments thereto.

3. All waivers obtained related to Your obligations with respect to (i) the Professional Fee Account; and (ii) any Professional Escrow Account, as that term is defined in the Plan, including, to the condition precedent to the Effective Date to fund the Professional Fee Account in full in Cash, as provided in Article IX, section 9.1 (ix) of the Plan.

[*Remainder of Page Intentionally Left Blank*]

Dated: May 8, 2026
Houston, Texas

/s/ Charles R. Koster

WHITE & CASE LLP
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Counsel to the Official Committee of Unsecured Creditors

WITNESS AND EXHIBIT LIST

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

U.S. Chief Bankruptcy Judge: Rodriguez

Main Case No:	25-90309
Name of Debtor:	ModivCare Inc.
Adversary Case No:	
Style of Adversary:	

Does this amend or supplement a previously filed Witness & Exhibit List? If so, state the date and CM/ECF No. of such previous filing.

Yes	No

Date	CM/ECF No.

Hearing/Trial Date:	May 20, 2026
Hearing Time:	8:30am
Party's Name:	ModivCare Topco, LLC
Attorney's Name:	Johnie Patterson and Miriam Goott
Attorney's Phone:	713-956-5577

Nature of Proceeding(s):

CM/ECF No.	Matter
1518	*Motion For Stay Pending Appeal*

WITNESS LIST

Lay Witnesses:	Kenneth Shepard
Expert Witnesses:	

REBUTTAL/ IMPEACHMENT WITNESSES	
Lay Witnesses:	
Expert Witnesses:	

		FOR COURT USE ONLY		
EX. NO.	**DESCRIPTION**	**OFFERED**	**OBJECTION**	**DISPOSITION**
1.	Confirmation Order			
2.	Docket 25-90309			
3.	White & Case Final Fee App			
4.	AlixPartners Final Fee App			
5.	Objection To White & Case Final Fee App			
6.	Objection To AlixPartners Final Fee App			
7.	Order Requiring Escrow			
8.	Motion To Reconsider			
9.	Escrow Agreement			
10.	Escrow Statement			
11.				
12.				
REBUTTAL/IMPEACHMENT EXHIBITS				
1.				
2.				
3.				
4.				
5.				
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10.				

United States Bankruptcy Court
Southern District of Texas
ENTERED
December 15, 2025
Nathan Ochsner, Clerk

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)
Debtors.[1]	:	(Jointly Administered)

ORDER (I) CONFIRMING SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF 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

Upon the filing by ModivCare Inc. and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "***Debtors***"), of the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates,* dated as of December 5, 2025 [Docket No. 959] (as amended, modified, or supplemented from time to time in accordance with its terms, the "***Plan***"),[2] a copy of which is attached hereto as **Exhibit A**; and this court (this "***Court***") having previously approved the *Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 550], dated as of October 16, 2025 (as amended, modified, or supplemented from time to time in accordance with the Solicitation Procedures Order (as defined below), the "***Disclosure Statement***") and procedures governing the solicitation of acceptances and

[1] A complete list of each of the Debtors in 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.'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.

[2] Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan.

rejections of the Plan, in each case pursuant to the *Amended 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 Forms 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. 552] (the "***Solicitation Procedures Order***"); and the Debtors having served the Solicitation Packages and the Notices of Non-Voting Status and Release Opt-Out Forms (each as defined in the Solicitation Procedures Order), which included a copy of the Disclosure Statement, on the Holders of Claims and Existing Parent Equity Interests, pursuant to the Solicitation Procedures Order, as set forth in the *Certificate of Service of Solicitation Materials* [Docket No. 801] and the *Supplemental Certificate of Service* [Docket No. 816] (collectively, the "***Solicitation Affidavits***"); and the Debtors having filed the *Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 725] (as amended, supplemented, or modified from time to time, the "***First Plan Supplement***") on November 14, 2025, the *Notice of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 802] (as amended, supplemented, or modified from time to time the "***Second Plan Supplement***") on November 24, 2025, the *Notice of Filing of Third Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 961] (as amended, supplemented, or modified from time to time the "***Third Plan Supplement***") on December 5, 2025, and the *Notice of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1030]

(as amended, supplemented, or modified from time to time the "***Fourth Plan Supplement***" and together with the First Plan Supplement, the Second Plan Supplement, and the Third Plan Supplement, the "***Plan Supplement***") on December 11, 2025; and the Court having considered the *Debtors' Omnibus Brief (A) in Support of Plan Confirmation and (B) Objecting to Committee's Motions for Standing to Pursue Claims and Lien Challenges* [Docket No. 921] (the "***Confirmation Memorandum***"), the *Declaration of Daniel B. Silvers, Investigating Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 687] (together with the *Supplement Declaration of Daniel B. Silvers, Investigation Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtors Affiliates* [Docket No 803], the "***Silvers Declaration***"), and the *Declaration of Chad J. Shandler in Support of Confirmation of the Debtors' Proposed Plan of Reorganization* [Docket No. 953], and the *Declaration of Zul Jamal in Support of Confirmation of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 952]; and the court having considered the *Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* [Docket No. 728], the *Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims, Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* [Docket No. 729], and the *Official Committee of Unsecured Creditors First Supplement to Lien Challenge Motion* [Docket No. 806] (collectively, the "***Standing Motions***"); and the Court having considered the record in the Chapter 11 Cases, the creditor support for the Plan as evidenced on the record and in the

Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates [Docket No. 916] filed on December 4, 2025, the *Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 993] filed on December 9, 2025, and the *Second Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1018] filed on December 10, 2025, the compromises and settlements embodied in and contemplated by the Plan, the briefs and arguments regarding Confirmation of the Plan and the Standing Motions, the hearing on Confirmation of the Plan and the Standing Motions having commenced on December 8, 2025 (the "***Confirmation Hearing***"), and the evidence adduced at the Confirmation Hearing regarding Confirmation of the Plan and the Standing Motions; and after due deliberation:

IT IS HEREBY FOUND AND DETERMINED THAT:

A. The findings and conclusions set forth in this order (this "***Confirmation Order***") and in the record of the Confirmation Hearing constitute this Court's findings of fact and conclusions of law pursuant to Rule 52 of the Federal Rules of Civil Procedure, as made applicable herein by Bankruptcy Rules 7052 and 9014. To the extent any of the following findings of fact constitute conclusions of law, they are adopted as such. To the extent any of the following conclusions of law constitute findings of fact, they are adopted as such. The Debtors are eligible to be debtors under section 109 of the Bankruptcy Code and, pursuant to the Local Bankruptcy Rules, the Debtors consent to entry of a final order by the Court in accordance with the terms set forth herein to the extent that it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The Debtors are proper plan proponents under section 1121(a) of the Bankruptcy Code.

B. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the *Order of Reference to Bankruptcy Judges* from the United States District Court for the Southern District of Texas, dated May 24, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and this Court has jurisdiction to enter a final order with respect thereto.

C. Each of the Debtors has met the burden of proving that the Plan satisfies the requirements of sections 1129(a) and 1129(b) of the Bankruptcy Code by a preponderance of the evidence.

D. The Plan was solicited in good faith and in compliance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. As is evidenced by the Solicitation Affidavits, the transmittal and service of the Plan, the Disclosure Statement, the Solicitation Packages, and the Notices of Non-Voting Status and Release Opt-Out Forms complied with the Solicitation Procedures Order and was adequate and sufficient under the circumstances. All parties required to be given notice of the Confirmation Hearing (including the deadline for filing and serving objections to confirmation of the Plan) have been given due, proper, timely, and adequate notice in accordance with the Solicitation Procedures Order and in compliance with the Bankruptcy Code, the Bankruptcy Rules, and applicable non-bankruptcy law, and such parties have had a full and fair opportunity to appear and be heard with respect thereto. No additional or further notice is required under the circumstances.

E. The Plan has been proposed in good faith and not by any means forbidden by law. In so finding, this Court has considered the totality of the circumstances of the Chapter 11 Cases, and found that all constituencies acted in good faith. The Plan is the result of extensive, good faith,

arm's length negotiations among the Debtors and their principal constituencies.

F. With respect to each Debtor, the votes to accept or reject the Plan have been solicited and tabulated fairly, in good faith, and in a manner consistent with the Bankruptcy Code, the Bankruptcy Rules and the Solicitation Procedures Order.

G. The Holders of First Lien Claims (Class 3) and the Holders of General Unsecured Claims (Class 4) (each a "***Voting Accepting Class***" and together the "***Voting Accepting Classes***") have voted to accept the Plan in accordance with section 1126(c) of the Bankruptcy Code.

H. Each Voting Accepting Class is impaired within the meaning of section 1124 of the Bankruptcy Code. Because at least one impaired Class has voted to accept the Plan without including any acceptance of the Plan by any insider, section 1129(a)(10) of the Bankruptcy Code is satisfied.

I. The Plan satisfies section 1129(a)(7) of the Bankruptcy Code. The liquidation analysis set forth in Exhibit C to the Disclosure Statement and other evidence proffered or adduced at the Confirmation Hearing establishes that each Holder of a Claim or Interest in an Impaired Class either has accepted the Plan or will receive or retain under the Plan, on account of such Allowed Claim or Interest, property of a value, as of the Effective Date of the Plan, that is not less than the amount that it would receive if the Debtors were liquidated under Chapter 7 of the Bankruptcy Code on such date.

J. Holders of Subordinated Unsecured Notes Claims (Class 5) have voted to reject the Plan in accordance with section 1126(c) of the Bankruptcy Code. The Holders of Subordinated Claims (Class 7) and the Existing Parent Equity Interests (Class 9) are deemed to have rejected the Plan (Class 5, Class 7, and Class 9, each a "***Rejecting Class***" and, collectively, the "***Rejecting Classes***"). The Court finds, based on the record of the Chapter 11 Cases and the evidence

presented and adduced at the Confirmation Hearing, that the Plan does not discriminate unfairly and is fair and equitable with respect to the Rejecting Classes, as required by sections 1129(b)(1) and (b)(2) of the Bankruptcy Code, because (i) no Holder of any Claim or Interest that is junior to the interests represented by the Rejecting Classes will receive or retain any property under the Plan on account of such junior Claim or Interest and (ii) no Holder of a Claim in a Class senior to the Rejecting Classes is receiving more than 100% recovery on account of its Claim. Thus, the Plan may be confirmed notwithstanding the rejection of the Plan by the Rejecting Class.

K. The classification of Claims and Interests under the Plan is proper and satisfies the requirements of the Bankruptcy Code. Pursuant to sections 1122(a) and 1123(a)(1) of the Bankruptcy Code, Article III of the Plan provides for the separate classification of Claims and Interests into nine Classes, based on differences in the legal nature or priority of such Claims and Interests (other than Administrative Claims (including Professional Fee Claims), DIP Claims, Priority Tax Claims, and statutory fees, which are addressed in Article II of the Plan and which have not been classified in accordance with section 1123(a)(1) of the Bankruptcy Code). Valid business, factual, and legal reasons exist for the separate classification of the various Classes of Claims and Interests created under the Plan, the classifications were not done for any improper purpose, and the creation of such Classes does not unfairly discriminate between or among Holders of Claims or Interests. As required by section 1122(a) of the Bankruptcy Code, each Class of Claims and Interests contains only Claims or Interests that are substantially similar to the other Claims or Interests within that Class.

L. The Court finds, based on the record of the Chapter 11 Cases and the evidence presented and adduced at the Confirmation Hearing that the Debtor Release provided pursuant to Section 10.6(a) of the Plan represents a sound exercise of the Debtors' business judgment, was

negotiated in good faith and at arms' length, and formed an essential part of the agreement among the parties participating in the negotiation and formulation of the Plan. In addition, for the reasons set forth in the Confirmation Memorandum and the evidence adduced at the Confirmation Hearing, the Third-Party Release provided pursuant to Section 10.6(b) of the Plan is consensual and binding on all creditors to the extent set forth therein and herein. All impaired creditors were given an opportunity to "opt out" of such release in accordance with the Plan and the Solicitation Procedures Order. Moreover, the Released Parties played an integral role in the formulation of the Plan, have made significant contributions that are essential to the Plan's success, and have expended significant time and resources analyzing and negotiating the Plan and the issues presented by the Debtors' prepetition capital structure. Accordingly, the Court finds, based on the record of the Chapter 11 Cases and the evidence presented and adduced at the Confirmation Hearing, that the releases provided pursuant to Section 10.6 of the Plan are: (i) in exchange for the good and valuable consideration provided by the Released Parties; (ii) a good faith settlement and compromise of the Claims and Causes of Action released by the Plan; (ii) in the best interests of the Debtors and their Estates; (iv) fair, equitable, and reasonable under the circumstances; and (v) given and made after due notice and opportunity for hearing.

M. The exculpation provided by Section 10.7 of the Plan for the benefit of the Exculpated Parties (the "***Exculpation***") is appropriate under applicable law, including *In re Highland Capital Mgmt.*, L.P., 48 F.4th 419 (5th Cir. 2022), because it is an integral part of a Plan, supported by the evidence in the record at the Confirmation Hearing, proposed in good faith, formulated following extensive good faith, arm's-length negotiations with key constituents, and appropriately limited in scope to the parties that served as fiduciaries in the Chapter 11 Cases. The Exculpation, including its carve-out for willful misconduct, actual fraud, and gross negligence, is

consistent with the applicable law and established practice in this jurisdiction and others.

N. The Court finds that the relief requested by the Committee in the Standing Motions should be denied on the merits for the reasons more fully set forth by the Court on the record at the Confirmation Hearing.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

I. Confirmation of the Plan

1. The Plan is confirmed pursuant to section 1129 of the Bankruptcy Code.

2. Any and all objections to Confirmation of the Plan that have not been resolved, withdrawn, waived, or settled and all reservations of rights included therein, are overruled on the merits and for the reasons set forth on the record at the Confirmation Hearing. Notwithstanding the foregoing, the rights and objections of any party that properly Filed and served an objection to the assumption, or assumption and assignment, of its Executory Contract or Unexpired Lease, including (without limitation) an objection regarding the amount of its proposed Cure Claim (such amount, as set forth on the applicable Assumption Notice (as defined in the Solicitation Procedures Order), the "***Proposed Cure***") or the applicable Debtor's ability to provide adequate assurance of future performance are reserved. Any dispute (an "***Assumption Dispute***") regarding the assumption, or assumption and assignment, of the applicable Executory Contract or Unexpired Lease, including (without limitation), the Proposed Cure or the applicable Debtor's ability to provide adequate assurance of future performance, shall be resolved in accordance with paragraph 36 of this Confirmation Order.

3. The Debtors and the Reorganized Debtors (as applicable) are authorized to take all actions required under the Plan and to effectuate the Plan and the transactions contemplated therein. The terms of the Plan, the Plan Supplement, the Definitive Documents, and the exhibits and schedules thereto are incorporated by reference into, and are an integral part of, this

Confirmation Order. The terms of the Plan, the documents contained in the Plan Supplement, Definitive Documents, all exhibits thereto, and all other relevant and necessary documents, shall be effective and binding as of the Effective Date. The failure to include or reference any particular provision of the Plan or Plan Supplement in this Confirmation Order shall not diminish or impair the effectiveness of such provision, it being the intent of the Court that the Plan be confirmed in its entirety and such provisions shall have the same binding effect, enforceability, and legality as every other provision of the Plan. Each term and provision of the Plan, as it may have been altered or interpreted by the Court, is valid and enforceable pursuant to its terms.

4. The terms of the Plan and all transactions contemplated by the Plan, shall be effective and binding as of the Effective Date. Subject to the terms of the Plan, the Debtors reserve the right to alter, amend, update or modify the Plan Supplement, the Definitive Documents, and any documents contained therein up until, and through, the Effective Date. The failure to specifically include or refer to any particular article, section, or provision of the Plan, the Plan Supplement, the Definitive Documents, or any related document in this Confirmation Order does not diminish or impair the effectiveness or enforceability of such article, section, or provision, which are approved in their entirety.

5. This Confirmation Order shall constitute all approvals and consents required, if any, by the laws, rules or regulations of any state or any other governmental authority with respect to the implementation or consummation of the Plan and any other acts that may be necessary or appropriate for the implementation or consummation of the Plan. Pursuant to the applicable provisions of the corporate and limited liability company laws of the states where the Debtors are organized, other applicable non-bankruptcy law, and section 1142(b) of the Bankruptcy Code, no action of the respective directors or stockholders of the Debtors shall be required to authorize the

Debtors or the Reorganized Debtors, as applicable, to enter into, execute, deliver, file, adopt, amend, restate, consummate, or effectuate, as the case may be, the Plan and any Definitive Documents, contract, instrument, or other document to be executed, delivered, adopted, or amended in connection with implementation of the Plan.

6. Subject to payment of any applicable filing fees under applicable non-bankruptcy law, each federal, state, commonwealth, local, foreign or other governmental agency shall accept for filing and/or recording any and all documents, mortgages and instruments necessary or appropriate to effectuate, implement or consummate the transactions contemplated by the Plan and this Confirmation Order. To the fullest extent permitted by section 1146(a) of the Bankruptcy Code, any transfers of property pursuant to, in contemplation of, or in connection with the Plan shall not be subject to any stamp tax, document recording tax, conveyance fee, intangibles, or similar tax, mortgage tax, real estate transfer tax, mortgage recording tax, sales or use tax, Uniform Commercial Code filing or recording fee, regulatory filing or recording fee, or other similar tax or governmental assessment in the United States, and this Confirmation Order hereby directs the appropriate state or local governmental officials or agents to forgo the collection of any such tax or governmental assessment and to accept for filing and recordation instruments or other documents pursuant to such transfers of property without the payment of any such tax or governmental assessment. Such exemption specifically applies, without limitation, to (a) the creation, modification, consolidation, or recording of any mortgage, deed of trust, Lien, or other security interest, or the securing of additional indebtedness by such or other means, (b) the making, assignment, or recording of any lease or sublease, (c) any of the Restructuring Transactions authorized by the Plan, and (d) the making or delivery of any deed or other instrument of transfer under, in furtherance of, or in connection with the Plan, including: (i) any merger agreements;

(ii) agreements of consolidation, restructuring, disposition, liquidation, or dissolution; (iii) bills of sale; or (iv) assignments executed in connection with any of the Restructuring Transactions.

7. The compromises and settlements set forth in the Plan are approved pursuant to Bankruptcy Rule 9019.

8. The assumption, on and as of the Effective Date, by the Debtors of all (a) existing Employee Plans and (b) all insurance policies (including, without limitation the D&O Policies) to which any Debtor is a party as of the Effective Date, as set forth in the Plan, is hereby approved.

9. For the avoidance of doubt, pursuant to Bankruptcy Rule 3020(c)(1), the following provisions in the Plan are hereby approved in full and will be effective immediately on the Effective Date without further order or action by this Court, any of the parties to such release, or any other Person or Entity: (a) Releases by the Debtors (Section 10.6(a)); (b) Releases by Holders of Claims and Interests (Section 10.6(b)); (c) Exculpation (Section 10.7); and (d) Permanent Injunction (Section 10.5).

10. The amendments and modifications to the solicitation version of the *First Amended Joint Chapter 11 Plan of ModivCare Inc. and its Debtor Affiliates* [Docket No. 465] since the filing thereof, including as reflected and incorporated into the Plan, are shown in the redline filed with the Court on December 5, 2025 [Docket No. 960, Exhibit A]. Adequate and sufficient notice of such amendments and modifications (collectively, the "***Subsequent Plan Modifications***") has been given. The Subsequent Plan Modifications do not individually, or in the aggregate, materially or adversely affect or change the treatment of any Claim against, or interest in, any of the Debtors. Accordingly**,** no other or further notice, disclosure under section 1125 of the Bankruptcy Code, nor resolicitation of votes under section 1126 of the Bankruptcy Code, is or shall be required and such Subsequent Plan Modifications are approved in full in accordance with section 1127(a) of the

Bankruptcy Code and Bankruptcy Rule 3019(a). The Plan, as modified by the Subsequent Plan Modifications, is deemed accepted by all creditors who have previously accepted the Plan and the Subsequent Plan Modifications do not require that Holders of Claims be afforded an opportunity to change previously cast acceptances or rejections of the Plan. All rights of the Debtors or the Reorganized Debtors to modify the Plan and the documents that comprise the Plan Supplement, in accordance with the terms thereof, are reserved.

11. Pursuant to section 1141 of the Bankruptcy Code and the other applicable provisions of the Bankruptcy Code, effective as of the Effective Date, the provisions of the Plan shall be binding on (a) the Debtors and the Reorganized Debtors, (b) all Holders of Claims against, and Interests in, the Debtors, whether or not Impaired under the Plan and whether or not such Holders have accepted or rejected the Plan or affirmatively voted to reject the Plan, (c) each Person or Entity receiving, retaining or otherwise acquiring property under the Plan, and (d) any non-Debtor party to an Executory Contract or Unexpired Lease with the Debtors.

12. The applicable Debtors or Reorganized Debtors are authorized to consummate the Restructuring Transactions described in or contemplated by Section 5.1 of the Plan, subject to the terms and conditions set forth therein, in this Confirmation Order and in the Definitive Documents.

13. The existing directors of ModivCare in their capacities as such will be deemed to have resigned as directors of ModivCare on and as of the Effective Date, in each case without further notice to or order of the Bankruptcy Court, act or action under applicable law, regulation, order, or rule or the vote, consent, authorization or approval of any Person or Entity.

14. Except as otherwise provided in the Plan, the Exit Facilities Documents, or in any contract, instrument, release, or other agreement or document created pursuant to the Plan, on the Effective Date and concurrently with the applicable distributions made pursuant to the Plan and,

in the case of a Secured Claim, satisfaction in full of the portion of the Secured Claim that is Allowed as of the Effective Date, all mortgages, deeds of trust, Liens, pledges, or other security interests against any asset or property of the Debtors shall be fully released and discharged, and all of the right, title, and interest of any holder of such mortgages, deeds of trust, Liens, pledges, or other security interests shall revert to the Reorganized Debtors and their successors and assigns, free and clear of such mortgages, deeds of trust, Liens, pledges, or other security interests and without further notice to or order of this Court, act or action under applicable law, regulation, order, or rule or the vote, consent, authorization or approval of any Person or Entity.

15. The Debtors shall cause to be served a notice of the entry of this Confirmation Order and occurrence of the Effective Date, substantially in the form attached hereto as **Exhibit B** (the "***Effective Date Notice***"), upon (a) all parties listed in the creditor matrix maintained by the Solicitation Agent (as defined in the Solicitation Procedures Order) and (b) such additional persons and entities as deemed appropriate by the Debtors, no later than five (5) business days after the Effective Date. The Debtors shall cause a copy of the Effective Date Notice to be published in *The New York Times* or a similar publication of national circulation within seven (7) business days after the Effective Date.

II. Dissolution of the Committee

16. On the Effective Date, the current and former members of the Committee, and their respective officers, employees, attorneys, financial advisors, and other agents, will be released from all further authority, duties, responsibilities and obligations related to, and arising from, and in connection with, the Chapter 11 Cases and the Committee will dissolve; *provided, however*, that following the Effective Date, the Committee will continue in existence and have standing and a right to be heard for the following limited purpose of pursuing the payment in full in Cash of

Professional Fee Claims and filing and prosecuting fee applications, including any final fee applications, Filed pursuant to sections 330 and 331 of the Bankruptcy Code. Following the completion of the Committee's remaining duties set forth above, the Committee will be dissolved, and the retention or employment of the Committee's respective attorneys, accountants and other agents will terminate without further notice to, or action by, any Entity. For the avoidance of doubt, nothing set forth herein shall permit any professional engaged by the Committee or the Debtors to seek payment of an Administrative Claim from either the Debtors' estates or the Reorganized Debtors for (a) any fees incurred in defending any fee applications or (b) otherwise in connection with any objection to such fees or fee applications, in each case, without further order from the Court.

III. The Exit Facilities

17. The Debtors and Reorganized Debtors, as applicable, are hereby authorized to enter into, and take such actions as necessary or desirable to perform under, the Exit Facilities and, in each case, the Exit Facilities Documents, all documents or agreements related thereto, including the payment or reimbursement of any fees, indemnities and expenses under or pursuant to any such documents and agreements in connection therewith. Upon the closing of the Exit Facilities, the lenders under the Exit Facility thereunder shall have valid, binding, perfected and enforceable Liens on the collateral specified in the Exit Facilities Documents with the priority set forth in the Exit Facilities Documents, and subject only to such Liens and security interests as may be permitted under the Exit Facilities Documents, and the Debtors and Reorganized Debtors are hereby authorized to make any and all filings and recordings necessary or desirable in connection with such Liens.

18. The obligations, guarantees, mortgages, pledges, Liens and other security interests granted pursuant to or in connection with the Exit Facilities are granted in good faith, for good and valuable consideration and for legitimate business purposes as an inducement to the lenders under the Exit Facilities to extend credit thereunder and shall be, and hereby are, deemed not to constitute a fraudulent conveyance or fraudulent transfer and shall not otherwise be subject to avoidance or recharacterization.

IV. Administrative Claims Bar Date

19. Except as otherwise provided in the DIP Orders, the *Order Establishing (A) 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. 66], or the Plan, requests for payment of Administrative Claims must be filed with the Court and served on the Debtors or Reorganized Debtors (as the case may be) and the Solicitation Agent within thirty (30) days from the date of service of the Effective Date Notice. Such proof of Administrative Claim must include at a minimum: (a) the name of the applicable Debtor that is purported to be liable for the Administrative Claim and if the Administrative Claim is asserted against more than one Debtor, the exact amount asserted to be owed by each such Debtor; (b) the name of the Holder of the Administrative Claim; (c) the asserted amount of the Administrative Claim; (d) the basis of the Administrative Claim; and (e) supporting documentation for the Administrative Claim; *provided*, *however*, that the foregoing shall not apply to the Holders of Claims arising under section 503(b)(1)(D) of the Bankruptcy Code or the United States Trustee as the Holder of Administrative Claims. **FAILURE TO FILE AND SERVE SUCH PROOF OF ADMINISTRATIVE CLAIM TIMELY AND PROPERLY SHALL RESULT IN SUCH CLAIM BEING FOREVER BARRED AND DISCHARGED**.

V. Resolution of Other Matters.

20. Treatment of ASIC and Applied Surety Bond Agreements.[3] Notwithstanding any other provisions of the Plan, Plan Supplement, this Confirmation Order or any other Order of the Bankruptcy Court in the Chapter 11 Cases, on the Effective Date, any rights and obligations arising under or with respect to: (a) the Surety Bonds; (b) any Surety Bond Indemnity Agreements; (c) any Surety collateral, including, without limitation, cash, letters of credit, and/or the proceeds of any such collateral (the "***Surety Collateral***"); and (d) any Surety agreements governing Surety Collateral (items (a), (b), (c), and (d) collectively, the "***ASIC and Applied Surety Bond Agreements***") shall be deemed reaffirmed and ratified by the applicable Reorganized Debtors and Surety Bond Indemnitors, shall continue in full force and effect, and the rights and obligations thereunder and with respect thereto shall not be altered, modified, discharged, enjoined, impaired or released by the Plan, any Plan Supplement, or this Confirmation Order. For the avoidance of doubt, nothing in the Plan, Plan Supplement or this Confirmation Order or any Order entered in the Chapter 11 Cases, including, without limitation, any exculpation, release, injunction, exclusions and discharge provision contained in Article X of the Plan, shall bar, alter, limit, impair, release, modify or enjoin any rights and obligations of the parties under the ASIC and Applied

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[3] For purposes of this paragraph, these definitions shall be applicable:

"***Applied***" means Applied Surety Underwriters, and/or any of the companies for which Applied Surety Underwriters underwrites surety bonds, including, without limitation, SiriusPoint America Insurance Company.

"***ASIC*** means Atlantic Specialty Insurance Company.

"***Surety***" means each of Applied or ASIC. "***Sureties***" means ASIC and Applied.

"***Surety Bonds***" means those certain surety bonds issued by Surety, prior to and after the Petition Date, on behalf of certain of the Debtors.

"***Surety Bond Indemnitors***" means those certain Debtors party to the ASIC and Applied Surety Bond Agreements.

"***Surety Bond Indemnity Agreements***" means those certain indemnity agreements and/or related agreements, including without limitation, agreement regarding collateral entered into prior to and/or after the Petition Date, in the ordinary course of business, by certain of the Debtors and Surety.

Surety Bond Agreements or applicable law. Surety is deemed to have opted out of any release provisions of the Plan that apply or could be interpreted to apply to Surety. Solely to the extent any of the ASIC and Applied Surety Bond Agreements are deemed to be one or more executory contracts, any such agreements are deemed assumed by the Debtors and the Reorganized Debtors pursuant to section 365 of the Bankruptcy Code effective as of the Effective Date with the consent of the Surety. If on and after the Effective Date any one of the ASIC and Applied Surety Bond Agreements ceases to be in effect solely as a result of a determination by a court of competent jurisdiction that such agreements are non-assumable under applicable bankruptcy law, any such ASIC and Applied Surety Bond Agreements shall be deemed reinstated or ratified on the terms of such Surety Bond Agreement that existed immediately prior to the Effective Date and the Reorganized Debtors will take reasonable steps to execute such documents as may be necessary to effect the reinstatement of such ASIC and Applied Surety Bond Agreements on such terms that existed immediately prior to the Effective Date. Nothing in the Plan, Plan Supplement, Confirmation Order or any Order entered in the Chapter 11 Cases shall affect in any way the Surety's rights against any non-Debtor, or any non-Debtor's rights against the Surety, including under any ASIC and Applied Surety Bond Agreement.

21. Treatment of Chubb Surety Bond Agreements. Notwithstanding anything to the contrary in the Plan, Restructuring Support Agreement, any other document related to any of the foregoing, or any other order of this Court (including, without limitation, any other provision that purports to be preemptory or supervening, grants an injunction, discharge or release, confers this Court jurisdiction, or requires a party to opt out of any releases) (for purposes of this section, the "***Plan Documents***"), nothing in the Plan Documents shall in any way prime, discharge, impair, modify, subordinate or affect the rights of Westchester Fire Insurance Company, Federal Insurance

Company and/or their past, present or future affiliated sureties (each as surety in its role as an issuer of bonds, individually and collectively referred to herein as "***Chubb Surety***") as to:

(a) surety bonds or similar instruments issued or executed by Chubb Surety on behalf of any of the Debtors and/or non-debtor affiliates (collectively, and together with those bonds or similar instruments in which any of the Reorganized Debtors is becoming the principal, as set forth in paragraph 22(a), below (the "***Chubb Bonds***"), all of the obligations under each and every one of the Chubb Bonds shall hereafter be referred to individually and collectively as the "***Chubb Bonded Obligations***"); *provided*, *however*, that the Chubb Bonds and Chubb Bonded Obligations shall be recognized and enforced consistent with applicable nonbankruptcy law;

(b) any indemnity agreement executed by any Debtor and/or non-debtor affiliates, including but not limited to the Agreement of Indemnity executed by Charter LCI Corporation and LogistiCare, Inc. (now Debtor ModivCare Solutions, LLC) on or about February 6, 2007, and the Agreement of Indemnity executed by Providence Service Corporation (now Debtor ModivCare Inc.) on or about February 21, 2008, as well as an Agreement of Indemnity executed by Debtors ModivCare Solutions, LLC and ModivCare Inc. on or about September 2, 2025, (the "***Indemnity Agreements***");

(c) any funds or instruments the Surety is holding and/or that are being held for or for the benefit of the Surety presently or in the future, including but not limited to cash collateral totaling $7,360,000.00 procured pursuant to certain cash collateral agreements between the Debtors and Chubb Surety (the "***Cash Collateral Agreements***"), whether in trust, as security, or otherwise, including any payments the Surety receives from an indemnitor or proceeds due or to become due to any of the Debtors or their non-debtor affiliates in relation to contracts or obligations for which the Surety has issued or may in the future issue any bond or related instrument, including any Bond; *provided*, *however*, that any use, application, or retention of such funds shall be in accordance with the Cash Collateral Agreements and Indemnity Agreements, and/or as otherwise permitted by applicable nonbankruptcy law;

(d) any rights, remedies and/or defenses Chubb Surety may now or in the future have with respect to any and all Chubb Bonds and/or related instruments issued and/or executed by Chubb Surety on behalf of any of the Debtors and/or their non-Debtor affiliates to the extent set forth in the Chubb Surety Documents (as defined below) and/or otherwise permitted by applicable nonbankruptcy law;

(e) current or future setoff and/or recoupment rights and/or the lien rights and/or trust fund claims of Chubb Surety or any party to whose rights Chubb Surety has or may be subrogated as related to any Chubb Bonded Obligations, and/or any existing or future subrogation or other common law rights of Chubb Surety to the extent set

forth in the Chubb Surety Documents and/or otherwise permitted by applicable nonbankruptcy law; and

(f) any related documents (together with the Chubb Bonds, Indemnity Agreements, and the Cash Collateral Agreements, collectively, the "***Chubb Surety Documents***"), as well as, any and all subrogation rights, all of which are neither affected nor impaired by the Plan Documents.

22. Notwithstanding anything in the Plan Documents to the contrary:

(a) any and all active Chubb Bonds in place as of the Effective Date shall survive the Effective Date and one or more of the Reorganized Debtors ("***Assuming Reorganized Debtor***") shall become the principal on the Chubb Bonds in lieu of the current principal or principals as of the Effective Date;

(b) the Indemnity Agreements, Cash Collateral Agreements and Chubb Bonds shall be assumed by one or more of the Assuming Reorganized Debtors and assigned to the Assuming Reorganized Debtor and, Chubb Surety shall be entitled to reasonable and documented attorneys' fees and costs and, without duplication, any cure amounts, without having to file an administrative claim, request for payment, cure objection, or fee application; *provided*, that (i) any such cure amounts shall be limited to those incurred and payable in accordance with the Chubb Surety Documents and applicable law, (ii) shall be supported by reasonably detailed invoices and documentation, which may be redacted as to privilege, and (iii) any cure amounts that remain outstanding as of the Effective Date shall become the obligation of the Assuming Reorganized Debtor;

(c) on and after the Effective Date, the Assuming Reorganized Debtor shall comply with all obligations of the Debtors relating to the Chubb Bonds under the Indemnity Agreements as if the Reorganized Debtor had executed the Indemnity Agreements;

(d) Chubb Surety may, amend the Chubb Bonds and/or Indemnity Agreements to name the Assuming Reorganized Debtor and/or require the Assuming Reorganized Debtor to execute a new indemnity agreement; *provided*, that any such amendments or new agreements shall be limited to those reasonably necessary to reflect the change in principal and maintain the existing risk profile, and shall not impose materially more onerous terms than existed immediately prior to the Effective Date absent the Assuming Reorganized Debtor's consent; and

(e) Chubb Surety reserves all of its rights to modify, amend, extend, and/or cancel any and all of the active Chubb Bonds as permitted by the Chubb Surety Documents and/or under applicable law; *provided*, that any such action shall be consistent with the terms of the applicable Bond; *provided*, *further*, that Chubb Surety has no obligation to issue or execute any new bonds on behalf of any entity, or to extend, modify, renew or increase the amount of any Chubb Bonds, except as expressly agreed to in writing.

23. Nothing in the Plan Documents, or any documents related to the foregoing, shall prime or otherwise impact: (a) current or future setoff and/or recoupment rights and/or the lien rights and/or trust fund claims of Chubb Surety or any party to whose rights Chubb Surety has or may be subrogated as it relates to Chubb Bonded Obligations and/or (b) any existing or future subrogation or other common law rights of Chubb Surety. For the avoidance of doubt, Section 6.16 of the Plan (Satisfaction of Claims) shall not apply to Chubb Surety. For the avoidance of doubt, Section 8.1(a) of the Plan (assumption of executory contracts on the effective date) shall not apply to Chubb Surety. For the avoidance of doubt, Section 10.5(d) (injunction as to setoff or recoupment) shall not apply to Chubb Surety or its bond beneficiaries. Notwithstanding any other provision in the Plan Documents to the contrary, if a claim or claims is or are asserted against any of the Chubb Bonds, then the Surety shall be granted reasonable access to, and may make copies of, any books and records that may be held by the Debtors and/or the Reorganized Debtors relating to any such claim; *provided*, that such access shall be upon reasonable prior notice, subject to customary confidentiality obligations, and limited to materials reasonably necessary to evaluate, defend, or resolve the specific claim asserted. To the extent the Effective Date does not occur, this paragraph 23 will be of no force and effect, and the parties' rights are reserved; *provided*, that nothing in any other section of this Confirmation Order shall negate any of the rights of Chubb Surety or of any of the obligees under any of the Chubb Bonds.

24. Treatment of the Chubb Insurance Program. Notwithstanding anything to the contrary in the Definitive Documents, Restructuring Support Agreement, any other document related to any of the foregoing, or any other order of the Court (including, without limitation, any other provision that purports to be preemptory or supervening, grants an injunction, discharge or release, confers Court jurisdiction, or requires a party to opt out of any releases):

(a) on the Effective Date, all of the insurance policies which have been issued by ACE American Insurance Company, Federal Insurance Company and any of their respective U.S.-based affiliates and predecessors (together with ESIS, Inc., and solely in their capacities as insurers and third party administrators, the "***Chubb Companies***") to, or which provide coverage to, any of the Debtors (or any of their predecessors) at any time and for any line of coverage (collectively and together with any agreements, documents or instruments related thereto entered into by, or issued for the benefit of, the Chubb Companies, and each as amended, modified or supplemented and including any exhibit or addenda thereto, the "***Chubb Insurance Program***") shall be assumed in their entireties by the applicable Debtors and the Reorganized Debtors pursuant to sections 105 and 365 of the Bankruptcy Code, and shall continue in full force and effect thereafter in accordance with their respective terms and shall survive unimpaired under the Plan;

(b) on and after the Effective Date, the Reorganized Debtors shall become and remain jointly and severally liable in full for all of their and the Debtors' obligations under the Chubb Insurance Program regardless of whether such obligations arise before or after the Effective Date and without the requirement or need for the Chubb Companies to file a Proof of Claim or an Administrative Claim, Cure Claim, object to any cure amount, or file a motion for setoff or recoupment;

(c) nothing (including Article VIII, Sections 8.5 and 8.6 of the Plan or any corresponding paragraphs of this Confirmation Order) shall alter or modify the terms and conditions of the Chubb Insurance Program, and any rights and obligations thereunder shall be determined in accordance with the terms thereof and applicable non-bankruptcy law;

(d) except as set forth in the Chubb Insurance Program, nothing shall permit or otherwise effectuate a sale, assignment or other transfer of the Chubb Insurance Program and/or any rights, benefits, claims, proceeds, rights to payment, or recoveries under and/or relating to the Chubb Insurance Program, or any collateral provided on account of the Chubb Insurance Program, without the prior express written consent of the Chubb Companies;

(e) the automatic stay of section 362(a) of the Bankruptcy Code and the injunctions set forth in Article X, Section 10.5 of the Plan, if and to the extent applicable, shall be deemed lifted without further order of the Bankruptcy Court, solely to permit: (i) claimants with valid workers' compensation or direct action claims against the Chubb Companies under applicable non-bankruptcy law to proceed with their claims; (ii) the Chubb Companies to administer, handle, defend, settle, and/or pay, in the ordinary course of business and without further order of this Bankruptcy Court: (1) workers' compensation claims, (2) claims where a claimant asserts a direct claim against the Chubb Companies under applicable non-bankruptcy law, (3) claims where an order has been entered by this Bankruptcy Court granting a claimant relief from the automatic stay or the injunction set forth in Article X, Section 10.5 of the Plan to proceed with its claim; and (4) all costs in relation to each of the foregoing; (iii) the Chubb Companies to draw against any or all of the

collateral or security provided by or on behalf of the Debtors (or the Reorganized Debtors, as applicable) at any time and to hold the proceeds thereof as security for the obligations of the Debtors (and the Reorganized Debtors, as applicable) and/or apply such proceeds to the obligations of the Debtors (and the Reorganized Debtors, as applicable) under the Chubb Insurance Program, in such order as the Chubb Companies may determine in accordance with and subject to the terms and conditions of the Chubb Insurance Program; and (iv) the Chubb Companies to cancel the Chubb Insurance Program, and take other actions relating thereto (including effectuating a setoff or recoupment) in accordance with and subject to the terms and conditions of the Chubb Insurance Program and applicable non-bankruptcy law; *provided*, *however*, that the Debtors, the Reorganized Debtors and Chubb Companies reserve all of their respective rights and defenses, if any, under applicable non-bankruptcy law and the Chubb Insurance Program to the extent Chubb Companies takes any action permitted by this sub-paragraph (e)(iv); and

(f) nothing in the second paragraph of Article X, Section 10.5 of the Plan or any corresponding paragraph of this Confirmation Order requires, precludes and/or prohibits the Chubb Companies to or from administering, handling, defending, settling and/or paying claims covered by the Chubb Insurance Program in accordance with and subject to the terms and conditions of the Chubb Insurance Program and/or applicable non-bankruptcy law.

For the avoidance of doubt, nothing herein expands, limits or affects the rights of the Chubb Companies under the Chubb Insurance Program.

25. Treatment of the Endurance Insurance Programs. Notwithstanding anything to the contrary in this Confirmation Order, the Plan, or any related Assumption Notice, the policies issued by Endurance American Specialty Insurance Company ("***Endurance***"), including but not limited to two Healthcare Professional Services Liability, General Liability, and Employee Benefits Liability Policies issued to non-Debtor OEP AM Holdings, LLC, bearing Policy Nos. HLA100148512500 and HLA100148512501 (the "***Policies***"), which include a number of Debtors as additional insureds, shall be assumed solely to the extent of the applicable Debtors' remaining rights thereunder. In conformance with Debtors' cure obligations, Debtors shall pay $42,901.17 to Endurance within thirty (30) days of the Effective Date. Further, as allowed by the Insurance Order, Debtors or Reorganized Debtors (as applicable) shall timely pay all deductibles and other amounts due under the Policies as they come due, and Endurance is authorized to pay defense

costs and other amounts under the Policies pursuant the terms of the Policies. Nothing contained in the Plan or this Confirmation Order shall alter, modify, or amend any terms and conditions in the Policies or the rights and obligations of the Debtors, Reorganized Debtors or Endurance thereunder (including any defenses to coverage) and, for the avoidance of doubt, Endurance shall not be required to pay or satisfy any amounts in excess of any amounts required by any of the applicable Policies or to cover or pay any claims or costs that Endurance would otherwise not pay under the Policies.

26. Treatment of the Humana Insurance Programs. As to Humana Inc., Humana Insurance Company, Humana Medical Plan, Inc., Humana Insurance Company of Florida, Inc., and their affiliates ("***Humana***") and the Debtors, nothing in the Plan, this Confirmation Order, or related Plan documents shall enjoin or impair any statutory or common law setoff rights as recognized in section 553 of the Bankruptcy Code and applicable bankruptcy and nonbankruptcy law, or the recoupment rights of Humana or the Debtors in their contracts. All such setoff and recoupment rights of Humana and the Debtors are preserved and are not required to have been asserted prior to the Confirmation Date. For all Humana contracts assumed under the Plan, in lieu of cure, all obligations due and unpaid under the contracts accruing prior to the Effective Date shall be unimpaired and will be paid or collected in the ordinary course of business.

27. Humana shall not be considered a Releasing Party or a Released Party. Notwithstanding anything to the contrary in the Plan, this Confirmation Order, or related Plan documents, nothing therein shall be deemed as a waiver or relinquishment of any rights, claims, causes of action, rights of setoff or recoupment, or other legal or equitable claims or defenses that Humana and the Debtors and Reorganized Debtors may have under bankruptcy or non-bankruptcy

law in connection with any claims, liabilities, or causes of action arising from any Humana contract.

28. Elevance Health, Inc. On the Effective Date, all of the Agreements (as that term is defined in the *Limited Objection of Elevance Health, Inc. to Assumption or Assumption and Assignment of Executory Contracts* [Docket. No. 749] (the "***Elevance Cure Objection***")) and any other agreements between Elevance Health, Inc. or its direct or indirect affiliates and subsidiaries (collectively, "***Elevance***"), on the one hand, and any of the Debtors, on the other hand, for the provision of non-emergency transportation services as may be identified by the Debtors and Elevance in writing prior to the Effective Date (collectively, the "***Elevance Agreements***") shall be assumed by the Debtors. Notwithstanding anything in the Plan or this Confirmation Order to the contrary and in resolution of the Elevance Cure Objection, all obligations owing to either the Debtors or Elevance under the Elevance Agreements shall pass through and survive assumption, and will be paid in the ordinary course of business under the Elevance Agreements. Nothing in the Plan or this Confirmation Order shall affect the rights of recovery, setoff, or recoupment of Elevance or the Debtors under the Elevance Agreements.

29. Missouri Department of Revenue. Notwithstanding anything to the contrary in the Plan or this Confirmation Order, to the extent that the priority tax claims of the Missouri Department of Revenue have not been paid in full prior to the Effective Date, such claims will be paid either (a) in full on the Effective Date or (b) in equal monthly installments commencing on the Effective Date and continuing over a period ending not later than sixty (60) months after the Petition Date. Each equal monthly payment shall in addition include interest at the statutory interest rate of 8% per annum from the Effective Date.

30. Texas Comptroller. Notwithstanding anything else to the contrary in the Plan or this Confirmation Order, the Texas Comptroller of Public Accounts (the "***Texas Comptroller***") reserves the following rights: (a) any statutory or common law setoff rights of the Texas Comptroller in accordance with 11 U.S.C. § 553; (b) any rights of the Texas Comptroller to pursue any non-debtor third parties for tax debts or claims; (c) the payment of interest on the Texas Comptroller's Allowed administrative expense tax claims, if any; (d) subject to any applicable limitation in the Bankruptcy Code, to the extent that interest is payable with respect to any Allowed administrative expense, priority or secured tax claim of the Texas Comptroller, payment of the statutory rate of interest pursuant to Texas Tax Code § 111.060; and (e) the Texas Comptroller is not required to file a motion or application for payment of administrative expense claims pursuant to 11 U.S.C. § 503(b)(1)(D). For the avoidance of doubt, the Texas Comptroller's rights are reserved regarding receiving interest on its Allowed Priority Tax Claims after the Effective Date as required by sections 511 and 1129(a)(9)(C) of the Bankruptcy Code. The Debtors', Reorganized Debtors', and Texas Comptroller's rights and defenses under Texas state law and the Bankruptcy Code with respect to the foregoing are fully preserved. Nothing contained in the Plan or this Confirmation Order will be deemed to be a waiver or relinquishment of, or otherwise affect, any rights, claims, causes of action, rights of setoff or recoupment, rights to appeal tax assessments, or other legal or equitable defenses that any Debtor, Reorganized Debtor, or non-Debtor third party has under non-bankruptcy law in connection with any claim, liability or cause of action of the Texas Comptroller.

31. Texas Taxing Authorities. The Texas Taxing Authorities[4] assert that they are Holders of Claims for ad valorem taxes for tax year 2025 (the "***Texas Taxing Authority Claims***").

[4] "***Texas Taxing Authorities***" are defined to include all ad valorem taxing jurisdictions represented by Perdue Brandon Fielder Collins & Mott LLP, McCreary Veselka Bragg & Allen, P.C., and Linebarger Goggan Blair &

Notwithstanding anything to the contrary in this Confirmation Order or the Plan, the Debtors or Reorganized Debtors shall pay the Texas Taxing Authority Claims in the ordinary course of business on the later of (a) prior to the date the Texas Taxing Authority Claims become due pursuant to the Texas Tax Code (subject to any applicable extensions, grace periods, or similar rights under the Texas Tax Code) and (b) the Effective Date (or as soon as reasonably practicable thereafter). To the extent the Texas Tax Code provides for interest and/or penalties with respect to any portion of the Texas Taxing Authority Claims, nothing in the Plan or this Confirmation Order prevents the inclusion of such interest and/or penalties in the Texas Taxing Authority Claims, and the Debtors' and Reorganized Debtors' defenses and rights to object to such Claims or to the inclusion of such interest or penalties in such Claims on any grounds are fully reserved and preserved. The Texas Taxing Authorities shall retain the liens (if any) that secure any Texas Taxing Authority Claims, in their pre-petition priority (to the extent the Texas Taxing Authorities' liens are valid, senior, perfected, binding, enforceable and non-avoidable), until the taxes due under this Confirmation Order are fully paid. All rights and defenses of the Debtors and the

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Sampson LLP, in connection with the Chapter 11 Cases, including but not limited to the Taxing Districts Collected by Randall County, Taxing Districts Collected by Potter County, Childress County Appraisal District, Gray County Tax Office, Hale County Appraisal District, Hutchinson County, Lubbock Central Appraisal District, Midland County, San Jacinto Community College District, City of Houston, Alief Independent School District, Humble Independent School District, Klein Independent School District, La Porte Independent School District, Pasadena Independent School District, Spring Independent School District, Spring Branch Independent School District, Tomball Independent School District, Brazoria County, Brownsville Independent School District, Frisco ISD, Plano ISD, Wichita County, Dimmit County, Montgomery County Municipal Utility District # 60, Montgomery County Municipal Utility District # 95, Montgomery County Municipal Utility District #119, Magnolia Independent School District, The Woodlands Metro Center Mud, Willis Independent School District, The Woodlands Road Utility District # 1, Central Appraisal District of Taylor County, Reeves County Tax District, The County of Hays, Texas, County of Erath, The County of Denton, Texas, The County of Comal, Texas, Burnet Central Appraisal District, The County of Brazos, Texas, San Marcos CISD, Hays CISD, McLennan County, City of McAllen, Hidalgo County, Cameron County, Nueces County, City of Frisco, Gregg County, Tom Green CAD, Navarro County, City of Allen, Grayson County, Smith County, Stephenville ISD, Lewisville ISD, Allen ISD, Ellis County, City of Stephenville, Parker CAD, Tarrant County, Dallas County, Harris County ESD #09, Houston ISD, City of Houston, Harris County ESD #07, Harris County ESD #11, Harris County ESD #16; Galveston County, Houston Community College System, Fort Bend County, Texas City ISD, Lone Star College System, Cypress-Fairbanks ISD, Jefferson County, Montgomery County, Katy ISD, Bexar County, City of El Paso.

Reorganized Debtors under applicable law are reserved and preserved with respect to such Texas Taxing Authority Claims.

32. The United States. Nothing in this Confirmation Order or the Plan shall effect a release of any claim by the United States Government or any of its agencies or any state and local authority whatsoever, including without limitation any claim arising under the Internal Revenue Code, the environmental laws or any criminal laws of the United States or any state and local authority against any party or person, nor shall anything in this Confirmation Order or the Plan enjoin the United States or any state or local authority from bringing any claim, suit, action, or other proceedings against any party or person for any liability of such persons whatever, including without limitation any claim, suit or action arising under the Internal Revenue Code, the environmental laws or any criminal laws of the United States or any state and local authority against such persons, nor shall anything in this Confirmation Order or the Plan exculpate any party or person from any liability to the United States Government or any of its agencies or any state and local authority whatsoever, including any liabilities arising under the Internal Revenue Code, the environmental laws or any criminal laws of the United States or any state and local authority against any party or person.

VII. Treatment of Executory Contracts and Unexpired Leases

33. The Debtors have exercised sound business judgment in determining whether to reject, assume, or assume and assign each of their Executory Contracts and Unexpired Leases pursuant to sections 365 and 1123(b)(2) of the Bankruptcy Code, Article VIII of the Plan, and as set forth in the Plan Supplement. Except as set forth herein and/or in separate orders entered by the Court relating to the assumption of Executory Contracts or Unexpired Leases, the Debtors have cured or provided adequate assurance that the Debtors will cure defaults (if any) under or relating to each Executory Contract or Unexpired Lease assumed under the Plan and, for each Executory

Contract or Unexpired Lease being assigned under the Plan (if any), such assignee has provided adequate assurance of future performance as required under section 365(f)(2)(B) of the Bankruptcy Code.

34. Assumption (or assumption and assignment) of the Executory Contracts and Unexpired Leases as set forth in Section 8.1(a) of the Plan is hereby authorized. Rejection of the Executory Contracts and Unexpired Leases as set forth in Section 8.1(b) of the Plan and in the Plan Supplement is hereby authorized. Unless an Executory Contract or Unexpired Lease: (a) was previously assumed, assumed and assigned, or rejected by the Debtors by prior order of this Court; (b) is the subject of a motion to reject filed by the Debtors that is pending on the Effective Date; (c) is identified as rejected in the Plan Supplement; (d) is rejected by the Debtors or terminated pursuant to the terms of the Plan, effective as of the Effective Date; or (e) is the subject of a pending Assumption Dispute, such Executory Contract or Unexpired Lease shall be deemed to have been assumed by the applicable Reorganized Debtor, in each case consistent with the Definitive Documents, including the Restructuring Transactions.

35. Unless a party to an Executory Contract or Unexpired Lease being assumed (or assumed and assigned) under the Plan has timely objected to the assumption or assumption and assignment of such Executory Contract or Unexpired Lease and/or the Proposed Cure, the Debtors shall pay such Proposed Cure in accordance with the terms of the Plan and the assumption (or assumption and assignment) of any Executory Contract or Unexpired Lease, pursuant to the Plan or otherwise, shall result in the full release, discharge and satisfaction of any Claims or defaults, whether monetary or nonmonetary, including defaults of provisions restricting the change in control or ownership interest composition or other bankruptcy-related defaults, arising under any assumed Executory Contract or Unexpired Lease at any time prior to the effective date of

assumption and/or assignment and the counterparty to such Executory Contract or Unexpired Lease shall be deemed to have consented to such assumption or assumption and assignment.

36. Notwithstanding anything to the contrary in the Plan, in the event of an Assumption Dispute regarding the amount and timing of any Proposed Cure, the Reorganized Debtors and applicable non-Debtor parties shall promptly confer after the Effective Date to attempt to resolve any such dispute consensually without further order of this Court. Notwithstanding anything to the contrary in the Plan, in the event such Assumption Dispute cannot be resolved consensually by the applicable parties, then the Reorganized Debtors shall, within thirty (30) days after the Effective Date, file a notice of dispute with the Court (and promptly serve such notice on the applicable counter-party) and such dispute shall be set for a status conference at the next scheduled omnibus hearing in the Chapter 11 Cases, with subsequent evidentiary hearings to be established by the Court as and if necessary. The payments, if any, or other actions, if any, that the Court determines the Reorganized Debtors are required to pay or otherwise perform to assume the applicable Executory Contract or Unexpired Lease pursuant to section 365(b)(1) of the Bankruptcy Code shall be promptly paid or undertaken as required by Final Order resolving the applicable dispute. If an objection to the proposed cure amount is sustained by Final Order of this Court, the Reorganized Debtors in their sole option, may elect to reject such Executory Contract or Unexpired Lease in lieu of assuming or assigning it by filing written notice thereof with this Court, and serving such notice on the applicable counter-party, within ten (10) days of the entry of such Final Order.

VI. Standing Motions

37. The Standing Motions are denied in their entirety for the reasons set forth by the Court on record at the Confirmation Hearing. The Court may further supplement its bench decisions on the Standing Motions with a written opinion.

VIII. Miscellaneous

38. Any objections to Claims shall be Filed by no later than the Claims Objection Deadline; *provided that* nothing contained herein or in the Plan shall limit the Reorganized Debtors' right to object to Claims, if any, Filed or amended after the Claims Objection Deadline. Moreover, notwithstanding the expiration of the Claims Objection Deadline, the Debtors or the Reorganized Debtors shall continue to have the right to amend any Claims objections or other objections and to File and prosecute supplemental objections and counterclaims to a Disputed Claim until such Disputed Claim is Allowed.

39. The Plan shall not become effective unless and until all conditions set forth in Section 9.1 of the Plan have been satisfied or waived pursuant to Section 9.3 of the Plan.

40. Pursuant to the Court's ruling on the record, the fourteen (14) day stay of this Confirmation Order imposed under Bankruptcy Rule 3020(e), is modified and the stay is in place through December 16, 2025, and is thereafter waived, and the Debtors are hereby authorized to consummate the Plan and the transactions contemplated thereby immediately upon expiration of the modified stay on December 17, 2025, subject to the satisfaction or waiver of the conditions set forth in Article IX of the Plan. This Confirmation Order is a Final Order and the period in which an appeal thereof must be filed shall commence upon its entry.

41. The provisions of the Plan and this Confirmation Order, including the findings of fact and conclusions of law set forth herein, are non-severable and mutually dependent.

42. To the extent of any inconsistency between this Confirmation Order and the Plan, the terms and conditions of this Confirmation Order shall govern.

Signed: December 15, 2025

Alfredo R Pérez
United States Bankruptcy Judge

Exhibit A

Plan

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
Debtors.[1]	:	(Jointly Administered)

SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES

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Counsel for the Debtors and Debtors in Possession

Dated: December 5, 2025
Houston, Texas

[1] A complete list of each of the Debtors in 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.'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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SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES

ModivCare Inc. and each of the other debtors and debtors-in-possession in the above-captioned cases (collectively, the "***Debtors***") jointly propose this Plan for the treatment and resolution of the outstanding Claims against, and Interests in, the Debtors. Capitalized terms used shall have the meanings ascribed to such terms in Article I.A unless defined elsewhere in this Plan.

Other than with respect to Debtor ModivCare Inc., the Plan provides for the substantive consolidation of all of the Debtors solely for the purposes of voting, determining which Class or Classes have accepted the Plan, confirming the Plan, and the resulting treatment of all Claims and Interests and Plan distributions. The Debtors seek to consummate the Restructuring Transactions on the Effective Date. Each Debtor is a proponent of this Plan within the meaning of section 1129 of the Bankruptcy Code.

This Plan shall be deemed a motion to approve the good-faith compromises and settlements of all Claims, Interests, Causes of Action, and controversies pursuant to Bankruptcy Rule 9019.

Reference is made to the Disclosure Statement for a discussion of the Debtors' history, businesses, results of operations, historical financial information, projections, and future operations, as well as a summary and analysis of this Plan and certain related matters, including distributions to be made under this Plan. There also are other agreements and documents, which shall be Filed with the Bankruptcy Court, that are referenced in this Plan, the Plan Supplement, or the Disclosure Statement as exhibits and schedules. All such exhibits and schedules are incorporated into and are a part of this Plan as if set forth in full herein. Subject to certain restrictions and requirements set forth in 11 U.S.C. § 1127, Fed. R. Bankr. P. 3019, and the terms and conditions set forth in the Restructuring Support Agreement and this Plan, the Debtors reserve the right to alter, amend, modify, revoke, or withdraw this Plan before its substantial consummation.

ALL HOLDERS OF CLAIMS ENTITLED TO VOTE ON THIS PLAN ARE ENCOURAGED TO READ THIS PLAN AND THE DISCLOSURE STATEMENT IN THEIR ENTIRETY BEFORE VOTING TO ACCEPT OR REJECT THIS PLAN.

ARTICLE I.

DEFINITIONS AND INTERPRETATION.

A. Definitions.

The following terms shall have the respective meanings specified below:

"***Administrative Claim***" means a Claim for costs and expenses of administration of the Chapter 11 Cases pursuant to sections 503(b), 507(a)(2), 507(b), or 1114(e)(2) of the Bankruptcy Code, including, without limitation: (a) the actual and necessary costs and expenses incurred on or after the Petition Date until and including the Effective Date of preserving the Estates and operating businesses, including fees and expenses Allowed by the Bankruptcy Court as compensation for services rendered or reimbursement of expenses incurred through and including the Effective Date under sections 330, 331, 503(b)(2), 503(b)(3), 503(b)(4), or 503(b)(5) of the Bankruptcy Code; and (b) all fees and charges assessed against the Estates pursuant to section 1930 of chapter 123 of title 28 of the United States Code.

"***Affiliate***" shall, with respect to an Entity, have the meaning set forth in section 101(2) of the Bankruptcy Code as if such Entity were a debtor in a case under the Bankruptcy Code.

"***Allowed***" means, with reference to any Claim or Interest, (a) any Claim or Interest arising on or before the Effective Date that is evidenced by a Proof of Claim or proof of Interest Filed by the applicable Claims Bar Date (i) as to which no objection to allowance, priority, or secured status, and no request for estimation or other challenge, including, without limitation, pursuant to section 502(d) of the Bankruptcy Code or otherwise, has been interposed prior to the Claims Objection Deadline, or (ii) as to which any objection has been determined by a Final Order to the extent such objection is determined in favor of the respective Holder, (b) any Claim or Interest that is compromised, settled, or otherwise resolved pursuant to the authority of the Debtors or Reorganized Debtors, as applicable, (c) any Claim or Interest as to which the liability of the Debtors or Reorganized Debtors, as applicable, and the amount thereof are determined by a Final Order of a court of competent jurisdiction other than the Bankruptcy Court, or (d) any Claim or Interest expressly allowed hereunder; *provided*, *however*, that notwithstanding the foregoing, (x) unless expressly waived by this Plan (including as to the First Lien Claims and the Second Lien Claims), the Allowed amount of Claims or Interests shall be subject to and shall not exceed the limitations under or maximum amounts permitted by the Bankruptcy Code, including sections 502 or 503 of the Bankruptcy Code, to the extent applicable, and (y) the Reorganized Debtors shall retain all claims and defenses with respect to Allowed Claims that are Reinstated or otherwise Unimpaired pursuant to the Plan.

"***Asset***" means all rights, title, and interests of the Debtors or Reorganized Debtors, as applicable, in and to property of whatever type or nature, including real, personal, mixed, intellectual, tangible, and intangible property.

"***Avoidance Action***" means any and all actual or potential avoidance, recovery, subordination, or similar actions or remedies that may be brought by or on behalf of the Debtors or the Estates under the Bankruptcy Code or applicable non-bankruptcy law, including actions or remedies arising under chapter 5 and section 724(a) of the Bankruptcy Code or under similar or related local, state, federal, or foreign statutes and common law, including fraudulent transfer laws, fraudulent conveyance laws, or other similar related laws, in each case whether or not litigation to prosecute such Claim(s) and Cause(s) of Action was commenced prior to the Effective Date.

"***Bankruptcy Code***" means title 11 of the United States Code, 11 U.S.C. § 101, et seq., as amended from time to time, as applicable to the Chapter 11 Cases.

"***Bankruptcy Court***" means the United States Bankruptcy Court for the Southern District of Texas, Houston Division, or such other court having jurisdiction over the Chapter 11 Cases.

"***Bankruptcy Rules***" means the Federal Rules of Bankruptcy Procedure as promulgated by the United States Supreme Court under section 2075 of title 28 of the United States Code and any Local Bankruptcy Rules of the Bankruptcy Court, in each case, as amended from time to time and applicable to the Chapter 11 Cases.

"***Business Day***" means any day, other than a Saturday, Sunday, "legal holiday" (as that term is defined in Bankruptcy Rule 9006(a)), or any other day on which banking institutions in New York, New York are required or authorized by law or executive order to close by law or executive order.

"***Cash***" means cash in legal tender of the United States of America and cash equivalents, including bank deposits, checks, and other similar items.

"***Cash Collateral***" shall have the meaning set forth in the DIP Orders.

"***Causes of Action***" means any action, claim, cross-claim, third-party claim, cause of action, controversy, dispute, proceeding, demand, right, lien, indemnity, contribution, guaranty, suit, obligation, liability, loss, debt, fee or expense, damage, interest, judgment, cost, account, defense, remedy, offset, power, privilege, proceeding, license and franchise of any kind or character whatsoever, known, unknown, foreseen or unforeseen, existing or hereafter arising, contingent or non-contingent, matured or unmatured, suspected or unsuspected, liquidated or unliquidated, Disputed or undisputed, secured or unsecured, assertable directly or derivatively (including any alter ego theories), choate, inchoate, reduced to judgment or otherwise whether arising before, on, or after the Petition Date, in contract or in tort, in law or in equity or pursuant to any other theory of law (including under any state or federal Securities laws). Causes of Action also includes: (a) any right of setoff, counterclaim or recoupment and any claim for breach of contract or for breach of duties imposed by law or in equity; (b) the right to object to Claims or Interests; (c) any claim pursuant to section 362 or chapter 5 of the Bankruptcy Code; (d) any claim or defense including fraud, mistake, duress and usury and any other defenses set forth in section 558 of the Bankruptcy Code; (e) any state law fraudulent transfer claim; and (f) any Avoidance Actions.

"***Chapter 11 Cases***" means (a) when used with reference to a particular Debtor, the case under chapter 11 of the Bankruptcy Code commenced by such Debtor in the Bankruptcy Court, and (b) when used with reference to all Debtors, the jointly administered cases under chapter 11 of the Bankruptcy Code commenced by the Debtors in the Bankruptcy Court.

"***Claim***" means (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured, or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured, each as set forth in section 101(5) of the Bankruptcy Code.

"***Claims Bar Date***" means the applicable deadline by which Proofs of Claim must be Filed under the Claims Bar Date Order.

"***Claims Bar Date Order***" means the *Order Establishing (A) Bar Dates and Related Procedure for Filing Proofs of Claim, (B) Approving the Form and Manner of Notice Thereof, and (C) Granting Related Relief* [Docket No. 66].

"***Claims Objection Deadline***" means the date that is ninety (90) days after the Effective Date; *provided that*, the Claims Objection Deadline is ninety (90) days after the Governmental Bar Date for a Proof of Claim filed by a governmental unit (as defined in section 101(27) of the Bankruptcy Code), which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.

"***Class***" means any group of Claims or Interests classified as set forth in Article III of this Plan pursuant to sections 1122 and 1123(a)(1) of the Bankruptcy Code.

"***Collateral***" means any Asset of an Estate that is subject to a Lien securing the payment or performance of a Claim, which Lien is not invalid and has not been avoided under the Bankruptcy Code or applicable non-bankruptcy law, and any Security as such term is defined in section 101(49) of the Bankruptcy Code.

"***Committee***" means the statutory committee of unsecured creditors appointed in the Chapter 11 Cases pursuant to section 1102 of the Bankruptcy Code by the United States Trustee.

"***Conditions Precedent***" has the meaning set forth in Article IX of this Plan.

"***Confirmation***" means the Bankruptcy Court's entry of the Confirmation Order on the docket of the jointly administered Chapter 11 Cases.

"***Confirmation Date***" means the date upon which Confirmation occurs.

"***Confirmation Hearing***" means the hearing to be held by the Bankruptcy Court pursuant to sections 105(d)(2)(B)(vi) and 1128 of the Bankruptcy Code to consider (a) final approval of the Disclosure Statement under sections 1125 and 1126(b) of the Bankruptcy Code (if not previously approved on a final basis) and (b) Confirmation of this Plan, as such hearing may be adjourned or continued from time to time.

"***Confirmation Order***" means the order of the Bankruptcy Court confirming this Plan pursuant to section 1129 of the Bankruptcy Code, and if not previously approved, approving the Disclosure Statement on a final basis pursuant to section 1125 of the Bankruptcy Code.

"***Consenting Creditors***" means, collectively, the Consenting First Lien Lenders, the Consenting Second Lien Noteholders, and any other person who executes or is required to execute a joinder to the Restructuring Support Agreement in accordance with the terms thereof.

"***Consenting First Lien Lenders***" means the Initial Consenting First Lien Lenders together with any First Lien Lender that subsequently becomes a party to the Restructuring Support Agreement as a "Consenting First Lien Lender" thereunder.

"***Consenting Second Lien Noteholders***" means the Holders of Second Lien Claims that are party to the Restructuring Support Agreement together with any Holder of Second Lien Claims that subsequently becomes a party to the Restructuring Support Agreement as a "Consenting Second Lien Noteholder" thereunder.

"***Corporate Governance Documents***" means, with respect to any Person other than a natural person, the organizational and corporate governance documents for each such Person including limited liability company agreements, operating agreements, certificates of incorporation, certificates of formation, certificates of limited partnership, articles of organization (or equivalent organizational documents), warrant agreements, certificates of designation for preferred stock or other forms of preferred equity, by-

laws, partnership agreements, shareholders' agreements, members' agreement, or equivalent governing documents.

"***Cure Claim***" means a Claim based upon a Debtor's defaults (unless such defaults, or the Claim arising as a result of such defaults, are waived or modified by the applicable counterparty) under an Executory Contract or an Unexpired Lease assumed by such Debtor under section 365 of the Bankruptcy Code, other than a default that is not required to be cured pursuant to section 365(b)(2) of the Bankruptcy Code.

"***D&O Policy***" means, collectively, all insurance policies (including any "tail policy") issued or providing coverage to any of the Debtors for current or former directors', managers', and officers' liability, and all agreements, documents, or instruments related thereto.

"***Debtor***" or "***Debtors***" has the meaning set forth in the introductory paragraph of this Plan.

"***Debtor Release***" means the releases set forth in Article X, Section 10.6(a).

"***Definitive Documents***" means, collectively, all documents and agreements governing the Restructuring Transactions and shall include all documents necessary or reasonably desirable to implement the Restructuring Transactions, including, but not limited to: (a) this Plan and the Plan Supplement; (b) the Disclosure Statement and the Solicitation Packages and exhibits related thereto; (c) the Solicitation Procedures Order; (d) the Confirmation Order; (e) the Exit Facilities Documents; (f) the New Warrants Documents; (g) the New Corporate Governance Documents; (h) the Equity Rights Offering Documents; (i) the DIP Backstop Commitment Letters; (j) the New Common Interests Documents; (k) the DIP Documents; (l) the Restructuring Transaction Steps Memorandum; and (m) any other agreement, document, instrument, material pleading and/or order entered into, or utilized, in connection with or to implement the Restructuring Transaction (together with any exhibit, amendment, modification or supplement thereto), in each case, consistent with the Restructuring Support Agreement.

"***DIP Agent***" means the "Administrative Agent" and the "Collateral Agent" (each, as defined in the DIP Credit Agreement), solely in its capacity as administrative agent and collateral agent under the DIP Credit Agreement, its successors, assigns, or any replacement agent appointed pursuant to the terms of the DIP Credit Agreement.

"***DIP Backstop Commitment Letters***" means those certain backstop commitment letters entered into by the Debtors and the Backstop Parties (as defined in the Restructuring Support Agreement).

"***DIP Backstop Commitment Parties***" means the DIP Backstop Commitment Parties as defined in the DIP Backstop Commitment Letters.

"***DIP Backstop Premium***" means the DIP Backstop Commitment Parties' backstop premium, received by the DIP Backstop Commitment Parties in the allocations set forth in their respective DIP Backstop Commitment Letters, which premium shall be payable on the Effective Date, in full in-kind in the form of New Common Interests equal to 20% of the aggregate New Common Interests, subject to dilution by the MIP, the New Warrants, and the New Common Interests issued pursuant to the Equity Rights Offering.

"***DIP Claims***" means all Claims held by the DIP Lenders or the DIP Agent on account of, arising under, or relating to the DIP Credit Agreement, the DIP Facility, or the DIP Orders, including Claims for all principal amounts outstanding, and any and all fees, interest, expenses, indemnification obligations, reimbursement obligations, and other amounts due under the DIP Documents.

"***DIP Credit Agreement***" means that certain Superpriority Secured Debtor In Possession Credit Agreement dated as of August 22, 2025 and entered into by and among ModivCare, as borrower, the guarantors party thereto, the DIP Agent, and lenders party thereto (as may be amended, restated, amended and restated, supplemented or otherwise modified from time to time in accordance with its terms).

"***DIP Documents***" means the DIP Credit Agreement, the other "Loan Documents" as defined in the DIP Credit Agreement, and the DIP Backstop Commitment Letters, in each case as amended, amended and restated, supplemented or otherwise modified from time to time in accordance with the terms thereof prior to the Effective Date.

"***DIP Facility***" means the debtor-in-possession financing facility provided by the DIP Lenders.

"***DIP Lenders***" means the lenders party to the DIP Credit Agreement from time to time.

"***DIP Loans***" means the loans extended under the DIP Facility.

"***DIP Orders***" means, collectively, the Interim DIP Order and the Final DIP Order.

"***Disclosure Statement***" means the disclosure statement in respect of this Plan, including all exhibits, schedules, supplements, modifications, amendments, annexes and attachments thereto, as approved or ratified by the Bankruptcy Court pursuant to sections 1125 and 1126 of the Bankruptcy Code.

"***Disputed***" means with respect to a Claim: (a) any Claim, which is disputed under Article VII of this Plan or as to which the Debtors have interposed and not withdrawn an objection or request for estimation that has not been determined by a Final Order; (b) any Claim, proof of which was required to be timely and proper but as to which no such Proof of Claim was Filed; (c) any Claim that is listed in the Schedules, if any are Filed, as unliquidated, contingent, or disputed, and as to which no request for payment or Proof of Claim has been Filed; (d) any Claim or Interest that is not yet Allowed, but has not yet been disallowed pursuant to this Plan, the Bankruptcy Code, or a Final Order of the Bankruptcy Court or other court of competent jurisdiction; or (e) any Claim that is otherwise disputed by any of the Debtors or the Reorganized Debtors in accordance with applicable law or contract, which dispute has not been withdrawn, resolved or overruled by a Final Order. To the extent the Debtors dispute only the amount of a Claim, such Claim shall be deemed Allowed in the amount the Debtors do not dispute, if any, and Disputed as to the balance of such Claim.

"***Distribution Agent***" means any Entity (including any applicable Debtor or Reorganized Debtor, as applicable, if it acts in such capacity) in its capacity as a Distribution Agent under Article VI of this Plan.

"***Distribution Record Date***" means the Effective Date, or such other time as designated by the Debtors with the consent of the Required Consenting First Lien Lenders.

"***DTC***" means The Depository Trust Company.

"***Effective Date***" means the date on which (a) no stay of the Confirmation Order is in effect, (b) each of the conditions precedent set forth in Article IX of this Plan have been satisfied or waived in accordance with the terms of Article IX, and (c) the Debtors File a notice declaring the Plan to be effective. Without limiting the foregoing, any action to be taken on the Effective Date may be taken on or as soon as reasonably practicable after the Effective Date.

"***Election Procedures***" means the procedures with respect to the Equity Option (including limitations with respect thereto) to be set forth in the Plan Supplement, in form and substance acceptable to the Required Consenting First Lien Lenders.

"***Eligible Holder***" means a Holder of an Allowed General Unsecured Claim or Allowed Subordinated Unsecured Notes Claim that is an Accredited Investor (as defined in Rule 501 under the Securities Act) or Qualified Institutional Buyer (as defined in Rule 144A under the Securities Act).

"***Employee Plans***" means the employment agreements (including but not limited to offer letters) and severance policies, and all employment, compensation and benefit plans, retention plans, workers' compensation programs, savings plans, retirement plans, deferred compensation plans, healthcare plans, disability plans, severance plans, incentive plans, life and accidental and dismemberment insurance plans, and policies and programs of each of the Debtors applicable to any of its employees and retirees, in each case existing as of the Effective Date.

"***Entity***" means an individual, corporation, partnership, limited liability partnership, limited liability company, association, joint stock company, joint venture, estate, trust, unincorporated organization, government unit (as defined in section 101(27) of the Bankruptcy Code) or any political subdivision thereof, or other person (as defined in section 101(41) of the Bankruptcy Code) or other entity.

"***Equity Option***" has the meaning set forth in Article V, Section 5.15 of this Plan.

"***Equity Rights Offering***" means that certain equity rights offering to be consummated by the Reorganized Parent on the Effective Date in accordance with the Equity Rights Offering Documents, pursuant to which the Reorganized Parent shall issue to certain Eligible Holders of Allowed General Unsecured Claims and Allowed Subordinated Unsecured Notes Claims the right to purchase New Common Interests for an aggregate amount of up to $200,000,000 at a valuation equal to the Equity Rights Offering Valuation, pursuant to applicable exemptions from registration under the Securities Act.

"***Equity Rights Offering Documents***" means, collectively, the agreements, instruments, certificates or other documents memorializing the Equity Rights Offering, as may be amended, restated, supplemented, or otherwise modified from time to time according to their respective terms.

"***Equity Rights Offering Procedures***" means those certain rights offering procedures with respect to the Equity Rights Offering as set forth in the Equity Rights Offering Documents and as approved by the Bankruptcy Court.

"***Equity Rights Offering Valuation***" means a valuation of the New Common Interests such that Holders of First Lien Claims would recover 100% on account of their Allowed First Lien Claims.

"***Estate***" or "***Estates***" means, individually or collectively, the estate or estates of the Debtors created under section 541 of the Bankruptcy Code.

"***Exculpated Parties***" means each of the following in their capacities as such and, in each case, to the maximum extent permitted by law: (a) the Debtors and their Estates; (b) each independent director of the Debtors; and (c) the Committee and each member of the Committee.

"***Exchange Act***" means the Securities Exchange Act of 1934, as amended.

"***Executory Contract***" means a contract to which one or more Debtors is a party that is subject to assumption or rejection under section 365 of the Bankruptcy Code.

"***Existing Parent Equity Interest***" means all issued, unissued, authorized, or outstanding ordinary shares or shares of common stock, preferred stock, other instrument evidencing an ownership interest, and/or any other Interest, in ModivCare, whether or not transferable, together with any warrants, options, equity-based awards, or contractual rights to purchase or acquire such interests at any time and all rights arising with respect thereto that existed immediately before the Effective Date.

"***Exit Facilities***" means, collectively, (a) the Exit Term Loan Facility and (b) the Exit Revolving Facility.

"***Exit Facilities Documents***" means, collectively, (a) the Exit Term Loans Documents and (b) the Exit Revolver Documents.

"***Exit Facility Term Credit Agreement"*** means that certain credit agreement to be entered into in connection with the Exit Term Loan Facility. The Exit Facility Term Credit Agreement shall be dated on or around the Effective Date, by and among Reorganized Parent, as borrower, the administrative agent and collateral agent thereto, and the lenders party thereto.

"***Exit Revolving Facility***" means a revolving credit facility in the principal amount of up to $250,000,000, inclusive of a letter of credit sublimit of up to $150,000,000 (the "***Exit LC Facility***") under the Exit Revolver Credit Agreement, secured by a first priority security interest in and lien on substantially all of the Reorganized Debtors' Assets, subject to customary limitations and exclusions.

"***Exit Revolver Credit Agreement***" means a Revolving Credit Agreement to be entered into by ModivCare, as borrower, and lenders to be determined, on or around the Effective Date, and which shall be for an amount of up to $250,000,000, with a sublimit for letters of credit of up to $150,000,000.

"***Exit Revolver Documents***" means the Exit Revolver Credit Agreement and any other agreement, document and/or instrument entered or entered into in connection with the Exit Revolver Credit Agreement.

"***Exit Term Loan Facility***" means the credit agreement to be entered into by the Reorganized Debtors for a takeback term loan facility with terms and conditions to be set forth in the Plan Supplement.

"***Exit Term Loans***" means the loans under the Exit Term Loan Facility.

"***Exit Term Loans Documents***" means the Exit Facility Term Credit Agreement and any other agreement, document and/or instrument entered into in connection with the Exit Term Loan Facility.

"***File***" or "***Filed***" or "***Filing***" means file, filed, or filing, respectively, with the Bankruptcy Court or its authorized designee in the Chapter 11 Cases.

"***Final DIP Order***" means the order entered by the Bankruptcy Court authorizing the Debtors to enter into the DIP Credit Agreement and approving, among other things, the DIP Facility and the Debtors' use of Cash Collateral, and the parties' rights with respect thereto on a final basis (as may be amended, supplemented or modified from time to time).

"***Final Order***" means as applicable, an order or judgment of the Bankruptcy Court, or other court of competent jurisdiction with respect to the relevant subject matter, which has not been reversed, stayed, modified, or amended, including any order subject to appeal but for which no stay of such order has been entered, and as to which the time to appeal, seek certiorari, or move for a new trial, reargument, or rehearing has expired and as to which no appeal, petition for certiorari, or other proceeding for a new trial, reargument, or rehearing has been timely taken, or as to which any appeal that has been taken or any petition for certiorari

that has been or may be Filed has been withdrawn with prejudice, resolved by the highest court to which the order or judgment was appealed or from which certiorari could be sought, or any request for new trial, reargument, or rehearing has been denied, resulted in no stay pending appeal or modification of such order, or has otherwise been dismissed with prejudice; *provided*, that no order or judgment shall fail to be a "Final Order" solely because of the possibility that a motion under rules 59 or 60 of the Federal Rules of Civil Procedure or any analogous Bankruptcy Rule (or any analogous rules applicable in another court of competent jurisdiction) or sections 502(j) or 1144 of the Bankruptcy Code has been or may be Filed with respect to such order or judgment.

"***First Lien Agent***" means JPMorgan Chase Bank, N.A., as administrative agent under the First Lien Credit Agreement or any successor agent duly appointed under the terms of the First Lien Credit Agreement.

"***First Lien Agent and Consenting Creditor Advisors***" means, collectively, Paul Hastings LLP and Lazard Freres & Co. LLC as, respectively, legal advisor and investment banker, to the First Lien Agent and the Consenting Creditors.

"***First Lien Claims***" means the First Lien Term Loan Claims, the First Lien RCF Claims, and the First Lien Incremental Claims.

"***First Lien Credit Agreement***" means that certain Credit Agreement, dated as of February 3, 2022, as amended, restated, amended and restated, supplemented, or otherwise modified from time to time, including by that certain Amendment No. 5 to the Credit Agreement, dated as of January 9, 2025, by and among ModivCare, the First Lien Lenders and the First Lien Agent comprising the First Lien RCF, the First Lien Incremental, and the First Lien Term Loans.

"***First Lien Credit Documents***" means the First Lien Credit Agreement together with all other related documents, instruments, and agreements, in each case, as supplemented, amended, restated, amended and restated, or otherwise modified from time to time.

"***First Lien Deficiency Claims***" means the portion of the First Lien Credit Agreement that is determined pursuant to section 506(a) of the Bankruptcy Code or similar provision to be unsecured.

"***First Lien Incremental***" means $78,750,000 in unpaid principal amount of term loans, plus accrued and unpaid interest, fees, costs, and expenses due January 2026 under the First Lien Credit Agreement.

"***First Lien Incremental Claim***" means any Claim on account of the First Lien Incremental, including accrued but unpaid interest thereon through the Petition Date.

"***First Lien Lenders***" means those certain lenders party to the First Lien Credit Agreement.

"***First Lien Loans***" means the First Lien RCF, the First Lien Incremental and the First Lien Term Loans.

"***First Lien RCF***" means the $325,000,000 in unpaid principal amount of revolving loans and LC Exposure (as defined in the First Lien Credit Agreement), plus accrued and unpaid interest, fees, costs, and expenses under the First Lien Credit Agreement.

"***First Lien RCF Claims***" means any Claim on account of the First Lien RCF, including accrued but unpaid interest thereon through the Petition Date.

"***First Lien Revolving LC Exposure***" means the LC Exposure comprising the undrawn amount of Letters of Credit which remain undrawn as of the Effective Date under the First Lien Credit Agreement.

"***First Lien Term Loan Claims***" means any Claim on account of the First Lien Term Loans, including accrued but unpaid interest thereon through the Petition Date.

"***First Lien Term Loans***" means $522,239,938 in unpaid principal amount of term loans, plus accrued and unpaid interest, fees, costs, and expenses due July 2031 under the First Lien Credit Agreement.

"***General Unsecured Claim***" means any Second Lien Claim and any prepetition Claim (other than First Lien Deficiency Claims and Subordinated Unsecured Notes Claims) against the Debtors that is not an Administrative Claim, Priority Tax Claim, First Lien Claim, Other Secured Claim, and Other Priority Claim.

"***Governmental Bar Date***" has the meaning set forth in the Claims Bar Date Order.

"***Governmental Unit***" means any supranational, national, state, municipal, local or foreign government, any court, tribunal, arbitrator or arbitral body (public or private), administrative agency, commission or other governmental official, authority or instrumentality (including any legislature, commission, regulatory administrative authority, governmental agency, bureau, branch or department).

"***GUC Cashout Value***" means $32,000,000. The GUC Cashout Value was determined based on the low end of equity value ($400 million) as per the Valuation Analysis attached as Exhibit E to the Disclosure Statement, with respect to both primary equity and the value of the New Warrants.

"***Holder***" means any Person that is the record or beneficial owner of any Claim or Interest, including any nominees, investment managers, investment advisors, sub-advisors, or managers of funds or discretionary accounts that hold, or trustees of trusts that hold, any Claim or Interest.

"***Impaired***" means, with respect to a Claim, Interest, or Class of Claims or Interests, "impaired" within the meaning of section 1124 of the Bankruptcy Code.

"***Indemnification Obligation***" means, collectively, any and all obligations of the Debtors pursuant to their corporate charters, bylaws, limited liability company agreements, memorandum and articles of association, or other organizational documents or agreements to indemnify all current and former officers, directors, agents or employees, in each case solely in their capacity as such, employed by the Debtors on and/or after the Petition Date.

"***Initial Consenting First Lien Lenders***" means those Initial Consenting First Lien Lenders as defined in the Restructuring Support Agreement.

"***Insured Claim***" means any Claim or portion of a Claim that is, or may be, insured under any insured policy.

"***Intercompany Claim***" means any Claim against a Debtor held by another Debtor.

"***Intercompany Interest***" means any Interest in a Debtor held by another Debtor.

"***Interest***" means any equity security (as defined in section 101(16) of the Bankruptcy Code) of the Debtors, including all shares (or any class thereof), common stock, preferred stock, limited liability company interests, membership interests, and any other equity, ownership, or profits interests of any

Debtor, and options, warrants, rights, stock appreciation rights, phantom units, incentives, restricted stock units, commitments, calls, redemption rights, repurchase rights, or other securities or arrangements, whether fully vested or vesting in the future, to acquire or subscribe for, or which are convertible into, or exercisable or exchangeable for the shares (or any class thereof) of, common stock, preferred stock, limited liability company interests, membership interests, or any other equity, ownership, or profits interests of any Debtor (in each case whether or not arising under or in connection with any employment agreement), excluding, for the avoidance of doubt, convertible debt securities.

"***Interim DIP Order***" means the *Interim 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* entered by the Bankruptcy Court at Docket No. 106 in the Chapter 11 Cases.

"***IRS***" means the Internal Revenue Service of the United States of America.

"***Lien***" has the meaning set forth in section 101(37) of the Bankruptcy Code.

"***Local Bankruptcy Rules***" means the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas.

"***Management Incentive Plan***" or "***MIP***" means the management incentive plan to be adopted by the New Board, which plan shall (a) reserve for certain employees, officers and directors of the Reorganized Parent eight percent (8%) of the New Common Interests on a fully-diluted basis, and (b) provide the quantum, form, terms, allocation, and vesting of all awards under the MIP in each case as determined by the New Board.

"***ModivCare***" means ModivCare Inc.

"***New Board***" means the initial composition of the board of directors or managers of Reorganized Parent, which shall consist of members appointed by a pre-emergence committee consisting of the Required Consenting First Lien Lenders who will be the largest holders of New Common Interests, in consultation with the Debtors, and disclosed in the Plan Supplement prior to emergence in accordance with section 1129(a)(5) of the Bankruptcy Code in the Plan Supplement.

"***New Corporate Governance Documents***" means the new Corporate Governance Documents of the Reorganized Debtors after giving effect to the Restructuring Transactions, as applicable, including any shareholders agreement, limited liability company agreement, or similar document.

"***New Common Interests***" means a single class of new common equity interests of Reorganized Parent to be issued (a) on the Effective Date or (b) as otherwise permitted pursuant to this Plan, the New Corporate Governance Documents and the New Common Interests Documents.

"***New Common Interests Documents***" means any and all documents required to implement, issue, or distribute the New Common Interests.

"***New Warrants***" means, collectively, the Series A Warrants, the Series B Warrants, and the Series C Warrants, each as defined in the New Warrants Term Sheet.

"***New Warrants Agreement***" means the form of warrant agreement governing New Warrants.

"***New Warrants Documents***" means the New Warrants, New Warrants Agreement and New Warrants Term Sheet, and any and all documents required to implement, issue, or distribute the New Warrants.

"***New Warrants Term Sheet***" means the term sheet attached as Annex 3 to the Restructuring Term Sheet describing the material terms of New Warrants.

"***Non-Debtor Affiliates***" means the Debtors' Affiliates that are not Debtors.

"***Non-Voting Class***" means each of: Class 1 (Other Secured Claims), Class 2 (Other Priority Claims), Class 6 (Intercompany Claims), Class 7 (Subordinated Claims), Class 8 (Intercompany Interests), and Class 9 (Existing Parent Equity Interests).

"***Other Priority Claim***" means any Claim, other than an Administrative Claim or a Priority Tax Claim, entitled to priority in right of payment under section 507(a) of the Bankruptcy Code.

"***Other Secured Claim***" means any secured claim that is not a First Lien Claim or Second Lien Claim.

"***Person***" means an individual, corporation, partnership, joint venture, association, joint stock company, limited liability company, limited liability partnership, trust, estate, unincorporated organization, Governmental Unit, or other Entity.

"***Petition Date***" means August 20, 2025.

"***Plan***" means this joint chapter 11 plan, including all appendices, exhibits, schedules, and supplements hereto (including any appendices, schedules, and supplements to this Plan contained in the Plan Supplement), as the same may be amended, supplemented, or modified from time to time in accordance with the provisions of the Bankruptcy Code and the terms hereof.

"***Plan Securities***" means, collectively, the New Common Interests, the New Warrants and any other Securities to be distributed and/or issued under this Plan (including any New Common Interests issued or issuable upon or on account of the Management Incentive Plan, the DIP Backstop Premium, the Equity Rights Offering, and/or the exercise of the New Warrants).

"***Plan Supplement***" means any supplemental appendix to this Plan containing certain documents and forms of documents, schedules, and exhibits relevant to the implementation of the Plan, as may be amended modified or supplemented from time to time in accordance with the terms of this Plan, and the Bankruptcy Code and the Bankruptcy Rules, which shall include, but shall not be limited to: (a) the New Corporate Governance Documents; (b) the New Common Interests Documents; (c) the New Warrants Documents; (d) the Exit Facilities Documents; (e) the Equity Rights Offering Documents; (f) the Schedule of Rejected Executory Contracts and Unexpired Leases; (g) any disclosures required under section 1129(a)(5) of the Bankruptcy Code (including, to the extent known and determined, a document disclosing the identity of the directors and officers of the Reorganized Debtors); (h) the Election Procedures; and (i) the Restructuring Transaction Steps Memorandum.

"***Prepetition Funded Debt Documents***" means, collectively, the First Lien Credit Documents, the Second Lien Notes Documents, and the Subordinated Unsecured Notes Indenture.

"***Priority Tax Claim***" means any Claim of a Governmental Unit of the kind specified in section 507(a)(8) of the Bankruptcy Code.

"***Pro Rata Share***" means, except as provided, with respect to any distribution on account of an Allowed Claim, a distribution equal in amount to the ratio (expressed as a percentage) that the amount of such Allowed Claim bears to the aggregate amount of all Allowed Claims in its Class.

"***Professional***" means an Entity: (a) employed pursuant to a Bankruptcy Court order in accordance with sections 327, 363, or 1103 of the Bankruptcy Code and to be compensated for services rendered before or on the Effective Date pursuant to sections 327, 328, 329, 330, 331, or 363 of the Bankruptcy Code; or (b) awarded compensation and reimbursement by the Bankruptcy Court pursuant to section 503(b)(4) of the Bankruptcy Code that are not Restructuring Expenses.

"***Professional Fee Claim***" means all Claims for fees and expenses (including transaction and success fees) incurred by a Professional on or after the Petition Date to the extent such fees and expenses have not been paid pursuant to an order of the Bankruptcy Court.

"***Professional Fee Claims Estimate***" has the meaning set forth in Article II, Section 2.6.

"***Professional Fee Escrow***" means an escrow account established and funded pursuant to Article II, Section 2.5 of this Plan.

"***Proof of Claim***" means a proof of Claim Filed against any of the Debtors in the Chapter 11 Cases.

"***Reinstatement***" or "***Reinstated***" or "***Reinstate***" means, with respect to Claims and Interests, that the Claim or Interest shall be rendered Unimpaired in accordance with section 1124 of the Bankruptcy Code.

"***Related Fund***" means, with respect to any Holder of Allowed Claims, any Affiliates (including at the institutional level) of such Holder or any fund, account (including any separately managed accounts) or investment vehicle that is controlled, managed, advised or sub-advised by such Holder, an Affiliate of such Holder, or by the same investment manager, advisor or subadvisor as such Holder.

"***Related Parties***" means with respect to a Person, that Person's current and former affiliates, and such Person's and its current and former affiliates' current and former directors, managers, officers, equity holders (regardless of whether such interests are held directly or indirectly), affiliated investment funds or investment vehicles, predecessors, participants, successors, and assigns, subsidiaries, and each of their respective current and former equity holders, officers, directors, managers, principals, members, employees, agents, fiduciaries, trustees, advisory board members, financial advisors, limited partners, general partners, attorneys, accountants, managed accounts or funds, management companies, fund advisors, investment bankers, consultants, investment managers, investment advisors, representatives, and other professionals, and such Person's respective heirs, executors, estates, and nominees, each in their capacity as such.

"***Release Opt-Out Form***" means the form to be provided to Holders (other than Debtors or Non-Debtor Affiliates) of Claims and Interests in the Non-Voting Classes through which such Holders may elect to affirmatively opt out of the Third-Party Release.

"***Released Parties***" means, collectively, each of: (a) the Debtors; (b) the Reorganized Debtors; (c) the Consenting Creditors, (d) the First Lien Agent; (e) the DIP Lenders; (f) the DIP Backstop Commitment Parties; (g) the DIP Agent; (h) the Second Lien Notes Trustee; (i) each Holder of a Claim in a Voting Class that does not affirmatively elect to "opt out" of the Third-Party Releases as provided on its respective ballot; (j) each Holder of a Claim or Interest in a Non-Voting Class that does not affirmatively elect to "opt out" of the Third-Party Releases as provided on its respective Release Opt-Out Form; and (k)

with respect to each of the foregoing persons in clauses (a) through (j), each Related Party, solely to the extent such Related Party would be liable whether directly or under principles of agency for any such Claims or Causes of Action asserted against the applicable Entity in the foregoing clauses (a) through (j) to whom they are related. Notwithstanding the foregoing, any Person that opts out of the releases set forth in the Plan shall not be deemed a "Released Party" hereunder; *provided*, that any Holder of a Claim or Interest that timely objects to the Third-Party Release, either through (i) a formal objection Filed on the docket of the Chapter 11 Cases, or (ii) an informal objection provided to the Debtors by electronic mail, and such objection is not withdrawn on the docket of the Chapter 11 Cases or via electronic mail, as applicable, before or at the Confirmation Hearing (and in the case of the latter on the record), shall not be a "Released Party" hereunder; *provided, further*, any Person or Entity (and each such Person or Entity's Related Parties) that files an objection with the Bankruptcy Court to any substantive pleading in the Chapter 11 Cases, including to approval of the DIP Facility or the confirmation of this Plan, or commences any Cause of Action in the Bankruptcy Court or any other court of competent jurisdiction against any director of the Debtors, or against any Consenting Creditor relating to such Consenting Creditor's secured Claims, shall not be a Released Party.

"***Releases***" means, collectively, the releases set forth in Article X, Section 10.6.

"***Releasing Parties***" means, collectively, each of, and in each case in its capacity as such: (a) each Debtor; (b) each Reorganized Debtor; (c) the Consenting Creditors; (d) the First Lien Agent; (e) the DIP Lenders; (f) the DIP Backstop Commitment Parties; (g) the DIP Agent; (h) the Second Lien Notes Trustee; (i) [reserved]; (j) each Holder of a Claim in a Voting Class that does not affirmatively elect to "opt out" of the Third-Party Release as provided on its respective ballot; (k) each Holder of a Claim or Interest in a Non-Voting Class that does not affirmatively elect to "opt out" of the Third-Party Release as provided on its respective Release Opt-Out Form; (l) each Related Party of each Entity in clauses (a) through (k), solely to the extent such Related Party (I) would be obligated to grant a release under principles of agency if it were so directed by the Entity in the foregoing clauses (a) through (k) to whom they are related or (II) may assert Claims or Causes of Action on behalf of or in a derivative capacity by or through an Entity in clause (a) through (i); *provided*, that, any Holder of a Claim or Interest that timely objects to the Third-Party Release, either through (i) a formal objection Filed on the docket of the Chapter 11 Cases or (ii) an informal objection provided to the Debtors by electronic mail, and such objection is not withdrawn on the docket of the Chapter 11 Cases or via electronic mail, as applicable, before the Confirmation Hearing, shall not be a "Releasing Party;" *provided, further,* that the Second Lien Notes Trustee and the First Lien Agent shall be Releasing Parties solely in their respective capacities as Second Lien Notes Trustee and the First Lien Agent and not individually or in any other capacity.

"***Reorganized Debtors***" means a Debtor, or any successor or assign thereto, by merger, consolidation, reorganization, or otherwise, in the form of a corporation, limited liability company, partnership, or other form, as the case may be, on and after the Effective Date, including Reorganized Parent.

"***Reorganized Parent***" means, from and after the Effective Date, ModivCare or such other Entity as may be determined by the Debtors and the Required Consenting First Lien Lenders, to be the Debtors' new corporate parent, as reorganized pursuant to the Plan or as otherwise agreed between the Debtors and the Required Consenting First Lien Lenders.

"***Required Consenting Creditors***" means, collectively, the Required Consenting First Lien Lenders and the Required Consenting Second Lien Noteholders.

"***Required Consenting First Lien Lenders***" means, as of any date of determination, the Consenting First Lien Lenders holding at least 50.1% in aggregate principal amount outstanding of the First Lien Claims held by all of the Consenting First Lien Lenders as of such date.

"***Required Consenting Second Lien Noteholders***" means, as of any date of determination, the Consenting Second Lien Noteholders holding at least 50.1% in aggregate principal amount outstanding of the Second Lien Claims held, beneficially owned, or managed by all of the Consenting Second Lien Noteholders as of such date.

"***Restructuring Expenses***" means (a) all reasonable and documented fees, costs, and expenses of each of the First Lien Agent and Consenting Creditor Advisors, in each case: (i) in connection with the negotiation, formulation, preparation, execution, delivery, implementation, consummation and/or enforcement this Plan, the other Definitive Documents, the Restructuring Transactions, and the transactions contemplated hereby and thereby; and (ii) as otherwise provided under the First Lien Credit Documents, or engagement letters or fee reimbursement letters entered into between the applicable Debtors, on the one hand, and any First Lien Agent and Consenting Creditor Advisor, on the other hand, with respect to the fees, costs, and expenses of any First Lien Agent and Consenting Creditor Advisor and (b) the Second Lien Notes Trustee Fees and Expenses.

"***Restructuring Support Agreement***" means that certain Restructuring Support Agreement, dated as of August 20, 2025, by and among the Debtors and the Consenting Creditors, including all exhibits, annexes, and schedules attached thereto (as may be amended, supplemented or modified, in accordance with the terms thereof, from time to time prior to the date hereof).

"***Restructuring Term Sheet***" means that certain Restructuring Term Sheet attached as Exhibit A to the Restructuring Support Agreement.

"***Restructuring Transaction Steps Memorandum***" means the document setting forth the sequence of certain Restructuring Transactions.

"***Restructuring Transactions***" means the transactions set forth in Article V, Section 5.1.

"***Schedule of Rejected Executory Contracts and Unexpired Leases***" means the schedule of Executory Contracts and Unexpired Leases to be rejected by the Debtors pursuant to this Plan, if any, and to be included in the Plan Supplement, as the same may be amended, modified, or supplemented from time to time.

"***Schedule of Retained Causes of Action***" means a schedule of Causes of Action to be retained by the Reorganized Debtors as set forth in the Plan Supplement.

"***Second Lien Claim***" means any Claim on account of the Second Lien Notes or otherwise arising under the Second Lien Notes Documents, including accrued but unpaid interest, fees, costs and expenses.

"***Second Lien Notes***" means those certain Notes, as defined in and issued pursuant to the Second Lien Notes Indenture.

"***Second Lien Notes Documents***" means the Second Lien Notes Indenture and the Second Lien Notes, together with all other related documents, instruments, notes, certificates, and agreements, in each case, as supplemented, amended, restated, amended and restated, or otherwise modified from time to time.

"***Second Lien Notes Indenture***" means that certain Second Lien Senior Secured PIK Toggle Notes Indenture, dated as of March 7, 2025 by and between ModivCare, the guarantors party thereto from time to time, the Second Lien Notes Trustee and the Notes Collateral Agent (as defined therein), as amended, restated, amended and restated, supplemented or otherwise modified from time to time prior to the Petition Date.

"***Second Lien Notes Trustee***" means Ankura Trust Company, LLC, in its capacity as trustee under the Second Lien Notes Indenture, or any successor trustee duly appointed under the terms of the Second Lien Notes Indenture.

"***Second Lien Notes Trustee Charging Lien***" means any Lien or other priority of payment to which the Second Lien Notes Trustee is entitled under the Second Lien Notes Documents, against distributions to be made to Holders of Second Lien Claims, for payment of any Second Lien Notes Trustee Fees and Expenses.

"***Second Lien Notes Trustee Fees and Expenses***" means all reasonable and documented fees, costs, and expenses of the Second Lien Notes Trustee, arising under or in connection with the Second Lien Notes Documents, including in its capacity as Notes Collateral Agent (as defined in the Second Lien Notes Indenture).

"***Secured Claim***" means a Claim (a) secured by a Lien on Collateral to the extent of the value of such Collateral as (i) set forth in this Plan, (ii) agreed to by the Holder of such Claim and the Debtors, or (iii) determined by a Final Order in accordance with section 506(a) of the Bankruptcy Code exceeds the value of the Claim, or (b) secured by the amount of any right of setoff of the Holder thereof in accordance with section 553 of the Bankruptcy Code; *provided*, that, nothing in this definition shall alter the terms of any subordination pursuant to section 510 of the Bankruptcy Code.

"***Securities Act***" the Securities Act of 1933, as amended.

"***Security***" or "***Securities***" means any instruments that qualify as a "security" under Section 2(a)(1) of the Securities Act.

"***Solicitation Packages***" means materials used in connection with the solicitation of votes on the Plan, including the Disclosure Statement, and any procedures established by the Bankruptcy Court with respect to solicitation of votes on the Plan.

"***Solicitation Procedures Order***" means the order of the Bankruptcy Court approving the Disclosure Statement, solicitation procedures and the Solicitation Packages, and scheduling the Confirmation Hearing.

"***Subordinated Claims***" means any claim subject to subordination under section 510 of the Bankruptcy Code, other than the Subordinated Unsecured Notes Claims. Notwithstanding anything to the contrary outside of this definition in the Plan, any Claim that satisfies the definition of a Subordinated Claim shall be a Subordinated Claim notwithstanding that such Claim would otherwise satisfy the definition of another type of Claim.

"***Subordinated Unsecured Notes***" means those certain 5.000% senior Subordinated Unsecured Notes due October 1, 2029, issued pursuant to the Subordinated Unsecured Notes Indenture.

"***Subordinated Unsecured Notes Claims***" means any Claim on account of the Subordinated Unsecured Notes, including accrued but unpaid interest thereon through the Petition Date.

"***Subordinated Unsecured Notes Indenture***" means that certain that certain Senior Notes Indenture, dated as of August 24, 2021 (as amended, restated, amended and restated, supplemented, or otherwise modified from time to time), by and between ModivCare, as issuer, and the Subordinated Unsecured Notes Trustee (defined below) pursuant to which ModivCare issued the Subordinated Unsecured Notes in the aggregate principal amount of $228,835,000.

"***Subordinated Unsecured Notes Subordination Agreement***" Subordination Agreement dated as of March 7, 2025 by and among JP Morgan Chasebank, N.A., Ankura Trust Company LLC and Wilmington Savings Fund Society, FSB pursuant to which, among other things, the Subordinated Unsecured Notes Claims are subordinated in right of payment to the First Lien Term Loan Claims and Second Lien Claims.

"***Subordinated Unsecured Notes Trustee***" means Wilmington Saving Fund Society, FSB (as successor to The Bank of New York Mellon Trust Company, N.A.) or any successor trustee duly appointed under the terms of the Subordinated Unsecured Notes Indenture.

"***Subsequent Condition***" shall have the meaning ascribed to such term in Article IX, Section 9.2 herein.

"***Third-Party Release***" means the releases given by the Releasing Parties to the Released Parties in Article X, Section 10.6(b).

"***Unexpired Lease***" means a lease to which one or more of the Debtors is a party that is subject to assumption or rejection under section 365 of the Bankruptcy Code.

"***Unimpaired***" means, with respect to a Class of Claims or Interests, a Class of Claims or Interests that is unimpaired within the meaning of section 1124 of the Bankruptcy Code.

"***Voting Classes***" means, collectively, Class 3 (First Lien Claims), Class 4 (General Unsecured Claims), and Class 5 (Subordinated Unsecured Notes Claims).

B. Interpretation; Application of Definitions and Rules of Construction.

Unless otherwise specified, all section or exhibit references in this Plan are to the respective section in, or exhibit to, this Plan, as the same may be amended, waived, or modified from time to time. The words "herein," "hereof," "hereto," "hereunder," and other words of similar import refer to this Plan as a whole and not to any particular section, subsection, or clause contained therein and have the same meaning as "in this Plan," "of this Plan," "to this Plan," and "under this Plan," respectively. The words "includes" and "including" are not limiting and shall be deemed to be followed by the words "without limitation." The headings in this Plan are for convenience of reference only and shall not limit or otherwise affect the provisions hereof. For purposes herein: (a) in the appropriate context, each term, whether stated in the singular or plural, shall include both the singular and plural, and pronouns stated in the masculine, feminine, or neuter gender shall include the masculine, feminine, and the neuter gender; (b) any reference herein to a contract, lease, instrument, release, indenture, or other agreement or document being in a particular form or on particular terms and conditions means that the referenced document shall be substantially in that form or substantially on those terms and conditions; (c) unless otherwise specified herein, all references herein to "Articles" are references to Articles hereof or hereto; (d) the rules of construction set forth in section 102 of the Bankruptcy Code shall apply; (e) any term used in capitalized form herein that is not otherwise defined but that is used in the Bankruptcy Code or the Bankruptcy Rules shall have the meaning assigned to that term in the Bankruptcy Code or the Bankruptcy Rules, as the case may be; (f) any docket number references in this Plan shall refer to the docket number of any document Filed with the Bankruptcy Court in the Chapter 11 Cases; (g) references to "shareholders," "directors,"

and/or "officers" shall also include "members" and/or "managers," as applicable, as such terms are defined under the applicable state limited liability company laws; (h) except as otherwise provided herein, any reference to a document or agreement that is to be issued or entered into that is dependent on an election to be made pursuant to this Plan or an event occurring shall be deemed to be followed by the words "if applicable"; (i) any immaterial effectuating provisions may be interpreted by the Debtors, or after the Effective Date, the Reorganized Debtors, in such a manner that is consistent with the overall purpose and intent of this Plan all without further notice to or action, order, or approval of the Bankruptcy Court or any other Entity; *provided*, that any effectuating provision that has an economic impact will not be considered "immaterial"; and (j) except as otherwise provided, any references to the Effective Date shall mean the Effective Date or as soon as reasonably practicable thereafter. To the extent that the treatment, allowance, or disallowance of any Claim herein is interpreted as a Claim objection, this Plan shall be deemed a Claim objection to such Claim.

C. Computation of Time.

Unless otherwise specifically stated herein, the provisions of Bankruptcy Rule 9006(a) shall apply in computing any period of time prescribed or allowed herein. If the date on which a transaction may occur pursuant to this Plan shall occur on a day that is not a Business Day, then such transaction shall instead occur on the next Business Day but shall be deemed to have been completed as of the required date.

D. Reference to Monetary Figures.

All references in this Plan to monetary figures shall refer to the legal tender of the United States of America, unless otherwise expressly provided.

E. Reference to the Debtors or the Reorganized Debtors.

Except as otherwise specifically provided in this Plan to the contrary, references in this Plan to the Debtors or the Reorganized Debtors shall have the meaning ascribed to them in Article I, to the extent the context requires.

F. Controlling Document.

In the event of an inconsistency between this Plan and the Plan Supplement, the terms of the relevant document in the Plan Supplement shall control (unless stated otherwise in such Plan Supplement document or the Confirmation Order). In the event of an inconsistency between this Plan and any other instrument or document created or executed pursuant to this Plan, or between this Plan and the Disclosure Statement, this Plan shall control. The provisions of this Plan and of the Confirmation Order shall be construed in a manner consistent with each other so as to effectuate the purposes of each; *provided*, that if there is determined to be any inconsistency between any Plan provision and any provision of the Confirmation Order that cannot be so reconciled, then, solely to the extent of such inconsistency, the provisions of the Confirmation Order shall govern and any such provision of the Confirmation Order shall be deemed a modification of this Plan.

G. Consultation, Notice, Information and Consent Rights.

Notwithstanding anything herein to the contrary, any and all consultation, information, notice, and consent rights of the parties to the Restructuring Support Agreement, the DIP Documents, as applicable, and as respectively set forth therein and in the DIP Orders, shall be incorporated herein by reference (including to the applicable definitions in Article I.A) and fully enforceable as if stated in full herein. In the case of conflict with respect to consultation, information, notice, and consent rights between the

Restructuring Support Agreement, on the one hand, and the Plan, on the other, the Restructuring Support Agreement shall control and govern.

ARTICLE II.

ADMINISTRATIVE, PRIORITY TAX, DIP CLAIMS, AND PROFESSIONAL FEE CLAIMS

2.1. ***Administrative Claims***.

Except to the extent that a Holder of an Allowed Administrative Claim agrees to different treatment, each Holder of an Allowed Administrative Claim (other than a Professional Fee Claim) shall receive, in full and final satisfaction of such Allowed Administrative Claim, (i) Cash in an amount equal to such Allowed Administrative Claim on the Effective Date or as soon as practicable thereafter or (ii) such other treatment consistent with the provisions of section 1129(a)(9) of the Bankruptcy Code and as agreed to by the Debtors; *provided*, that Allowed Administrative Claims representing liabilities incurred in the ordinary course of business by the Debtors, as debtors in possession (and excluding, for the avoidance of doubt, the DIP Backstop Premium), shall be paid by the Debtors or the Reorganized Debtors, as applicable, in the ordinary course of business, consistent with past practice and in accordance with the terms and subject to the conditions of any orders, course of dealing or agreements governing, instruments evidencing, or other documents relating to such transactions.

2.2. ***Priority Tax Claims***.

Except to the extent that a Holder of an Allowed Priority Tax Claim agrees to less favorable treatment, on the earlier of (a) the Effective Date, to the extent such Claim is an Allowed Priority Tax Claim on the Effective Date, (b) the first Business Day after the date that is thirty (30) calendar days after the date such Priority Tax Claim becomes an Allowed Priority Tax Claim, or (c) the date such Allowed Priority Tax Claim is due and payable in the ordinary course, each Holder of an Allowed Priority Tax Claim shall receive, in full and final satisfaction, settlement, release and discharge of, and in exchange for, such Allowed Priority Tax Claim, at the sole option of the Debtor or the Reorganized Debtors, as applicable, (i) Cash in an amount equal to such Allowed Priority Tax Claim or (ii) treatment consistent with the provisions of section 1129(a)(9) of the Bankruptcy Code; *provided*, that the Debtors and the Reorganized Debtors, as applicable, reserve the right to prepay all or a portion of any such amounts at any time under this option without penalty or premium.

2.3. ***Restructuring Expenses***.

The Restructuring Expenses incurred, or estimated to be incurred up to and including the Effective Date (or, with respect to necessary post-Effective Date activities, after the Effective Date), shall be paid in full in Cash on the Effective Date or as soon as reasonably practicable (to the extent not previously paid during the course of the Chapter 11 Cases, on the dates on which such amounts would be required to be paid under the DIP Orders or the Restructuring Support Agreement, as applicable) in accordance with, and subject to, the terms of the Restructuring Support Agreement, without any requirement to File any Proof of Claim, a fee application with the Bankruptcy Court, a request for payment of Administrative Claim, or any other pleading or document in the Chapter 11 Cases, without the need for itemized time detail, or without any requirement for Bankruptcy Court review or approval. All Restructuring Expenses to be paid on the Effective Date shall be estimated prior to and as of the Effective Date and such estimates shall be delivered to the Debtors at least five (5) calendar days before the anticipated Effective Date; *provided*, that such estimates shall not be considered an admission or limitation with respect to such Restructuring Expenses.

On the Effective Date, or as soon as practicable thereafter, final invoices for all Restructuring Expenses incurred prior to and as of the Effective Date shall be submitted to the Debtors.

If the Debtors or the Reorganized Debtors, as applicable, dispute any requested Second Lien Notes Trustee Fees and Expenses, the Debtors or the Reorganized Debtors, as applicable, shall (1) pay the undisputed portion of the Second Lien Notes Trustee Fees and Expenses and (2) notify the Second Lien Notes Trustee in writing of such dispute within two Business Days after presentment of the invoices by the Second Lien Notes Trustee. Upon such notification, the Second Lien Notes Trustee may assert its Second Lien Notes Trustee Charging Lien to pay the disputed portion of its Second Lien Notes Trustee Fees and Expenses or submit such dispute for resolution by the Bankruptcy Court; *provided*, *however*, that the Bankruptcy Court's review shall be limited to a determination under the reasonableness standard in accordance with the Second Lien Notes Indenture. Nothing herein shall in any way affect or diminish the right of the Second Lien Notes Trustee to exercise its Second Lien Notes Trustee Charging Lien against distributions on account of the Second Lien Claims with respect to any unpaid Second Lien Notes Trustee Fees and Expenses, as applicable.

Payment of the fees and expenses of the First Lien Agent and the Second Lien Notes Trustee as Restructuring Expenses and their inclusion as Released Parties is being provided to each in consideration of the agreement of each of the First Lien Agent and the Second Lien Notes Trustee to waive their respective charging lien rights against distributions under their respective Prepetition Funded Debt Documents.

2.4. ***Professional Fee Claims***.

All Professionals seeking approval by the Bankruptcy Court of Professional Fee Claims shall (i) File, on or before the date that is forty-five (45) days after the Effective Date (unless extended by the Reorganized Debtors), their respective applications for final allowances of compensation for services rendered and reimbursement of expenses incurred and (ii) be paid in full, in Cash, in such amounts as are Allowed by the Bankruptcy Court or authorized to be paid in accordance with the order(s) relating to or allowing any such Professional Fee Claims.

2.5. ***Professional Fee Escrow***.

(a) As soon as reasonably practicable after the Confirmation Date and no later than the Effective Date, the Debtors shall establish and fund the Professional Fee Escrow with Cash equal to the Professional Fee Claims Estimate. No Liens, Claims, or Interests shall encumber the Professional Fee Escrow or Cash held in the Professional Fee Escrow in any way. Subject to the DIP Orders, the Professional Fee Escrow (including funds held in the Professional Fee Escrow) (i) shall not be and shall not be deemed property of the Debtors, their Estates, or the Reorganized Debtors, and (ii) shall be held in trust for the Professionals; *provided*, that funds remaining in the Professional Fee Escrow after all Allowed Professional Fee Claims have been irrevocably paid in full in cash pursuant to one or more Final Orders of the Bankruptcy Court shall revert to the Reorganized Debtors. Allowed Professional Fee Claims shall be paid in Cash to such Professionals from funds held in the Professional Fee Escrow when such Claims are Allowed by an order of the Bankruptcy Court; *provided*, that the Debtors' obligations with respect to Professional Fee Claims shall not be limited nor deemed to be limited in any way to the balance of funds held in the Professional Fee Escrow.

(b) If the amount of funds in the Professional Fee Escrow is insufficient to fund payment in full of all Allowed Professional Fee Claims and any other Allowed amounts owed to Professionals, the deficiency shall be promptly, and, in any event, by no later than five (5) Business Days of the Debtors or the Reorganized Debtors, as applicable, being alerted to such deficiency, funded in Cash

to the Professional Fee Escrow from the Debtors' Estates or Reorganized Debtors, as applicable, without any further action or order of the Bankruptcy Court.

(c) Any objections to Professional Fee Claims shall be served and Filed no later than twenty-one (21) days after Filing of the final applications for compensation or reimbursement.

2.6. ***Professional Fee Claims Estimate***.

Each Professional shall estimate in good faith its unpaid Professional Fee Claim and other unpaid fees and expenses incurred in rendering services to the Debtors, before and as of the Effective Date and shall deliver such reasonable, good faith estimate to the Debtors no later than five (5) Business Days prior to the Effective Date (such estimate the "***Professional Fee Claims Estimate***"); *provided*, that such estimate shall not limit, nor shall it be construed as limiting, the amount of the fees and expenses that are the subject of the Professional's final request for payment of Filed Professional Fee Claims. If a Professional does not provide an estimate, the Debtors shall estimate in good faith the unpaid and unbilled fees and expenses of such Professional. The total aggregate amount so estimated to be outstanding as of the anticipated Effective Date shall be utilized by the Debtors to determine the amount to be funded to the Professional Fee Escrow; *provided*, that the Reorganized Debtors shall use Cash on hand to increase the amount of the Professional Fee Escrow to the extent fee applications are Filed after the Effective Date in excess of the amount held in the Professional Fee Escrow based on such estimates.

2.7. ***DIP Backstop Premium***.

On the Effective Date, the DIP Backstop Premium shall be paid in accordance with the terms of the DIP Backstop Commitment Letters and this Plan.

2.8. ***DIP Claims***.

Notwithstanding anything to the contrary herein and except to the extent that a Holder of an Allowed DIP Claim agrees to less favorable treatment, each Holder of an Allowed DIP Claim shall receive, in full and final satisfaction, settlement, release, and discharge of such Claim, its Pro Rata Share of Exit Term Loans, including, for the avoidance of doubt, DIP Professional Fees and Restructuring Fees and Expenses, which shall be paid in full in cash in accordance with the terms of the DIP Orders and the Plan, as applicable.

2.9. ***Post-Confirmation Date Fees and Expenses***.

(a) Except as otherwise specifically provided in this Plan, on and after the Confirmation Date, the Debtors or Reorganized Debtors, as applicable, may, in the ordinary course of business and without any further notice to or action, order, or approval of the Bankruptcy Court, pay in Cash all reasonable and documented legal, professional, or other fees and expenses related to implementation of this Plan incurred by the Debtors or the Reorganized Debtors, as applicable.

(b) Upon and following the Confirmation Date, any requirement that Professionals comply with sections 327 through 331, 363, and 1103 of the Bankruptcy Code in seeking retention for services rendered after such date shall terminate, and the Debtors or the Reorganized Debtors, as applicable, may employ any Professional in the ordinary course of business without any further notice to or action, order, or approval of the Bankruptcy Court.

ARTICLE III.

CLASSIFICATION OF CLAIMS AND INTERESTS.

3.1. ***Classification in General***.

A Claim or Interest is placed in a particular Class for all purposes, including voting, confirmation, and distribution under this Plan and under sections 1122 and 1123(a)(1) of the Bankruptcy Code; *provided*, that a Claim or Interest is placed in a particular Class for the purpose of receiving distributions pursuant to this Plan only to the extent that such Claim or Interest is an Allowed Claim or Allowed Interest in that Class and such Claim or Interest has not been satisfied, released, or otherwise settled prior to the Effective Date. All of the potential Classes for the Debtors are set forth herein. Certain Debtors may not have any Holders of Claims or Interests in a particular Class or Classes, and such Claims or Interests shall be treated as set forth in Article III, Section 3.5 herein.

In accordance with section 1123(a)(1) of the Bankruptcy Code, the Debtors have not classified Administrative Claims, Priority Tax Claims, and DIP Claims, as described in Article II herein.

Other than with respect to Debtor ModivCare, the Debtors shall be substantively consolidated solely for the purposes of voting, determining which Class or Classes have accepted the Plan, confirming the Plan, and the resulting treatment of all Claims and Interests and Plan distributions.

3.2. ***Formation of Debtor Groups for Convenience Only***.

This Plan groups the Debtors together solely for the purpose of describing treatment under this Plan, confirmation of this Plan, and making distributions in respect of Claims and Interests under this Plan. Such groupings shall not affect any Debtor's status as a separate legal Entity, change the organizational structure of the Debtors' business enterprise, constitute a change of control of any Debtor for any purpose, cause a merger or consolidation of any legal Entities, or cause the transfer of any Assets; and, except as otherwise provided by or permitted under this Plan, all Debtors shall continue to exist as separate legal Entities after the Effective Date.

3.3. ***Summary of Classification***.

The following table designates the Classes of Claims against and Interests in each of the Debtors and specifies which of those Classes are (a) Impaired or Unimpaired by this Plan, (b) entitled to vote to accept or reject this Plan in accordance with section 1126 of the Bankruptcy Code, and (c) presumed to accept or deemed to reject this Plan. In accordance with section 1123(a)(1) of the Bankruptcy Code, Administrative Claims, DIP Claims (including the DIP Backstop Premium), Priority Tax Claims, and

Restructuring Expenses have not been classified. The classification of Claims and Interests set forth herein shall apply separately to each Debtor.

Class	Designation	Treatment	Entitled to Vote
1	Other Secured Claims	Unimpaired	No (Presumed to Accept)
2	Other Priority Claims	Unimpaired	No (Presumed to Accept)
3	First Lien Claims	Impaired	Yes
4	General Unsecured Claims	Impaired	Yes
5	Subordinated Unsecured Notes Claims	Impaired	Yes
6	Intercompany Claims	Unimpaired	No (Presumed to Accept)
7	Subordinated Claims	Impaired	No (Deemed to Reject)
8	Intercompany Interests	Unimpaired	No (Presumed to Accept)
9	Existing Parent Equity Interests	Impaired	No (Deemed to Reject)

3.4. ***Special Provision Governing Unimpaired Claims***.

Except as otherwise provided in this Plan, nothing under this Plan shall affect, diminish, or impair the rights of the Debtors or the Reorganized Debtors, as applicable, in respect of any Unimpaired Claims, including all rights in respect of legal and equitable defenses to, or setoffs or recoupments against, any such Unimpaired Claims; and, except as otherwise specifically provided in this Plan, nothing herein shall be deemed to be a waiver or relinquishment of any Claim, Cause of Action, right of setoff, or other legal or equitable defense that the Debtors had immediately prior to the Petition Date, against or with respect to any Claim that is Unimpaired (including, for the avoidance of doubt, any Claim that is Reinstated) by this Plan. Except as otherwise specifically provided in this Plan, the Reorganized Debtors shall have, retain, reserve, and be entitled to assert all such Claims, Causes of Action, rights of setoff, and other legal or equitable defenses that the Debtors had immediately prior to the Petition Date fully as if the Chapter 11 Cases had not been commenced, and all of the Reorganized Debtors' legal and equitable rights with respect to any Reinstated Claim or Claim that is otherwise Unimpaired by this Plan may be asserted after the Confirmation Date and the Effective Date to the same extent as if the Chapter 11 Cases had not been commenced.

3.5. ***Elimination of Vacant Classes***.

Any Class of Claims or Interests that, as of the commencement of the Confirmation Hearing, does not have at least one Holder of a Claim or Interest that is Allowed, or temporarily Allowed under Bankruptcy Rule 3018, in an amount greater than zero for voting purposes shall be considered vacant,

deemed eliminated from this Plan for purposes of determining acceptance or rejection of this Plan pursuant to section 1129(a)(8) of the Bankruptcy Code with respect to that Class.

3.6. ***No Waiver***.

Nothing contained in this Plan shall be construed to waive a Debtor's or other Person's right to object on any basis to any Disputed Claim.

3.7. ***Voting Classes***.

Classes 3, 4, and 5 are Impaired under this Plan. The Holders of Claims in such Classes as of the Voting Record Date are entitled to vote to accept or reject this Plan.

3.8. ***Presumed Acceptance of this Plan***.

If a Class contains Claims or Interests eligible to vote and no Holders of Claims or Interests eligible to vote in such Class vote to accept or reject this Plan, this Plan shall be presumed accepted by such Class.

Classes 1, 2, 6, and 8 are Unimpaired under this Plan. Therefore, the Holders of Claims or Interests in such Classes are presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code and are not entitled to vote to accept or reject this Plan.

3.9. ***Deemed Rejection of this Plan***.

Classes 7 and 9 are Impaired and Holders of Subordinated Claims and Existing Parent Equity Interests in such Classes shall receive no distribution under this Plan on account of such Claims or Interests, as applicable. Therefore, the Holders of Subordinated Claims and Existing Parent Equity Interests are deemed to have rejected this Plan pursuant to section 1126(g) of the Bankruptcy Code and are not entitled to vote to accept or reject this Plan. Such Holders will, however, receive a Release Opt-Out Form to allow such Holders to affirmatively opt-out of the Third-Party Release.

3.10. ***Confirmation Pursuant to Sections 1129(a)(10) and 1129(b) of the Bankruptcy Code***.

Section 1129(a)(10) of the Bankruptcy Code shall be satisfied for purposes of Confirmation by acceptance of this Plan by any of the Voting Classes. The Debtors shall seek Confirmation of this Plan under section 1129(b) of the Bankruptcy Code with respect to any Impaired Class that does not accept this Plan. The Debtors reserve the right to modify this Plan or any Exhibit or the Plan Supplement in order to satisfy the requirements of section 1129(b) of the Bankruptcy Code, if necessary.

ARTICLE IV.

TREATMENT OF CLAIMS AND INTERESTS.

4.1. ***Other Secured Claims (Class 1)***.

(a) *Classification*: Class 1 consists of Other Secured Claims.

(b) *Treatment*: The legal, equitable, and contractual rights of Holders of Allowed Other Secured Claims are unaltered by this Plan. On or as soon as reasonably practicable after the Effective Date, except to the extent that a Holder of an Allowed Other Secured Claim agrees to less favorable treatment of its Allowed Other Secured Claim, in full and final satisfaction, settlement, release, and

discharge and in exchange for each Allowed Other Secured Claim, at the option of the Debtors (with the consent of the Required Consenting First Lien Lenders) or the Reorganized Debtors, (i) such Holder shall receive payment in full in Cash, payable on the later of the Effective Date and the date that is ten (10) Business Days after the date on which such Other Secured Claim becomes an Allowed Other Secured Claim, in each case, or as soon as reasonably practicable thereafter or (ii) such Holder shall receive such other treatment so as to render such holder's Allowed Other Secured Claim Unimpaired.

(c) *Impairment and Voting*: Class 1 is Unimpaired, and the Holders of Other Secured Claims are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Other Secured Claims are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to such Other Secured Claims. Holders of Other Secured Claims shall be provided a Release Opt-Out Form solely for the purpose of enabling such Holders of Other Secured Claims to affirmatively opt-out of the Third-Party Release.

4.2. ***Other Priority Claims (Class 2)***.

(a) *Classification*: Class 2 consists of Other Priority Claims.

(b) *Treatment*: The legal, equitable, and contractual rights of the Holders of Allowed Other Priority Claims are unaltered by this Plan. On or as soon as reasonably practicable after the Effective Date, except to the extent that a holder of an Allowed Other Priority Claim agrees to less favorable treatment, in full and final satisfaction, settlement, release, and discharge and in exchange for each Allowed Other Priority Claim, each holder of an Allowed Other Priority Claim shall, at the option of the Debtors (with the consent of the Required Consenting First Lien Lenders) or the Reorganized Debtors, (i) be paid in full in Cash or (ii) otherwise receive treatment consistent with the provisions of section 1129(a)(9) of the Bankruptcy Code, payable on the later of the Effective Date and the date that is ten (10) Business Days after the date on which such Other Priority Claim becomes an Allowed Other Priority Claim, in each case, or as soon as reasonably practicable thereafter.

(c) *Impairment and Voting*: Class 2 is Unimpaired, and the Holders of Other Priority Claims are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Other Priority Claims are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to Other Priority Claims. Holders of Other Priority Claims shall be provided a Release Opt-Out Form solely for the purpose of enabling such Holders of Other Priority Claims to affirmatively opt-out of the Third-Party Release.

4.3. ***First Lien Claims (Class 3)***.

(a) *Classification*: Class 3 consists of First Lien Claims.

(b) *Allowance*: The First Lien Claims shall be Allowed in the aggregate principal amount of $871,689,024.49 plus accrued and unpaid interest as of the Petition Date in the amount of $9,271,809.29, plus other fees, costs, and expenses under the First Lien Credit Documents.

(c) *Treatment*: On or as soon as reasonably practicable after the Effective Date, except to the extent that a Holder of an Allowed First Lien Claim agrees to less favorable treatment, in full and final satisfaction settlement, release, and discharge and in exchange for each Allowed First Lien Claim, on the Effective Date or on another date acceptable to the Required Consenting First Lien Lenders, each Holder of an Allowed First Lien Claim shall receive its Pro Rata Share (subject to application of the Equity Option) of the following:

(i) with respect to any First Lien RCF Claims on account of unfunded First Lien Revolving LC Exposure as of the Effective Date, participation in the Exit LC Facility in an amount equal to each such Holder's participation in any such unfunded First Lien Revolving LC Exposure as of the Effective Date;

(ii) with respect to any First Lien Claim other than unfunded First Lien Revolving LC Exposure:

A. the Exit Term Loans;

B. 98% of the New Common Interests, subject to dilution on account of the DIP Backstop Premium, the Equity Rights Offering (if applicable), the New Warrants, and the MIP; and

C. Cash from the proceeds of the Equity Rights Offering, if applicable.

In accordance with the First Lien Credit Agreement, the distributions set forth in subclause 4.3(c)(ii) shall be distributed *first* on account of First Lien Claims consisting of accrued and unpaid interest as of the Petition Date until such amounts received are equal to the full face amount of such accrued and unpaid interest as of the Petition Date and *second* on account of First Lien Claims consisting of principal and any other obligations under the First Lien Credit Agreement. The First Lien Deficiency Claim shall be waived and shall not receive any distribution under this Plan.

(d) *Impairment and Voting*: Class 3 is Impaired, and the Holders of First Lien Claims in Class 3 are entitled to vote to accept or reject this Plan.

4.4. ***General Unsecured Claims (Class 4)***.

(a) *Classification*: Class 4 consists of General Unsecured Claims.

(b) *Allowance*: All Allowed General Unsecured Claims (excluding, for the avoidance of doubt, First Lien Deficiency Claims which are hereby deemed waived as of the Effective Date) including all Second Lien Claims which shall be deemed Allowed in the aggregate principal amount of $316,223,250.00 plus accrued and unpaid interest as of the Petition Date in the amount of $12,209,731.04, plus other fees, costs, and expenses of the Second Lien Notes Trustee and the Notes Collateral Agent (as defined in the Second Lien Notes Indenture) under the Second Lien Notes Documents.

(c) *Treatment*: On or as soon as reasonably practicable after the Effective Date, except to the extent that a Holder of an Allowed General Unsecured Claim agrees to less favorable treatment, in full and final satisfaction settlement, release, and discharge and in exchange for each Allowed General Unsecured Claim, on the Effective Date or on another date acceptable to the Required Consenting First Lien Lenders, each Holder of an Allowed General Unsecured Claim shall receive a Pro Rata Share of the following:

(i) 2% of the New Common Interests, subject to dilution by the DIP Backstop Premium, the Equity Rights Offering (if applicable), the New Warrants, and the MIP;

(ii) the New Warrants; and

(iii) if such Holder is an Eligible Holder, on a pro rata basis with the Holders of Allowed General Unsecured Claims and Holders of Allowed Subordinated Unsecured Notes

Claims, the right to purchase up to $200,000,000, in aggregate, of New Common Interests pursuant to the Equity Rights Offering.

provided, that, each Holder of an Allowed General Unsecured Claim that is less than $1,000,000 may elect to receive, in lieu of the foregoing, its Pro Rata Share (determined pro rata for all Holders of General Unsecured Claims regardless of whether such Holders make such election) of the GUC Cashout Value.

(d) *Impairment and Voting.* Class 4 is Impaired, and the Holders of Allowed General Unsecured Claims are entitled to vote to accept or reject this Plan.

4.5. ***Subordinated Unsecured Notes Claims (Class 5)***.

(a) *Classification*: Class 5 consists of Subordinated Unsecured Notes Claims.

(b) *Treatment*: All Subordinated Unsecured Notes Claims shall be canceled, released, and extinguished as of the Effective Date, and Holders of Allowed Subordinated Unsecured Notes Claims shall not receive or retain any distribution, property, or other value on account of such Subordinated Unsecured Notes Claims; provided, that, Eligible Holders of Subordinated Unsecured Notes Claims shall receive, in full and final satisfaction, settlement, release, and discharge and in exchange for each Subordinated Unsecured Notes Claim, their Pro Rata Share of the right to purchase, on a pro rata basis with the other Holders of Allowed Subordinated Unsecured Notes Claims and the Holders of Allowed General Unsecured Claims, up to $200,000,000, in aggregate, of New Common Interests pursuant to the Equity Rights Offering.

(c) *Impairment and Voting*: Class 5 is Impaired, and the Holders of Subordinated Unsecured Notes Claims are entitled to vote to accept or reject this Plan.

4.6. ***Intercompany Claims (Class 6)***.

(a) *Classification*: Class 6 consists of Intercompany Claims.

(b) *Treatment*: On or as soon as reasonably practicable after the Effective Date, all Intercompany Claims shall be either: (i) Reinstated or (ii) set off, settled, distributed, contributed, merged, canceled, or released, in each case, in the discretion of the Debtors with the consent of the Required Consenting First Lien Lenders.

(c) *Impairment and Voting*: Class 6 is Unimpaired and the Holders of Intercompany Claims in Class 6 are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Intercompany Claims are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to such Intercompany Claims.

4.7. ***Subordinated Claims (Class 7)***.

(a) *Classification*: Class 7 consists of Subordinated Claims.

(b) *Treatment*: Holders of Subordinated Claims are not entitled to receive a recovery or distribution on account of such Subordinated Claim. On the Effective Date, Subordinated Claims shall be canceled, released, extinguished, and of no further force or effect.

(c) *Impairment and Voting*: Class 7 is Impaired and not receiving any distribution under this Plan, and Holders of Subordinated Claims are deemed to have rejected this Plan pursuant to

section 1126(g) of the Bankruptcy Code. Therefore, Holders of Subordinated Claims are not entitled to vote to accept or reject this Plan. Holders of Subordinated Claims shall be provided a Release Opt-Out Form solely for purposes of affirmatively opting out of the Third-Party Release.

4.8. ***Intercompany Interests (Class 8)***.

(a) *Classification*: Class 8 consists of Intercompany Interests.

(b) *Treatment*: On or as soon as reasonably practicable after the Effective Date, all Intercompany Interests shall be, at the option of the Debtors, either: (i) Reinstated for administrative convenience or (ii) set off, settled, distributed, contributed, merged, canceled, or released, in each case, in the discretion of the Debtors or Reorganized Debtors.

(c) *Impairment and Voting*: Class 8 is Unimpaired and the Holders of Intercompany Interests in Class 8 are conclusively presumed to have accepted this Plan pursuant to section 1126(f) of the Bankruptcy Code. Therefore, Holders of Intercompany Interests are not entitled to vote to accept or reject this Plan, and the votes of such Holders will not be solicited with respect to such Intercompany Interests.

4.9. ***Existing Parent Equity Interests (Class 9).*** Classification: Class 9 consists of Existing Parent Equity Interests.

(b) *Treatment*: Holders of Existing Parent Equity Interests shall not receive or retain any distribution, property, or other value on account of such Existing Parent Equity Interests. On the Effective Date or as soon as reasonably practicable thereafter, all Existing Parent Equity Interests shall be canceled, released, extinguished, and of no further force and effect.

(c) *Impairment and Voting*: Class 9 is Impaired and not receiving any distribution under this Plan, and Holders of Existing Parent Equity Interests are deemed to have rejected this Plan pursuant to section 1126(g) of the Bankruptcy Code. Therefore, Holders of Existing Parent Equity Interests are not entitled to vote to accept or reject this Plan. Holders of Existing Parent Equity Interests shall be provided a Release Opt-Out Form solely for purposes of affirmatively opting out of the Third-Party Release.

ARTICLE V.

MEANS FOR IMPLEMENTATION.

5.1. ***Restructuring Transactions***.

Without limiting any rights and remedies of the Debtors or Reorganized Debtors under this Plan or applicable law, but in all cases subject to the terms and conditions of the Definitive Documents and any consents or approvals thereunder, the entry of the Confirmation Order shall constitute authorization for the Reorganized Debtors to take, or to cause to be taken, together with any other transaction that may be necessary or appropriate to effect any transaction described in the Restructuring Support Agreement, or described in, approved by, contemplated by, or necessary to effectuate this Plan, including: (a) the execution and delivery of any appropriate agreements or other documents of merger, amalgamation, consolidation, restructuring, conversion, disposition, transfer, formation, organization, dissolution, or liquidation containing terms that are consistent with the terms of this Plan, and that satisfy the requirements of applicable law and any other terms to which the applicable Persons may agree, including the documents comprising the Plan Supplement; (b) the execution and delivery of appropriate instruments of transfer, assignment, assumption, or delegation of any Asset, property, right, liability, debt, or obligation on terms consistent with the terms of this Plan and having other terms for which the applicable Persons agree; (c) the

filing of appropriate certificates or articles of incorporation, reincorporation, merger, amalgamation, consolidation, conversion, or dissolution pursuant to applicable state law or the filing of any elections; (d) such other transactions that are required to effectuate the Restructuring Transactions, including any mergers, consolidations, restructurings, conversions, elections, dispositions, transfers, formations, organizations, dissolutions, or liquidations; (e) the execution, delivery, and Filing, if applicable, of the Definitive Documents; (f) the issuance of Plan Securities, all of which shall be authorized and approved in all respects, in each case, without further action being required under applicable law, regulation, order or rule; and (g) all other actions that the applicable Persons determine to be necessary or appropriate, including making filings or recordings that may be required by applicable law (collectively, the "***Restructuring Transactions***").

5.2. ***Compromise and Settlement of Claims, Interests, and Controversies***.

Pursuant to sections 363 and 1123 of the Bankruptcy Code and Bankruptcy Rule 9019, and in consideration for the classification, distribution, releases, and other benefits provided under this Plan, upon the Effective Date, the provisions of this Plan shall constitute an integrated, good faith compromise and settlement of all Claims, Interests, and controversies relating to the contractual, legal, equitable, and subordination rights that a Claim or an Interest Holder may have with respect to any Allowed Claim or Allowed Interest or any distribution to be made on account of such Allowed Claim or Allowed Interest. This Plan shall be deemed a motion to approve the good-faith compromises and settlements of all Claims, Interests, Causes of Action, and controversies pursuant to Bankruptcy Rule 9019. Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval of the compromise or settlement of all such Allowed Claims, Allowed Interests, and controversies under Bankruptcy Rule 9019, as well as a finding by the Bankruptcy Court that such compromises, settlements, and transactions are in the best interests of the Debtors, their Estates, and Holders of Allowed Claims and Allowed Interests, and each such compromise, settlement, and transaction, is fair, equitable, and within the range of reasonableness. Subject to the provisions of this Plan governing distributions, all distributions made to Holders of Allowed Claims and Allowed Interests in any Class are intended to be and shall be final. As consideration for, among other things, the Releases provided pursuant to this Plan, the Consenting Creditors have agreed pursuant to the Restructuring Support Agreement, for the benefit of the Debtors and the Debtors' Estates, to make contributions to enable the implementation of this Plan, such contributions being fundamentally necessary to the implementation of this Plan, and without consideration, including the Releases, the Consenting Creditors would not have agreed to make the contributions reflected herein. The compromises and settlements described herein shall be non-severable from each other and from all other terms of this Plan.

5.3. ***Administrative Consolidation for Voting and Distribution Purposes Only***.

Other than with respect to Debtor ModivCare, this Plan is premised upon the substantive consolidation of the Debtors solely for the purposes of voting, determining which Class or Classes have accepted this Plan, confirming the Plan, and the resulting treatment of all Claims and Interests and Plan distributions. Each Debtor shall continue to maintain its separate corporate existence for all purposes other than the treatment of Claims and Interests under this Plan. On the Effective Date, and except as otherwise expressly provided in this Plan, solely for voting, confirmation, and distribution purposes with respect to each Class of Claims or Interests, other than with respect to Debtor ModivCare: (a) all Claims or Interests in each respective Class shall be deemed merged or consolidated and treated as Claims or Interests against the Debtors on a consolidated basis; (b) each Claim or Interest in each respective Class will be deemed a single Claim against, or Interest in, the consolidated Debtors; (c) any Claim in a given Class based on a guaranty by any Debtor of the obligations of any other Debtor shall be deemed eliminated and extinguished, so that any Claim against any Debtor and any guarantee thereof by any other Debtor, and any joint or several liability of any of the Debtors, shall be deemed to be one obligation of the consolidated Debtors; and (d) each Holder of any Allowed Claim or Interest in a given Class shall be entitled to a single recovery on

account of such Claim or Interest, in accordance with the treatment provided under this Plan for such Class, regardless of whether such Holder filed Proofs of Claim against multiple Debtors or has Claims against multiple Debtors based on the same or similar debt.

Such substantive consolidation is solely for voting, confirmation and distribution purposes with respect to each Class and shall not constitute a transfer of Assets or liabilities between the Debtors for any other purpose.

Moreover, this Plan's treatment shall not affect any subordination provisions set forth in any agreement relating to any Claim or Interest or the ability of the post-Effective Date Debtors or to seek to have any Claim subordinated in accordance with section 510 of the Bankruptcy Code or other applicable law. Pursuant to section 510 of the Bankruptcy Code, the Debtors expressly reserve the right to reclassify any Allowed Claim or Interest in accordance with any contractual, legal, or equitable subordination relating thereto. Except as provided in this Plan, all subordination rights that a Holder of a Claim may have with respect to any distribution to be made pursuant to this Plan shall be discharged and terminated, and all actions related to the enforcement of such subordination rights shall be permanently enjoined.

5.4. ***Continued Corporate Existence; Effectuating Documents; Corporate Action; Restructuring Transactions***.

(a) Except as otherwise provided in this Plan or the Plan Supplement, the Debtors shall continue to exist after the Effective Date as Reorganized Debtors in accordance with the applicable laws of the respective jurisdictions in which they are incorporated or organized and pursuant to the respective Corporate Governance Documents (or other analogous formation, constituent, or Corporate Governance Documents) in effect before the Effective Date or the New Corporate Governance Documents or other applicable Corporate Governance Documents, except to the extent such certificate of incorporation, certificate of formation, bylaws or operating agreement (or other analogous formation, constituent, or Corporate Governance Documents) are amended by this Plan or otherwise, and to the extent any such document is amended, such document is deemed to be amended pursuant to this Plan and requires no further action or approval (other than any requisite filings required under applicable state or federal law).

(b) Notwithstanding anything herein to the contrary, on or about the Effective Date or as soon as reasonably practicable thereafter, the Debtors or the Reorganized Debtors, as applicable, shall take all actions set forth in and contemplated by this Plan, and enter into any transaction, and may take all actions as may be necessary or appropriate to effectuate the transactions described in, approved by, contemplated by, or necessary or appropriate to effectuate this Plan, including the Restructuring Transactions.

(c) Upon the Effective Date, all actions contemplated by this Plan shall be deemed authorized and approved in all respects, including (i) the assumption of Executory Contracts and Unexpired Leases as provided herein; (ii) the selection, or criteria for selection, of managers, directors, or officers for the Reorganized Debtors; (iii) the issuance of the New Common Interests and the New Warrants, and entry into the New Common Interests Documents and the New Warrants Documents; (iv) entry into the Exit Facilities and Exit Facilities Documents, (v) the issuance and/or distribution of the Plan Securities; (vi) implementation of, and performance under, the Management Incentive Plan; (vii) the consummation of the Equity Rights Offering; (viii) entry into the New Corporate Governance Documents; and (ix) all other actions contemplated by this Plan (whether to occur before, on, or after the Effective Date), in each case in accordance with and subject to the terms hereof.

(d) The Confirmation Order shall and shall be deemed to, pursuant to sections 363, 1123, and 1142 of the Bankruptcy Code, authorize and direct parties, as applicable, among other things, to

perform all actions as may be necessary or appropriate to effect any transaction described in, approved by, contemplated by, or necessary to effectuate this Plan, including the Restructuring Transactions.

(e) Each officer, director, or manager of the Debtors is (and each officer, director, or manager of the Reorganized Debtors shall be) authorized and empowered to issue, execute, deliver, File, or record such contracts, Securities, instruments, releases, indentures, and other agreements or documents and take such actions as may be necessary or appropriate to effectuate, implement, and further evidence the terms and conditions of this Plan and the Plan Securities in the name of and on behalf of the Reorganized Debtors, all of which shall be authorized and approved in all respects, in each case, without the need for any approvals, authorization, consents, or any further action required under applicable law, regulation, order, or rule (including any action by the stockholders or directors or managers of the Debtors or the Reorganized Debtors) except for those expressly required pursuant to this Plan.

(f) All matters provided for in this Plan involving the corporate or limited liability company structure of the Debtors or the Reorganized Debtors, and any corporate or limited liability company action required by the Debtors or the Reorganized Debtors in connection with this Plan or the Restructuring Transactions shall be deemed to have occurred and shall be in effect, without any requirement of further action by the directors, managers, or officers of the Debtors or the Reorganized Debtors or by any other stakeholder, and with like effect as though such action had been taken unanimously by the stockholders, directors, managers, or officers, as applicable, of the Debtors or Reorganized Debtors.

5.5. ***New Corporate Governance Documents***.

Subject to Article V, Section 5.4, the Reorganized Debtors shall enter into agreements and amend their Corporate Governance Documents to the extent necessary to implement the terms and provisions of this Plan. Without limiting the generality of the foregoing, as of the Effective Date, each of the Reorganized Debtors shall be governed by the New Corporate Governance Documents applicable to it. On the Effective Date, the Corporate Governance Documents of each of the Reorganized Debtors will be deemed to be modified to prohibit the issuance of non-voting equity Securities, solely to the extent required under section 1123(a)(6) of the Bankruptcy Code. On or immediately before the Effective Date, each Reorganized Debtors shall file its applicable New Corporate Governance Documents, if any, with the applicable Secretary of State and/or other applicable authorities in its jurisdiction of incorporation or formation in accordance with applicable laws of its jurisdiction of incorporation or formation, to the extent required for such New Corporate Governance Documents to become effective.

5.6. ***Intercompany Interests; Corporate Reorganization***.

To the extent Reinstated under this Plan, on the Effective Date, the Intercompany Interests (a) shall be Reinstated for the ultimate benefit of the Holders of Claims that receive Plan Securities under this Plan, and their Holders shall receive no recovery or distribution, and (b) without the need for any further corporate action or approval of any board of directors, board of managers, managers, management, or stockholders of any Debtor or Reorganized Debtor, as applicable, the certificates and all other documents representing the Reinstated Intercompany Interests shall be deemed to be in full force and effect.

5.7. ***Exit Facilities Documents***.

(a) On the Effective Date, the Reorganized Debtors shall be authorized to execute, deliver, and enter into the Exit Facilities Documents without further (i) notice to or order or other approval of the Bankruptcy Court, (ii) act or omission under applicable law, regulation, order, or rule, (iii) vote, consent, authorization, or approval of any Person, or (iv) action by the Holders of Claims or Interests. The Exit Facilities Documents shall constitute legal, valid, binding and authorized joint and several obligations

of the applicable Reorganized Debtors, enforceable in accordance with their respective terms and such obligations shall not be enjoined or subject to discharge, impairment, release, avoidance, recharacterization, or subordination under applicable law, this Plan, or the Confirmation Order. The financial accommodations to be extended pursuant to the Exit Facilities Documents (and other definitive documentation related thereto) are reasonable and are being extended, and shall be deemed to have been extended, in good faith and for legitimate business purposes.

(b) Confirmation of this Plan shall be deemed approval of the Exit Facilities, and the Exit Facilities Documents, all transactions contemplated thereby, and all actions to be taken, undertakings to be made, and obligations to be incurred by the Reorganized Debtors in connection therewith, and authorization of the Reorganized Debtors to enter into, execute, and deliver the Exit Facilities Documents.

(c) On the Effective Date, all Liens and security interests granted pursuant to the applicable Exit Facilities Documents shall be (i) valid, binding, automatically perfected, and enforceable Liens and security interests in the personal and real property described in and subject to such document, with the priorities established in respect thereof under applicable non-bankruptcy law and (ii) not subject to avoidance, recharacterization, or subordination under any applicable law, this Plan, or the Confirmation Order.

(d) The Reorganized Debtors and the Persons granted Liens and security interests under the applicable Exit Facilities Documents are authorized to make all filings and recordings and to obtain all governmental approvals and consents necessary to establish and perfect such Liens and security interests under the provisions of the applicable state, provincial, federal, or other law (whether domestic or foreign) that would be applicable in the absence of this Plan and the Confirmation Order (it being understood that perfection shall occur automatically by virtue of the entry of the Confirmation Order without the need for any filings or recordings) and will thereafter cooperate to make all other filings and recordings that otherwise would be necessary under applicable law to give notice of such Liens and security interests to third parties.

5.8. ***Equity Rights Offering***.

(a) On the Effective Date, the Debtors or the Reorganized Debtors, as applicable, shall cause the Equity Rights Offering to be consummated, pursuant to the Equity Rights Offering Documents and this Plan and subject to the Equity Rights Offering Procedures. The Equity Rights Offering shall have been conducted prior to the Effective Date, and the New Common Interests shall be issued pro rata to the participants in the Equity Rights Offering, pursuant to the Equity Rights Offering Documents and this Plan and subject to the Equity Rights Offering Procedures.

(b) Entry of the Solicitation Procedures Order shall constitute Bankruptcy Court approval of the Equity Rights Offering, the Equity Rights Offering Documents, and all transactions contemplated thereby, and all actions to be taken, undertakings to be made, and obligations to be incurred by the Reorganized Debtors in connection therewith, including the issuance of New Common Interests pursuant thereto and the payment of all fees, indemnities, expenses, and other payments provided for in connection therewith, and authorization of the Reorganized Debtors to enter into and execute any other documents necessary to effectuate the transactions in this Article V, Section 5.8.

(c) The consummation of the Equity Rights Offering is conditioned on the consummation of the other transactions contemplated by this Plan and satisfaction with the applicable conditions specified in the Equity Rights Offering Documents. The New Common Interests sold in the Equity Rights Offering may not be sold, transferred, or assigned, except in the circumstances set forth in the Equity Rights Offering Documents and subject to the transfer provisions, if any, and other applicable

provisions set forth in the Corporate Governance Documents of the applicable issuers. The proceeds of the Equity Rights Offering shall fund Cash payments to Holders of Allowed First Lien Claims.

5.9. ***Exemption from Securities Laws***.

(a) No registration statement shall be filed under the Securities Act, or pursuant to any state securities laws, with respect to the offer, issuance and distribution of the Plan Securities under this Plan, the Equity Rights Offering Documents, the Confirmation Order, or the New Warrants Documents.

(b) The offer, sale, issuance, and distribution of the Plan Securities in exchange for Claims pursuant to Article II, Article III, Article IV and other provisions of this Plan, the Restructuring Transactions, the Confirmation Order, and the New Warrants Documents shall be exempt from, among other things, the registration requirements of Section 5 of the Securities Act and any other applicable United States, state, or local law requiring registration for the offer or sale of a Security pursuant to section 1145(a) of the Bankruptcy Code to the fullest extent permissible.

(c) To the extent any portion of the Plan Securities is not eligible for the exemption of registration provided by section 1145 of the Bankruptcy Code (including any New Common Interests to be issued pursuant to the Equity Rights Offering), the offering, sale, issuance, and distribution of such Plan Securities shall be made in reliance upon Section 4(a)(2) of the Securities Act and/or Regulation D promulgated thereunder and on equivalent state law registration exemptions or, solely to the extent such exemptions are not available, other available exemptions from registration under the Securities Act. Any Plan Securities that are not issued pursuant to section 1145(a) of the Bankruptcy Code will be considered "restricted" Plan Securities, will bear customary legends, and may not be resold except pursuant to an effective registration statement or under an available exemption from the registration requirements of the Securities Act, such as, under certain conditions, the resale provision of Rule 144A, Regulation S, and/or Rule 144 of the Securities Act, subject to, in each case, the transfer provisions, if any, and other applicable provisions set forth in the Corporate Governance Documents of the applicable issuers. Any recipients of the Plan Securities that are Affiliates of Reorganized Parent will receive "control" Plan Securities that will be subject to the "control securities" restrictions of Rule 144 of the Securities Act.

(d) The Reorganized Debtors and Reorganized Parent need not provide any further evidence other than this Plan and the Confirmation Order with respect to the treatment of the Plan Securities under applicable securities laws. The availability of the exemption under section 1145 of the Bankruptcy Code or any other applicable securities laws shall not be a condition to the occurrence of the Effective Date.

5.10. ***New Warrants Agreement***.

On the Effective Date, the Reorganized Debtors and Holders of Allowed General Unsecured Claims shall enter into the New Warrants Agreement and all New Warrants shall be issued and exercisable into New Common Interests, subject to the terms and conditions of the New Warrants Agreement, and shall be subject to dilution by the MIP.

5.11. ***Cancellation of Existing Securities and Agreements***.

Except for the purpose of evidencing a right to a distribution under this Plan and except as otherwise set forth in this Plan, including with respect to Executory Contracts or Unexpired Leases that shall be assumed by the Reorganized Debtors, or any contract, instrument, or other agreement or document created in connection with this Plan, on the Effective Date, all agreements, instruments, notes, certificates, mortgages, security documents, Prepetition Funded Debt Documents, and any other documents evidencing any Claim or Interest (other than Intercompany Claims and Intercompany Interests that are not modified by

this Plan) and any rights of any Holder in respect thereof shall be deemed canceled, discharged, and of no further force or effect, without any further act or action of any person under any applicable agreement, instrument, document, law, regulation, order, or rule, and the obligations of the Debtors thereunder shall be deemed automatically fully satisfied, released, and discharged, and each of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent, and their respective agents, successors and assigns shall each be automatically and fully released and discharged of and from all duties and obligations thereunder. Notwithstanding such cancellation and discharge on the Effective Date and the release of the Second Lien Notes Trustee and the First Lien Agent from their respective duties thereunder, the First Lien Credit Agreement, the Second Lien Notes Indenture, and the Subordinated Unsecured Notes Indenture shall continue in effect solely (a) to the extent necessary to allow the Holders of First Lien Claims, Second Lien Claims, and Subordinated Unsecured Notes Claims to receive distributions under this Plan in accordance therewith; (b) to the extent necessary to allow the Debtors, the Reorganized Debtors, and/or the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent each to make post-Effective Date distributions in accordance with this Plan at the expense of the Reorganized Debtors, subject to their respective rights as Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent under the First Lien Credit Agreement, the Second Lien Notes Indenture, and the Subordinated Unsecured Notes Indenture, as applicable, or take such other action expressly authorized by this Plan on account of Allowed First Lien Claims, Second Lien Claims, and Subordinated Unsecured Notes Claims; (c) to allow the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent to appear in the Chapter 11 Cases or in any proceeding in the Bankruptcy Court or any other court, including to enforce the respective obligations owed to each of them under this Plan and to enforce any respective obligations owed to each of them under this Plan in accordance with the respective Prepetition Funded Debt Documents; (d) to allow the Second Lien Notes Trustee to exercise its Second Lien Notes Trustee Charging Lien against distributions to Holders of Second Lien Claims, as applicable; (e) to preserve all rights, remedies, indemnities, powers, and protections, including rights of enforcement, of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent against any person or entity (including, without limitation, with respect to any indemnification or contribution under the respective Prepetition Funded Debt Documents) or any exculpations of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent, pursuant to and subject to the terms of the respective Prepetition Funded Debt Documents to the extent such rights, remedies, indemnities, powers, and protections are enforceable; and (f) to permit the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent to perform any functions that are necessary to effectuate the foregoing, *provided*, that nothing in the foregoing shall affect the discharge of Claims pursuant to the Bankruptcy Code, the Confirmation Order, or this Plan or result in any liability or expense to the Reorganized Debtors. Nothing contained herein shall be deemed to cancel, terminate, release, or discharge the obligation of the Debtors or any of their counterparties under any Executory Contract or Unexpired Lease to the extent such Executory Contract or Unexpired Lease has been assumed by the Debtors pursuant to a Final Order of the Bankruptcy Court or hereunder. For the avoidance of doubt, the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent shall have no ongoing duties to the Holders of the First Lien Claims, the Second Lien Claims, and the Subordinated Unsecured Notes Claims under any of the canceled and discharged First Lien Credit Agreement, Second Lien Notes Indenture, Subordinated Unsecured Notes Indenture, and Prepetition Funded Debt Documents following the Effective Date other than as expressly set forth in this Plan or Confirmation Order.

5.12. ***Cancellation of Existing Parent Equity Interests and other Interests***.

(a) Except as otherwise specifically provided herein, including pursuant to Article V, Section 5.4(a) of this Plan, all notes, instruments, certificates or other agreement or document evidencing debt of the Debtors, Existing Parent Equity Interests, and other Interests will be canceled and obligations of the Debtors thereunder will be discharged and of no further force or effect, except, where applicable, for

the purpose of allowing the applicable agents and trustees to receive distributions from the Debtors under this Plan and to make any further distributions to the applicable Holders on account of their Claims.

(b) Upon the full payment or other satisfaction of its Allowed Other Secured Claim, or promptly thereafter, any Lien securing any Other Secured Claim shall be deemed released and the Holder of such Allowed Other Secured Claim shall deliver to the Debtors or the Reorganized Debtors, as applicable, any Collateral or other property of a Debtor held by such Holder, together with any termination statements, instruments of satisfaction, or releases of all security interests with respect to its Allowed Other Secured Claim that may be reasonably required to terminate any related financing statements, mortgages, mechanics' or other statutory Liens, or lis pendens, or similar interests or documents.

(c) After the Effective Date and following the (i) distributions to Holders on account of Allowed DIP Claims, Allowed First Lien Claims, and Allowed Second Lien Claims and (ii) payment of the Restructuring Expenses, any Lien securing such Claims shall be deemed released and the Debtors or the Reorganized Debtors may, in their sole discretion, take any action necessary to terminate, cancel, extinguish, and/or evidence the release of any and all mortgages, deeds of trust, Liens, pledges, and other security interests with respect to the DIP Claims, First Lien Claims, and Second Lien Claims, including the preparation and filing, in form, substance, and content of any and all documents necessary to terminate, satisfy, or release any mortgages, deeds of trust, Liens, pledges, and other security interests held by the DIP Agent, the First Lien Agent, the Second Lien Notes Trustee, and Holders of DIP Claims, and First Lien Claims, Second Lien Claims, including UCC-3 termination statements.

5.13. ***Officers and Boards of Directors***.

(a) On the Effective Date, the New Board of the Reorganized Debtors shall be appointed by a pre-emergence committee consisting of certain Holders comprising the Required Consenting First Lien Lenders, in consultation with the Debtors, and disclosed in the Plan Supplement prior to emergence in accordance with section 1129(a)(5) of the Bankruptcy Code. The identity of the New Board members will be disclosed in the Plan Supplement at or prior to the Confirmation Hearing. Except to the extent that an existing director of ModivCare is designated (by the aforementioned pre-emergence committee) to serve on the New Board, the existing directors of ModivCare in their capacities as such, shall be deemed to have resigned or shall otherwise cease to be a director of ModivCare on the Effective Date. Each independent director of the Debtors, in such capacity, shall not have any of his/her respective privileged and confidential documents, communications, or information transferred (or deemed transferred) to the Reorganized Debtors, Reorganized Parent, or any other Entity without such director's prior written consent unless such information constitutes property of the Debtors.

(b) The existing directors of each of ModivCare's subsidiaries shall remain in their current capacities as directors of the applicable Reorganized Debtor until replaced or removed in accordance with the organizational documents of the applicable Reorganized Debtors.

(c) The existing officers of the Debtors as of the Effective Date shall remain in their current capacities as officers of the Reorganized Debtors, subject to their right to resign and the ordinary rights and powers of the New Board to remove or replace them in accordance with the New Corporate Governance Documents and any applicable agreements (including, but not limited to, employment agreements and offer letters) that are assumed pursuant to this Plan.

5.14. ***Management Incentive Plan***.

After the Effective Date, the New Board shall adopt and implement the Management Incentive Plan.

5.15. ***First Lien Claim Equity Option***

Prior to the Effective Date, each Holder of an Allowed First Lien Claim shall have the opportunity to irrevocably elect to receive (subject to the limitations set forth in the Election Procedures) (a) additional New Common Interests in lieu of receiving some or all of their pro rata share Exit Term Loans (the "Equity Option") or (b) additional Exit Term Loans in lieu of receiving some or all of their portion of the New Common Interests. New Common Interests distributed pursuant to the Equity Option shall not reduce the aggregate amount of Exit Term Loans available for distribution. The (a) New Common Interests distributed on account of the Equity Option shall reduce, on a ratable basis and at a ratio to be set forth in the Election Procedures, the amount of New Common Interests issued to each Holder of the Allowed First Lien Claims that elects to receive additional Exit Term Loans (to the extent available) in lieu of its pro rata portion of the New Common Interests and (b) the Exit Term Loans distributed on account of the equity Option shall reduce, on a ratable basis and at a ratio to be set forth in the Election Procedures, the amount of Exit Term Loans issued to each Holder of the Allowed First Lien Claims that elects to receive additional New Common Interests in lieu of its pro rata portion of the Exit Term Loans. Holders shall have the opportunity to make such election pursuant to the Election Procedures.

5.16. ***Issuance of New Common Interests and Deregistration***. On the Effective Date, Reorganized Parent shall issue and deliver or reserve for issuance, as applicable, all of the New Common Interests issuable in accordance with the terms of this Plan and the other Definitive Documents. The issuance and delivery or reservation for issuance, as applicable, of such New Common Interests is authorized without the need for further corporate or other action or any consent or approval of any national securities exchange upon which the New Common Interests may be listed on or immediately following the Effective Date. All of the New Common Interests issuable under this Plan and the other Definitive Documents shall, when issued in accordance with this Plan and/or any other applicable Definitive Documents, be duly authorized, validly issued, fully paid, and non-assessable. Each Holder of New Common Interests shall be deemed, without further notice or action, to have agreed to be bound by the New Corporate Governance Documents, as the same may be amended from time to time following the Effective Date in accordance with their terms. The New Corporate Governance Documents shall be binding on all Entities receiving New Common Interests (and their respective successors and permitted assigns), whether received pursuant to this Plan or otherwise and regardless of whether such Entity executes or delivers a signature page to any New Corporate Governance Document. The issuance and delivery or reservation for issuance, as applicable, of the New Common Interests in accordance with this Plan and the other Definitive Documents are authorized without the need for any further limited liability company or corporate action and without any further action by any Holder of a Claim or Interest.

Reorganized Parent shall not be obligated to effect or maintain any listing of the New Common Interests for trading on any national securities exchange (within the meaning of the Exchange Act) and it has no current intention of maintaining or obtaining such listing. The New Common Interests are expected to be delivered via book-entry transfer by the Distribution Agent in accordance with this Plan and the other Definitive Documents, rather than through the facilities of DTC; however, in the event the New Common Interests are DTC eligible on the Effective Date, delivery thereof may be made via DTC. Upon the Effective Date, after giving effect to the Restructuring Transactions, the New Common Interests shall be that number of shares or membership interests as may be designated in the New Corporate Governance Documents. On and after the Effective Date, transfers of New Common Interests shall be made in accordance with

applicable United States law, United States securities laws (as applicable), and the New Corporate Governance Documents.

As promptly as reasonably practicable following the Effective Date, Reorganized Parent shall take all necessary steps in accordance with and to the extent permitted by the Exchange Act and the Securities Act to terminate the registration of all Securities under the Exchange Act and Securities Act, including to de-register its Existing Parent Equity Interests, and to terminate its reporting obligations under sections 12, 13, and 15(d) of the Exchange Act, including by (a) filing, or causing any applicable national securities exchange to file, a Form 25 with the SEC under the Exchange Act, and (b) filing a Form 15 with the SEC under the Exchange Act.

5.17. ***Effectuating Documents; Further Transactions***.

Before, on, and after the Effective Date, the Debtors, the Reorganized Debtors, and the directors, managers, officers, authorized persons, and members of the boards of directors or managers and directors or managers of the foregoing, are authorized to and may issue, execute, deliver, file, or record such contracts, securities, notes, instruments, certificates, releases, and other agreements or documents and take such actions as may be necessary or appropriate to effectuate, implement, and further evidence the terms and provisions of this Plan, the New Corporate Governance Documents, the Exit Facilities Documents, and any Securities issued pursuant to this Plan in the name of and on behalf of the Reorganized Debtors, without the need for any approvals, authorizations, actions, or consents except for those expressly required pursuant to this Plan.

5.18. ***Authority of Debtors***.

Effective on the Confirmation Date, the Debtors and the Reorganized Debtors, as applicable, shall be empowered and authorized to take or cause to be taken, before the Effective Date, all actions necessary or appropriate to achieve the Effective Date and enable the Reorganized Debtors to implement effectively the provisions of this Plan, the Confirmation Order, the Definitive Documents, and the Restructuring Transactions.

5.19. ***Continuing Effectiveness of Final Orders***.

Payment authorization granted to the Debtors under any prior Final Order entered by the Bankruptcy Court shall continue in effect after the Effective Date. Accordingly, the Debtors or the Reorganized Debtors may pay or otherwise satisfy any Claim to the extent permitted by, and subject to, the applicable Final Order without regard to the treatment that would otherwise be applicable to such Claim under this Plan.

5.20. ***Nonconsensual Confirmation***.

To the extent any Voting Class has not voted to accept this Plan, the Debtors intend to undertake to have the Bankruptcy Court confirm this Plan under section 1129(b) of the Bankruptcy Code as to any Classes that reject or are deemed to reject this Plan.

5.21. ***Closing of the Chapter 11 Cases***.

After an Estate has been fully administered, the Reorganized Debtors shall be authorized, but not directed, to submit one or more motion(s) to the Bankruptcy Court for entry of one or more order(s) that

close and issue final decrees for any of the Chapter 11 Cases, for any Debtor, in each case in accordance with the Bankruptcy Code and the Bankruptcy Rules.

5.22. ***Notice of Effective Date***.

On or as soon as practicable after the Effective Date, the Debtors shall File a notice of the occurrence of the Effective Date with the Bankruptcy Court.

ARTICLE VI.

DISTRIBUTIONS.

6.1. ***Distributions Generally***.

The Distribution Agent shall make all distributions under this Plan to the appropriate Holders of Allowed Claims in accordance with the terms of this Plan, provided that initial Plan distributions shall be made to or at the direction of the Second Lien Notes Trustee, the Subordinated Unsecured Notes Trustee, and the First Lien Agent, as applicable, for further distribution in accordance with the Prepetition Funded Debt Documents, respectively.

If and to the extent that there are Disputed Claims, distributions on account of any such Disputed Claims shall be made pursuant to the provisions set forth in Article VII. Except as otherwise provided herein, Holders of Claims shall not be entitled to postpetition interest, dividends, or accruals on the distributions provided for herein, regardless of whether such distributions are delivered on or at any time after the Effective Date.

6.2. ***Special Rules for Distributions to Holders of Disputed Claims***.

Except as otherwise agreed by the relevant parties: (a) no partial payments and no partial distributions shall be made with respect to a Disputed Claim until all such disputes in connection with such Disputed Claim have been resolved by settlement or Final Order; and (b) any Entity that holds both an Allowed Claim and a Disputed Claim shall not receive any distribution on the Allowed Claim unless and until all objections to the Disputed Claim have been resolved by settlement or Final Order or such Claims or Interests have been Allowed or expunged.

6.3. ***Distribution Record Date***.

As of the close of business on the Distribution Record Date, the various transfer registers for each of the Classes of Claims or Interests as maintained by the Debtors or their respective agents, shall be deemed closed, and there shall be no further changes in the record Holders of any of the Claims or Interests. The Debtors or the Reorganized Debtors shall have no obligation to recognize any transfer of the Claims or Interests occurring on or after the Distribution Record Date. In addition, with respect to payment of any Cure Claims or disputes over any Cure Claims, neither the Debtors nor the Distribution Agent shall have any obligation to recognize or deal with any party other than the non-Debtor party to the applicable Executory Contract or Unexpired Lease as of the Distribution Record Date, even if such non-Debtor party has sold, assigned, or otherwise transferred its Cure Claim. Notwithstanding the foregoing, the Distribution Record Date shall not apply to distributions in respect of the Second Lien Notes or any securities deposited with DTC, the Holders of which shall receive distributions, if any, in accordance with the customary

exchange procedures of DTC or this Plan. For the avoidance of doubt, in connection with a distribution through the facilities of DTC (if any), DTC shall be considered a single Holder for purposes of distributions.

6.4. ***Date of Distributions***.

(a) Except as otherwise provided in this Plan (including payments made in the ordinary course of the Debtors' business) or as paid pursuant to a prior Bankruptcy Court order, on the Effective Date or, if a Claim or Interest is not Allowed on the Effective Date, on the date that such Claim or Interest becomes Allowed, or, in each case, as soon as reasonably practicable thereafter, or as otherwise determined in accordance with this Plan and the Confirmation Order, including the treatment provisions of Article IV of this Plan, each Holder of an Allowed Claim shall receive the full amount of the distributions that such Holder of an Allowed Claim is entitled to under this Plan; *provided*, that the Reorganized Debtors may implement periodic distribution dates to the extent they determine them to be appropriate (but subject in all respects to the Definitive Documents); *provided further*, that the Reorganized Debtors may make distributions of Plan Securities following the Effective Date, including to Holders of Disputed Claims that become Allowed Claims; *provided further*, that any Holder participating in the Equity Rights Offering may inform the Distribution Agent pursuant to the Equity Rights Offering Procedures that the distributions in respect of such Holder's Allowed Claims shall be made to one or more of its Affiliates, designees or Related Funds. If and to the extent that there are Disputed Claims, distributions on account of any such Disputed Claims shall be made pursuant to the provisions set forth in Article VII; *provided*, that any Plan Security that is issuable to Holders of Allowed Claims but is withheld from distribution on account of a Holder of a Disputed Claim shall not be issued until such time such Disputed Claim is resolved and the Plan Securities are to be distributed. Except as specifically provided in this Plan, Holders of Allowed Claims shall not be entitled to interest, dividends, or accruals on the distributions provided for in this Plan, regardless of whether such distributions are delivered on or at any time after the Effective Date.

(b) For all purposes associated with distributions under the Plan, all guarantees by any Debtor of the obligations of any other Debtor, as well as any joint and several liability of any Debtor with respect to any other Debtor, shall be deemed eliminated so that any obligation that could otherwise be asserted against more than one Debtor shall result in a single distribution under the Plan; provided, that Claims held by a single entity against different Debtors that are not based on guarantees or joint and several liability shall be entitled to the applicable distribution for each such Claim against each applicable Debtor. Any such Claims shall be released pursuant to Article X of the Plan and shall be subject to all potential objections, defenses, and counterclaims, and to estimation pursuant to section 502(c) of the Bankruptcy Code. For the avoidance of doubt, this shall not affect the obligation of each and every Debtor to pay fees payable pursuant to section 1930(a) of the Judicial Code until such time as a particular Chapter 11 Case is closed, dismissed, or converted, whichever occurs first.

6.5. ***Delivery of Distributions to Holders of the First Lien Loans***.

All distributions with respect to the First Lien Claims shall be made to or at the direction of the First Lien Agent. As a condition precedent to the distributions provided for in this subsection, the Holders of Allowed First Lien Claims shall be deemed to have surrendered their First Lien Loans and all such surrendered First Lien Loans and the related book entry positions and other documents shall be deemed to be canceled in accordance with Article V, Section 5.11 of the Plan as of the Effective Date in exchange for such distributions.

6.6. ***Delivery of Distributions to Holders of the Second Lien Notes***.

All distributions with respect to the Second Lien Notes shall be made to or at the direction of the Second Lien Notes Trustee, and the Second Lien Notes Trustee shall hold or direct such distributions for

the benefit of the Holders of Second Lien Claims in accordance with the Second Lien Notes Indenture. At the expense of the Debtors or the Reorganized Debtors, the Second Lien Notes Trustee shall arrange to deliver such distributions to, or on behalf of, the respective Holders of such Allowed Second Lien Claims (subject to the Second Lien Notes Trustee Charging Lien). The Second Lien Notes Trustee shall not incur any liability whatsoever on account of any distributions under the Plan, except for its own gross negligence or willful misconduct as determined by a final, non-appealable order of a court of competent jurisdiction. As a condition precedent to the distributions provided for in this subsection, the Holders of Allowed Second Lien Claims shall be deemed to have surrendered their Second Lien Notes and other documentation underlying their Allowed Second Lien Claims, and all such surrendered Second Lien Notes and the related book entry positions and other documentation shall be deemed to be canceled in accordance with Article V, Section 5.11 of the Plan as of the Effective Date in exchange for such distributions.

Notwithstanding any policies, practices, or procedures of DTC or any other applicable clearing system, DTC and all other applicable clearing systems shall cooperate with and take all actions reasonably requested by the Second Lien Notes Trustee to facilitate distributions to Holders of Allowed Second Lien Claims without requiring that such distributions be characterized as repayments of principal or interest. The Second Lien Notes Trustee shall not be required to provide indemnification or other security to DTC in connection with any distributions to Holders of Allowed Second Lien Claims through the facilities of DTC. In the event that, notwithstanding the Debtors' good faith efforts, any of the Plan consideration to be distributed to the Holders of Second Lien Claims are not approved to be eligible for distribution through DTC as of the Effective Date of the Plan, then the Debtors and the Second Lien Notes Trustee shall confer regarding a methodology of distribution consistent with the terms of the Second Lien Notes Indenture.

6.7. ***Distribution Agent***.

All distributions under this Plan to Claims other than with respect to the First Lien Loans and the Second Lien Notes shall be made by the applicable Distribution Agent which may be a Debtor, Reorganized Debtor, or such other Entity designated as Distribution Agent pursuant to the Plan Supplement, on or after the Effective Date or as otherwise provided herein. A Distribution Agent shall not be required to give any bond or surety or other Security for the performance of its duties, and all reasonable fees and expenses incurred by such Distribution Agents directly related to distributions hereunder shall be reimbursed by the Reorganized Debtors.

6.8. ***Rights and Powers of Distribution Agent***.

(a) From and after the Effective Date, the Distribution Agent, solely in its capacity as Distribution Agent, shall be exculpated by all Entities, including Holders of Claims against and Interests in the Debtors and other parties in interest, from any and all Claims, Causes of Action, and other assertions of liability arising out of the discharge of the powers and duties conferred upon such Distribution Agent by this Plan or any order of the Bankruptcy Court entered pursuant to or in furtherance of this Plan, or applicable law, except for actions or omissions to act arising out of the gross negligence or willful misconduct, fraud, malpractice, criminal conduct, or *ultra vires* acts of such Distribution Agent. No Holder of a Claim or Interest or other party in interest shall have or pursue any Claim or Cause of Action vested in a Distribution Agent by order of the Bankruptcy Court, pursuant to this Plan, or as deemed by such Distribution Agent to be necessary and proper to implement the provisions hereof.

(b) The Distribution Agent shall be empowered to: (i) take, and otherwise effectuate, all actions and execute all agreements, instruments, and other documents necessary to perform its duties under this Plan; (ii) make all applicable distributions or payments provided for under this Plan; (iii) employ professionals to represent it with respect to its responsibilities; and (iv) exercise such other powers (A) as may be vested in the Distribution Agent by order of the Bankruptcy Court (including any Final Order issued

after the Effective Date) or pursuant to this Plan or (B) as deemed by the Distribution Agent to be necessary and proper to implement the provisions of this Plan.

6.9. ***Expenses of Distribution Agent***.

Except as otherwise ordered by the Bankruptcy Court and subject to the written agreement of the Reorganized Debtors, the reasonable and documented fees and expenses incurred by the Distribution Agent acting in such capacity (including reasonable and documented attorneys' fees and expenses) on or after the Effective Date shall be paid in Cash by the Reorganized Debtors in the ordinary course of business.

6.10. ***No Postpetition Interest***.

Except as otherwise specifically provided for in this Plan, the Confirmation Order, any other Definitive Document, another Final Order of the Bankruptcy Court, or required by applicable bankruptcy law (including, without limitation, as required pursuant to section 506(b) or section 511 of the Bankruptcy Code), postpetition interest shall not accrue or be paid on any Claims, and no Holder of a Claim shall be entitled to interest accruing on such Claim on or after the Petition Date.

6.11. ***Delivery of Distributions***.

Subject to Bankruptcy Rule 9010, all distributions to any Holder of an Allowed Claim shall be made by a Distribution Agent, who shall transmit such distribution to the applicable Holders of Allowed Claims (or to the DIP Agent, Second Lien Notes Trustee, and the First Lien Agent, as applicable, as provided herein in the case of DIP Claims, the First Lien Claims, and the Second Lien Claims, as applicable); *provided*, that any Holder participating in the Equity Rights Offering as of the Distribution Record Date may send a written notice to the Distribution Agent that the distributions in respect of such Holder's Allowed Claims shall be made to one or more of its Affiliates, designees or Related Funds; *provided further*, that such Holder and relevant Affiliate, designee, or Related Fund comply with all applicable withholding and reporting requirements set forth in Article VI, Section 6.22 of this Plan. If a distribution to any Holder is returned as undeliverable, no further distributions shall be made to such Holder unless and until such Distribution Agent is notified in writing of such Holder's then-current address, at which time all currently-due, missed distributions shall be made to such Holder as soon as reasonably practicable thereafter without interest. Nothing herein shall require the Distribution Agent to attempt to locate Holders of undeliverable distributions and, if located, assist such Holders in complying with Article VI, Section 6.22 of this Plan.

6.12. ***Distributions as of Effective Date***.

Distributions to Holders of Disputed Claims that are not Allowed Claims as of the Effective Date, but which later become Allowed Claims shall be deemed to have been made on the Effective Date.

6.13. ***Unclaimed Property***.

One year from the later of (a) the Effective Date and (b) the date that is ten (10) Business Days after the date of a distribution on an Allowed Claim, all distributions payable on account of such Claim that are undeliverable or otherwise unclaimed shall be deemed unclaimed property under section 347(b) of the Bankruptcy Code and shall automatically, without need for need for any further action by or approval of any Person, including, without limitation, the Bankruptcy Court, revert to the Reorganized Debtors or their successors or assigns, and all Claims of any other person (including the Holder of a Claim in the same Class) to such distribution shall be discharged and forever barred. The Reorganized Debtors and the

Distribution Agent shall have no obligation to attempt to locate any Holder of an Allowed Claim other than by reviewing the Debtors' books and records and the Bankruptcy Court's Filings.

6.14. ***Time Bar to Cash Payments***.

Checks issued by the Distribution Agent in respect of Allowed Claims shall be null and void if not negotiated within ninety (90) days after the date of issuance thereof. Thereafter, the amount represented by such voided check shall irrevocably revert to the Reorganized Debtors, and any Claim in respect of such voided check shall be discharged and forever barred, notwithstanding any federal or state escheat laws to the contrary. Requests for reissuance of any check shall be made to the applicable Distribution Agent by the Holder of the Allowed Claim to whom such check was originally issued, prior to the expiration of the ninety (90) day period.

6.15. ***Manner of Payment under Plan***.

Except as otherwise specifically provided in this Plan, at the option of the Debtors or the Reorganized Debtors, as applicable, any Cash payment to be made hereunder may be made by a check or wire transfer or as otherwise required or provided in applicable agreements or customary practices of the Debtors.

6.16. ***Satisfaction of Claims***.

Except as otherwise specifically provided in this Plan, any distributions and deliveries to be made on account of Allowed Claims under this Plan shall be in complete and final satisfaction, release, settlement, and discharge of and exchange for such Allowed Claims.

6.17. ***Fractional Interests***.

No fractional shares of New Common Interests shall be distributed. If any distributions of New Common Interests pursuant to this Plan would result in the issuance of a fractional share of New Common Interests, then the number of shares of New Common Interests to be issued in respect of such distribution will be calculated to one decimal place and rounded up or down to the closest whole share (with a half share or greater rounded up and less than a half share rounded down). The total number of shares of New Common Interests to be distributed in connection with this Plan shall be adjusted as necessary to account for the rounding provided for in this Article VI, Section 6.15. No consideration shall be provided in lieu of fractional shares that are rounded down. Neither the Reorganized Debtors nor the Distribution Agent shall have any obligation to make a distribution that is less than one (1) share of New Common Interests. Fractional shares of New Common Interests that are not distributed in accordance with this section shall be returned to, and the ownership thereof shall vest in, the Reorganized Debtors.

6.18. ***Minimum Cash Distributions***.

The Distribution Agent shall not be required to make any distribution of Cash less than one hundred dollars ($100) to any Holder of an Allowed Claim; *provided*, that if any distribution is not made pursuant to this Article VI, Section 6.18, such distribution shall be added to any subsequent distribution to be made on behalf of the Holder's Allowed Claim.

6.19. ***Setoffs***.

(a) The Debtors and the Reorganized Debtors, or such Entity's designee as instructed by such Debtor or Reorganized Debtor, as applicable, may, but shall not be required to, set off or recoup

against any Claim, and any distribution to be made pursuant to this Plan on account of such Claim, any and all Claims, rights, and Causes of Action of any nature whatsoever that the Debtors or the Reorganized Debtors or their successors may have against the Holder of such Claim pursuant to the Bankruptcy Code or applicable non-bankruptcy law; *provided*, that neither the failure to do so nor the allowance of any Claim hereunder shall constitute a waiver or release by a Debtor or a Reorganized Debtor or its successor of any claims, rights, or Causes of Action that a Debtor or Reorganized Debtor or its successor or assign may possess against the Holder of such Claim.

(b) In no event shall any Holder of Claims be entitled to set off any such Claim against any claim, right, or Cause of Action of the Debtor or Reorganized Debtor, unless (i) the Debtors or the Reorganized Debtors, as applicable, have consented or (ii) such Holder has Filed a motion with the Bankruptcy Court requesting the authority to perform such setoff on or before the Confirmation Date, and notwithstanding any indication in any Proof of Claim or otherwise that such Holder asserts, has, or intends to preserve any right of setoff pursuant to section 553 of the Bankruptcy Code or otherwise. Notwithstanding the foregoing, this paragraph does not create any new rights to setoff or recoupment that did not exist under any applicable law or agreement in existence prior to the Effective Date.

6.20. ***Allocation of Distributions Between Principal and Interest***.

Except as otherwise provided in Section 4.3(c) of this Plan and subject to Article VI, Section 6.10 herein or as otherwise required by law (as reasonably determined by the Reorganized Debtors), distributions with respect to an Allowed Claim shall be allocated first to the principal portion of such Allowed Claim (as determined for United States federal income tax purposes) and, thereafter, to the remaining portion of such Allowed Claim, if any.

6.21. ***No Distribution in Excess of Amount of Allowed Claim***.

Notwithstanding anything in this Plan to the contrary, no Holder of an Allowed Claim shall receive, on account of such Allowed Claim, distributions in excess of the Allowed amount of such Claim.

6.22. ***Compliance with Tax Requirements***.

(a) In connection with this Plan and all distributions hereunder, the Reorganized Debtors or other applicable Distribution Agent shall comply with all applicable withholding and reporting requirements imposed by any Governmental Unit, and all distributions hereunder and all related agreements shall be subject to any such withholding and reporting requirements. The Reorganized Debtors or other applicable Distribution Agent shall have the right, but not the obligation, to take any and all actions that may be necessary or appropriate to comply with such applicable withholding and reporting requirements, including (i) withholding distributions and amounts therefrom pending receipt of information necessary to facilitate such distributions, including properly executed withholding certification forms, and (ii) in the case of a non-Cash distribution that is subject to withholding, withholding an appropriate portion of such property and either liquidating such withheld property to generate sufficient funds to pay applicable withholding taxes (or reimburse the distributing party for any advance payment of the withholding tax) or pay the withholding tax using its own funds and retain such withheld property. Notwithstanding any provision in this Plan to the contrary, all Persons holding Claims or Interests shall be required to provide any information necessary to effect information reporting and the withholding of any taxes (or establish eligibility for an exclusion therefrom), and each Holder of an Allowed Claim or an Allowed Interest will have the sole and exclusive responsibility for the satisfaction and payment of any tax obligations imposed by any Governmental Unit, including income, withholding, and other tax obligations, on account of such

distribution. Any amounts withheld or reallocated pursuant to this Article VI, Section 6.22 shall be treated as if distributed to the Holder of the Allowed Claim or Allowed Interest.

(b) Any Person or Entity entitled to receive any property as an issuance, distribution or otherwise under this Plan shall, upon request, deliver to the applicable Reorganized Debtor or other applicable Distribution Agent, or such other Person designated by the Reorganized Debtor or the Distribution Agent, an IRS Form W-9 or, if the payee is a foreign Person or Entity, the applicable version of IRS Form W-8, or any other forms or documents reasonably requested by a Reorganized Debtor or Distribution Agent to reduce or eliminate any withholding required by any applicable Governmental Unit.

ARTICLE VII.

PROCEDURES FOR RESOLVING DISPUTED CLAIMS

7.1. ***Allowance and Disallowance of Claims***.

(a) After the Effective Date, and except as otherwise provided in this Plan, the Reorganized Debtors shall have and shall retain any and all available rights and defenses that the Debtors had with respect to any Claim immediately before the Effective Date, including the right to assert any objection to Claims based on the limitations imposed by section 502 of the Bankruptcy Code. The Debtors and the Reorganized Debtors may, but are not required to, contest the amount and validity of any Disputed Claim or contingent or unliquidated Claim in the ordinary course of business in the manner and venue in which such Claim would have been determined, resolved or adjudicated if the Chapter 11 Cases had not been commenced.

(b) All Claims and Interests of any Entity from which property is sought by the Debtors under sections 542, 543, 550, or 553 of the Bankruptcy Code or that the Debtors or the Reorganized Debtors allege is a transferee of a transfer that is avoidable under sections 522(f), 522(h), 544, 545, 547, 548, 549, or 724(a) of the Bankruptcy Code shall be disallowed if: (i) the Entity, on the one hand, and the Debtors or the Reorganized Debtors, as applicable, on the other hand, agree or the Bankruptcy Court has determined by Final Order that such Entity or transferee is liable to turn over any property or monies under any of the aforementioned sections of the Bankruptcy Code; and (ii) such Entity or transferee has failed to turn over such property by the date set forth in such agreement or Final Order.

7.2. ***Claims Administration Responsibilities***.

Except as otherwise specifically provided in this Plan, after the Effective Date, the Reorganized Debtors shall have the authority: (i) to File, withdraw, or litigate to judgment, objections to Claims or Interests; (ii) to settle or compromise any Disputed Claim or Interest without any further notice to or action, order, or approval by the Bankruptcy Court; and (iii) to administer and adjust the Claims Register to reflect any such settlements or compromises without any further notice to or action, order, or approval by the Bankruptcy Court. For the avoidance of doubt, except as otherwise provided herein, from and after the Effective Date, each Reorganized Debtor shall have and retain any and all rights and defenses such Debtor had immediately before the Effective Date with respect to any Disputed Claim or Interest, including the Causes of Action retained pursuant to this Plan.

7.3. ***Adjustment to Claims or Interests Without Objection***.

Any duplicate Claim or Interest or any Claim or Interest that has been paid, satisfied, amended, or superseded may be adjusted or expunged on the claims register by the Reorganized Debtors without the Reorganized Debtors having to File an application, motion, complaint, objection, or any other

legal proceeding seeking to object to such Claim or Interest and without any further notice to or action, order, or approval of the Bankruptcy Court.

7.4. ***No Distributions Pending Allowance***.

If any portion of a Claim is Disputed, no payment or distribution provided hereunder may be made on account of such Claim unless and until such Claim becomes an Allowed Claim; *provided* that if only a portion of a Claim is Disputed, such Claim may be deemed Allowed in the amount not Disputed and payment or distribution shall be made on account of such undisputed amount.

7.5. ***Distributions After Allowance***.

To the extent that a Disputed Claim ultimately becomes an Allowed Claim, distributions (if any) shall be made to the Holder of such Allowed Claim in accordance with the provisions of this Plan. As soon as reasonably practicable after the date that the order or judgment of the Bankruptcy Court allowing any Disputed Claim becomes a Final Order, the Reorganized Debtors shall provide to the Holder of such Claim the distribution (if any) to which such Holder is entitled under this Plan as of the Effective Date, without any postpetition interest to be paid on account of such Claim.

7.6. ***Claim Resolution Procedures Cumulative***.

All of the Claims, objection, estimation, and resolution procedures in this Plan are intended to be cumulative and not exclusive of one another. Claims may be estimated and subsequently settled, compromised, withdrawn, or resolved in accordance with this Plan without further notice or Bankruptcy Court approval.

ARTICLE VIII.

TREATMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES.

8.1. ***Assumption or Rejection of Executory Contracts and Unexpired Leases***.

(a) On the Effective Date, all Executory Contracts and Unexpired Leases of the Debtors, including, but not limited to, employee contracts and offer letters (other than any individual employee contract or offer letter for which the parties separately agree to different treatment), which have not expired by their own terms on or prior to the Confirmation Date, shall be deemed assumed by the Debtors in accordance with, and subject to, the provisions and requirements of sections 365 and 1123 of the Bankruptcy Code, except for those Executory Contracts and Unexpired Leases that, in each case:

(i) have been assumed, assumed and assigned, or rejected by the Debtors by prior order of the Bankruptcy Court;

(ii) are the subject of a motion to reject Filed by the Debtors pending on the Effective Date;

(iii) are identified as rejected Executory Contracts and Unexpired Leases by the Debtors on the Schedule of Rejected Executory Contracts and Unexpired Leases to be Filed in the Plan Supplement, which may be amended by the Debtors up to and through the Effective Date to add or remove Executory Contracts and Unexpired Leases by Filing with the Bankruptcy Court a subsequent Plan Supplement and serving it on the affected non-Debtor contract parties;

(iv) are rejected or terminated pursuant to the terms of this Plan; or

(v) are the subject of a pending Cure Dispute.

(b) Without amending or altering any prior order of the Bankruptcy Court approving the assumption or rejection of any Executory Contract or Unexpired Lease, the Confirmation Order shall constitute an order of the Bankruptcy Court approving such assumptions, assumptions and assignments, and the rejection of Executory Contracts and Unexpired Leases set forth in the Schedule of Rejected Executory Contracts and Unexpired Leases provided for in this Plan pursuant to sections 365 and 1123 of the Bankruptcy Code as of the Effective Date.

(c) To the extent any provision in any Executory Contract or Unexpired Lease assumed or assumed and assigned (as applicable) pursuant to this Plan or any prior order of the Bankruptcy Court (including, without limitation, any "change in control" provision, "change of control" provision, or provision with words of similar import) prohibits, restricts or conditions, or purports to prohibit, restrict or condition, or is modified, breached or terminated, or deemed modified, breached or terminated by, (i) the commencement of the Chapter 11 Cases or the insolvency or financial condition of any Debtor at any time before the closing of its respective Chapter 11 Case, (ii) any Debtor's or any Reorganized Debtor's assumption or assumption and assignment (as applicable) of such Executory Contract or Unexpired Lease or (iii) the Confirmation or consummation of this Plan, then such provision shall be deemed modified such that the transactions contemplated by this Plan shall not entitle the non-Debtor party thereto to modify or terminate such Executory Contract or Unexpired Lease or to exercise any other default-related rights or remedies with respect thereto, and any required consent under any such contract or lease shall be deemed satisfied by the Confirmation of this Plan.

(d) Each Executory Contract and Unexpired Lease assumed and/or assigned pursuant to this Plan shall revest in and be fully enforceable by the applicable Reorganized Debtor or the applicable assignee in accordance with its terms and conditions, except as modified by the provisions of this Plan, any order of the Bankruptcy Court approving its assumption and/or assignment, or applicable law.

(e) The Debtors reserve the right, on or before the Effective Date, to amend the Schedule of Rejected Executory Contracts and Unexpired Leases and/or to add or remove any Executory Contract and Unexpired Lease; *provided*, the Debtors or Reorganized Debtors, as applicable, may (with the prior written consent of the Required Consenting First Lien Lenders) amend the Schedule of Rejected Executory Contracts or Unexpired Leases to add or delete any Executory Contracts or Unexpired Leases after such date to the extent agreed to by the relevant counterparties or approved by an order of the Bankruptcy Court.

(f) The inclusion or exclusion of a contract or lease on any schedule or exhibit shall not constitute an admission by any Debtor that such contract or lease is an Executory Contract or Unexpired Lease or that any Debtor has any liability thereunder.

8.2. ***Payments Related to Assumption of Executory Contracts and Unexpired Leases***. Any monetary defaults under each Executory Contract and Unexpired Lease to be assumed or assumed and assigned pursuant to this Plan shall be satisfied, pursuant to section 365(b)(1) of the Bankruptcy Code, by payment of the amount of the Cure Claim in Cash on the Effective Date or on such other terms as the parties to such Executory Contracts or Unexpired Leases may otherwise agree. In the event of a dispute regarding: (a) the amount of any Cure Claim; (b) the ability of the Reorganized Debtors to provide "adequate assurance of future performance" (within the meaning of section 365 of the Bankruptcy Code), if applicable, under the Executory Contract or the Unexpired Lease to be assumed; or (c) any other matter pertaining to assumption, the Cure Claims shall be paid following the entry of a Final Order resolving the

dispute and approving the assumption of such Executory Contracts or Unexpired Leases; *provided*, that the Debtors or the Reorganized Debtors, as applicable, may settle any dispute regarding the amount of any Cure Claim without any further notice to or action, order or approval of the Bankruptcy Court.

8.3. ***Claims on Account of the Rejection of Executory Contracts or Unexpired Leases***.

(a) All Proofs of Claim with respect to Claims arising from the rejection of Executory Contracts or Unexpired Leases, pursuant to this Plan or the Confirmation Order, if any, must be Filed with the Bankruptcy Court within twenty-one (21) days after service of an order of the Bankruptcy Court (including the Confirmation Order) approving such rejection. Any Claim arising from the rejection of Executory Contracts or Unexpired Leases that becomes an Allowed Claim is classified and shall be treated as a General Unsecured Claim.

(b) Any Person or Entity that is required to File a Proof of Claim arising from the rejection of an Executory Contract or an Unexpired Lease that fails to timely do so shall be forever barred, estopped and enjoined from asserting such Claim, and such Claim shall not be enforceable, against the Debtors, the Reorganized Debtors or the Estates, and the Debtors, the Reorganized Debtors and their Estates and their respective Assets and property shall be forever discharged from any and all indebtedness and liability with respect to such Claim unless otherwise ordered by the Bankruptcy Court or as otherwise provided herein. All such Claims shall, as of the Effective Date, be subject to the permanent injunction set forth in Article X, Section 10.5 hereof.

8.4. ***Survival of the Debtors' Indemnification Obligations***.

Except as otherwise provided in this Plan or the Confirmation Order, and subject to the Schedule of Retained Causes of Action, to the fullest extent permitted by applicable law, the Indemnification Obligations shall not be discharged, impaired, or otherwise affected by this Plan; *provided*, that the Debtors or the applicable Reorganized Debtors, as applicable, shall not indemnify any such officers, directors, agents, or employees of the Debtors for any Claims or Causes of Action arising out of or relating to any act or omission for which indemnification is barred under applicable law or that is excluded under the terms of the foregoing organizational documents or applicable agreements governing the Debtors' Indemnification Obligations. Except as otherwise provided in this Plan, all such Indemnification Obligations shall be deemed and treated as Executory Contracts that are assumed by the Debtors under this Plan. Notwithstanding anything to the contrary set forth in this Section 8.4 of this Plan or elsewhere, the Debtors and the Reorganized Debtors, as applicable, shall not be obligated to indemnify and hold harmless any Entity for any claim, cause of action, liability, judgment, settlement, cost or expense of the Non-Released Parties (as defined in the Plan Supplement).

8.5. ***Employee Plans***.

(a) All Employee Plans that exist as of the Petition Date shall be assumed on the Effective Date as Executory Contracts pursuant to sections 365 and 1123 of the Bankruptcy Code. For the avoidance of doubt, the assumption of any Employee Plans shall not trigger any applicable change of control, immediate vesting, termination, or similar provisions therein, including any right to severance pay in connection with a change in control. For the avoidance of doubt, unless expressly agreed to in writing between the Debtors and the Required Consenting First Lien Lenders (except as provided in the Restructuring Support Agreement) if an Employee Plan provides in part for an award or potential award of Interests or consideration based on the value of Interests that have not vested into Existing Parent Equity Interests as of the Petition Date, such Employee Plan shall be assumed in all respects other than the

provisions of such agreement relating to Interest awards, which interest awards shall be canceled and discharged.

(b) As of the Effective Date, the Debtors and the Reorganized Debtors shall continue to honor their obligations under all applicable workers' compensation programs and in accordance with all applicable workers' compensation Laws in states in which the Reorganized Debtors operate. Any Claims arising under workers' compensation programs shall be deemed withdrawn once satisfied without any further notice to or action, order, or approval of the Bankruptcy Court; *provided*, that nothing in this Plan shall limit, diminish, or otherwise alter the Debtors' or Reorganized Debtors' defenses, Causes of Action, or other rights under applicable law, including non-bankruptcy Law, with respect to any such workers' compensation programs; *provided further*, that nothing herein shall be deemed to impose any obligations on the Debtors in addition to what is provided for under applicable state Law.

8.6. ***Insurance Policies***.

(a) All insurance policies to which any Debtor is a party as of the Effective Date, including any D&O Policy, shall be deemed to be and treated as Executory Contracts and shall be assumed by the applicable Debtors or the Reorganized Debtors and shall continue in full force and effect thereafter in accordance with their respective terms and shall survive unimpaired under this Plan, and all such insurance policies shall vest in the Reorganized Debtors. Coverage for defense and indemnity under the D&O Policies shall remain available to all individuals within the definition of "Insured" in any D&O Policy.

(b) In addition, after the Effective Date, all officers, directors, agents, or employees who served in such capacity at any time before the Effective Date shall be entitled to the full benefits of any D&O Policy (including any "tail" policy) for the full term of such policy regardless of whether such officers, directors, agents, and/or employees remain in such positions after the Effective Date, in each case, to the extent set forth in such policies and on terms no less favorable than the Debtors' existing policies.

(c) In addition, after the Effective Date, the Reorganized Debtors shall not terminate or otherwise reduce the coverage under any D&O Policy (including any "tail policy") in effect as of the Petition Date, and any current and former directors, officers, members, managers, agents or employees of any of the Debtors who served in such capacity at any time prior to the Effective Date shall be entitled to the full benefits of any such D&O Policy for the full term of such policy regardless of whether such members, managers, directors, and/or officers remain in such positions after the Effective Date to the extent set forth in such policies.

(d) In the event that the Debtors determine that an Allowed Claim is covered in full or in part under one of the Debtors' insurance policies, no distributions under this Plan shall be made on account of such Allowed Claim unless and until, and solely to the extent that, (i) the Holder of such Allowed Claim has exhausted all remedies with respect to such insurance policy, and (ii) an insurer authorized to issue a coverage position under such insurance policy, or the agent of such insurer, issues a formal determination, which the Debtors in their sole discretion do not contest, that coverage under such insurance policy is excluded or otherwise unavailable for losses arising from such Allowed Claim. Any proceeds available pursuant to one of the Debtors' insurance policies shall reduce the Allowed amount of a Claim on a dollar-for-dollar basis. To the extent that one or more of the Debtors' insurers agrees to satisfy a Claim in full or in part (if and to the extent adjudicated by a court of competent jurisdiction), then immediately upon such insurers' agreement, the applicable portion of such Claim may be expunged without a Claim objection having to be Filed and without any further notice to or action, order, or approval of the Bankruptcy Court. If an applicable insurance policy has a SIR, the Holder of an Insured Claim shall have an Allowed General Unsecured Claim or a Subordinated Claim, as applicable, solely up to the amount of the SIR that may be established upon the liquidation of the Insured Claim. Such SIR shall be considered satisfied

pursuant to this Plan through allowance of the General Unsecured Claim or Subordinated Claim, as applicable, solely in the amount of the applicable SIR, if any; *provided*, that nothing herein obligates the Debtors or the Reorganized Debtors to otherwise satisfy any SIR under any insurance policy. Any recovery on account of the Insured Claim in excess of the SIR established upon the liquidation of the Claim shall be recovered solely from the Debtors' insurance coverage, if any, and only to the extent of available insurance coverage and any proceeds thereof. Nothing in this Plan shall be construed to limit, extinguish, or diminish the insurance coverage that may exist or shall be construed as a finding that liquidated any Claim payable pursuant to an insurance policy.

8.7. ***Assignment***.

To the extent provided under the Bankruptcy Code or other applicable law, any Executory Contract or Unexpired Lease assumed and assigned, or otherwise transferred, hereunder shall remain in full force and effect for the benefit of the transferee or assignee in accordance with its terms, notwithstanding any provision in such Executory Contract or Unexpired Lease (including those of the type set forth in section 365(b)(2) of the Bankruptcy Code) that prohibits, restricts, or conditions such transfer or assignment. To the extent provided under the Bankruptcy Code or other applicable law, any provision that prohibits, restricts, or conditions the assignment or transfer of any such Executory Contract or Unexpired Lease or that terminates or modifies such Executory Contract or Unexpired Lease or allows the counterparty to such Executory Contract or Unexpired Lease to terminate, modify, recapture, impose any penalty, condition renewal or extension, or modify any term or condition upon any such transfer and assignment, constitutes an unenforceable anti-assignment provision and is void and of no force or effect.

8.8. ***Modifications, Amendments, Supplements, Restatements, or Other Agreements***.

Unless otherwise provided herein or by separate order of the Bankruptcy Court, each Executory Contract and Unexpired Lease that is assumed shall include any and all modifications, amendments, supplements, restatements, or other agreements made directly or indirectly by any agreement, instrument, or other document that in any manner affects such Executory Contract or Unexpired Lease.

8.9. ***Reservation of Rights***.

(a) Neither the exclusion nor inclusion of any contract or lease by the Debtors on any exhibit, schedule, or other annex to this Plan or in the Plan Supplement, nor anything contained in this Plan, will constitute an admission by the Debtors that any such contract or lease is or is not in fact an Executory Contract or Unexpired Lease or that the Debtors or the Reorganized Debtors or their respective Affiliates has any liability thereunder.

(b) Except as otherwise provided in this Plan, nothing in this Plan will waive, excuse, limit, diminish, or otherwise alter any of the defenses, claims, Causes of Action, or other rights of the Debtors and the Reorganized Debtors under any executory or non-Executory Contract or any Unexpired Lease or expired lease.

(c) Nothing in this Plan will increase, augment, or add to any of the duties, obligations, responsibilities, or liabilities of the Debtors or the Reorganized Debtors under any executory or non-Executory Contract or any Unexpired Lease or expired lease.

(d) If there is a dispute regarding a Cure Claim or whether a contract or lease is or was executory or unexpired at the time of assumption or rejection under this Plan, the Debtors or Reorganized Debtors, as applicable, shall have sixty (60) days following entry of a Final Order resolving such dispute to alter their treatment of such contract or lease by Filing a notice indicating such altered treatment.

ARTICLE IX.

CONDITIONS PRECEDENT TO CONSUMMATION OF THIS PLAN.

9.1. ***Conditions Precedent to the Effective Date***.

(a) The effectiveness of this Plan will be subject to the satisfaction or waiver in writing of customary conditions to effectiveness, as well as such other conditions as may be agreed by the Debtors and the Required Consenting Creditors, including the conditions precedent to effectiveness set forth in Article IX (as applicable, collectively, the "*Conditions Precedent*").

(b) The following are Conditions Precedent to the Effective Date of this Plan; *provided*, that each condition precedent may be waived by the Debtors with the consent of the Required Consenting Creditors, in each case, with such consent rights being exercised in accordance with the Restructuring Support Agreement:

(i) The Restructuring Support Agreement shall not have been terminated as to the Required Consenting First Lien Lenders or Required Consenting Second Lien Noteholders, and shall be in full force and effect;

(ii) The Bankruptcy Court shall have entered the Final DIP Order, which order shall not have been reversed, stayed, amended, modified, dismissed, vacated, or reconsidered;

(iii) The Bankruptcy Court shall have entered the Confirmation Order, and such Confirmation Order shall not have been reversed, stayed, amended, modified, dismissed, vacated, or reconsidered;

(iv) The Exit Facilities Documents shall have been entered into by the Reorganized Debtors, and all conditions precedent to the effectiveness of the Exit Facilities Documents, other than the occurrence of the Effective Date, shall have been satisfied or waived in accordance with the terms thereof, such that the Exit Facilities Documents will be in full force and effect on the occurrence of the Effective Date;

(v) All Restructuring Expenses shall have been paid in full in Cash in accordance with the terms of this Plan and the Restructuring Support Agreement;

(vi) The Definitive Documents (a) shall be consistent with the Restructuring Term Sheet and the Restructuring Support Agreement and otherwise approved by the applicable parties thereto consistent with their respective consent and approval rights as set forth in the Restructuring Support Agreement, (b) shall have been executed or deemed executed and delivered by each party thereto, and any conditions precedent related thereto shall have been satisfied or waived by the applicable party thereto, and (c) to the extent applicable, shall be adopted by the applicable Entity on terms consistent with the Restructuring Support Agreement and the Restructuring Term Sheet;

(vii) All governmental and third-party approvals and consents necessary, if any, in connection with the transactions contemplated by the Restructuring Term Sheet and the Restructuring Support Agreement shall have been obtained, not subject to unfulfilled conditions, and be in full force and effect, and all applicable waiting periods shall have expired without action being taken or threatened by any competent authority that would restrain, prevent or otherwise impose materially adverse conditions on such transactions;

(viii) The Debtors shall have implemented the Restructuring Transactions and all transactions contemplated by this Plan; and

(ix) The Professional Fee Escrow shall have been established and funded in full in Cash.

9.2. ***Timing of Conditions Precedent***.

Notwithstanding when a Condition Precedent to the Effective Date occurs, for the purposes of this Plan, such Condition Precedent shall be deemed to have occurred simultaneously upon the completion of the Conditions Precedent to the Effective Date; *provided*, that to the extent a Condition Precedent (the "***Prerequisite Condition***") may be required to occur prior to another Condition Precedent (a "***Subsequent Condition***") then, for purposes of this Plan, the Prerequisite Condition shall be deemed to have occurred immediately prior to the applicable Subsequent Condition regardless of when such Prerequisite Condition or Subsequent Condition shall have occurred.

9.3. ***Waiver of Conditions Precedent***.

(a) Each of the Conditions Precedent of this Plan may be waived in writing by the Debtors and the Required Consenting First Lien Lenders (except as otherwise provided in the Restructuring Support Agreement); *provided*, that the waiver of the Condition Precedent in Article IX, Section 9.1(b)(ix) shall require the consent of the affected Professionals; *provided*, *further*, that the waiver of the Condition Precedent in Article IX, Section 9.1(b)(v) shall require the consent of the affected First Lien Agent or Second Lien Notes Trustee, as applicable and each with respect to payment of their respective Restructuring Expenses.

(b) The stay of the Confirmation Order pursuant to Bankruptcy Rule 3020(e) shall be deemed waived by and upon the entry of the Confirmation Order, and the Confirmation Order shall take effect immediately upon its entry.

9.4. ***Effect of Non-Occurrence of the Effective Date***.

If the Effective Date does not occur, this Plan shall be null and void in all respects and nothing contained in this Plan or the Disclosure Statement shall (a) constitute a waiver or release of any Claims by or against or any Interests in the Debtors, (b) prejudice in any manner the rights of any Entity, or (c) constitute an admission, acknowledgement, offer, or undertaking by the Debtors, any of the Consenting Creditors, or any other Entity.

ARTICLE X.

EFFECT OF CONFIRMATION AND CONSUMMATION OF PLAN.

10.1. ***Vesting of Assets in the Reorganized Debtors***.

Except as otherwise provided herein, or in any agreement, instrument, or other documents incorporated into this Plan, on the Effective Date, pursuant to section 1141(b) and (c) other applicable provisions of the Bankruptcy Code, all property in each Debtor's Estate, all Causes of Action, and any property acquired by any of the Debtors under this Plan shall vest in each respective Reorganized Debtor, free and clear of all Liens, Claims, charges, or other encumbrances unless expressly provided otherwise by this Plan or Confirmation Order and subject to the terms of the Definitive Documents. For the avoidance of doubt, all rights, benefits, and protections provided to any of the Debtors or their Estates pursuant to this

Plan, the Plan Supplement, or the Confirmation Order including the release, exculpation, and injunction provisions provided in Article X of this Plan, shall vest in each respective Reorganized Debtor unless expressly provided otherwise by this Plan or the Confirmation Order. On and after the Effective Date, except as otherwise provided herein, each Reorganized Debtor may operate its business and may use, acquire, or dispose of property and pursue, compromise or settle any Claims, Interests, or Causes of Action without supervision or approval by the Bankruptcy Court and free of any restrictions of the Bankruptcy Code or Bankruptcy Rules. Without limiting the foregoing, the Reorganized Debtors may pay the charges that they incur on or after the Effective Date for professional fees, disbursements, expenses, or related support services without application to the Bankruptcy Court.

10.2. ***Binding Effect***.

As of the Effective Date, this Plan shall bind all Holders of Claims against and Interests in the Debtors and their respective successors and assigns, notwithstanding whether any such Holders were (a) Impaired or Unimpaired under this Plan, (b) presumed to accept or deemed to reject this Plan, (c) failed to vote to accept or reject this Plan, or (d) voted to reject this Plan.

10.3. ***Discharge of Claims and Termination of Interests***.

Pursuant to section 1141(d) of the Bankruptcy Code, and except as otherwise specifically provided in the Definitive Documents, this Plan or in a contract, instrument, or other agreement or document executed pursuant to this Plan, the distributions, rights, and treatment that are provided in this Plan shall be in complete satisfaction, discharge, and release, effective as of the Effective Date, of Claims, Interests, and Causes of Action of any nature whatsoever, including any interest accrued on Claims or Interests from and after the Petition Date, whether known or unknown, against, liabilities of, Liens on, obligations of, rights against, and interests in, the Debtors or any of their Assets or properties, regardless of whether any property shall have been distributed or retained pursuant to this Plan on account of such Claims and Interests, including demands, liabilities, and Causes of Action that arose before the Effective Date, any contingent or non-contingent liability on account of representations or warranties issued on or before the Effective Date, and all debts of the kind specified in sections 502(g), 502(h), or 502(i) of the Bankruptcy Code, in each case whether or not (i) a Proof of Claim based upon such debt or right is Filed or deemed Filed pursuant to section 501 of the Bankruptcy Code; (ii) a Claim or Interest based upon such debt, right, or Interest is Allowed pursuant to section 502 of the Bankruptcy Code; or (iii) the Holder of such a Claim or Interest has voted to accept this Plan. Any default or "event of default" by the Debtors with respect to any Claim or Interest that existed immediately before or on account of the filing of the Chapter 11 Cases shall be deemed cured (and no longer continuing) as of the Effective Date with respect to a Claim that is Unimpaired by this Plan. The Confirmation Order shall be a judicial determination of the discharge of all Claims and Interests subject to the Effective Date occurring.

10.4. ***Term of Injunctions or Stays***.

Unless otherwise provided herein or in a Final Order of the Bankruptcy Court, all injunctions or stays arising under or entered during the Chapter 11 Cases under section 105 or 362 of the Bankruptcy Code, or otherwise, and in existence on the Confirmation Date, shall remain in full force and effect until the later of the Effective Date and the date indicated in the order providing for such injunction or stay.

10.5. ***Permanent Injunction***.

Except as otherwise expressly provided in the Restructuring Support Agreement, this Plan or the Confirmation Order, from and after the Effective Date, all Persons are, to the fullest extent permitted under Section 524 and other applicable provisions of the Bankruptcy Code, permanently enjoined from (a)

commencing or continuing, in any manner or in any place, any suit, action or other proceeding of any kind; (b) enforcing, attaching, collecting, or recovering in any manner or means any judgment, award, decree, or order; (c) creating, perfecting, or enforcing any Lien or encumbrance; (d) asserting a right of setoff or subrogation of any kind; or (e) commencing or continuing in any manner any action or other proceeding of any kind, in each case on account of or with respect to any Claim, demand, liability, obligation, debt, right, Cause of Action, Interest, or remedy released or to be released, exculpated or to be exculpated, settled or to be settled, or discharged or to be discharged pursuant to this Plan or the Confirmation Order against any Person so released, discharged, or exculpated (or the property or estate of any Person or Entity so released, discharged, or exculpated). All injunctions or stays provided for in the Chapter 11 Cases under Sections 105 or 362 of the Bankruptcy Code, or otherwise, and in existence on the Confirmation Date, shall remain in full force and effect until the Effective Date.

No Person may commence or pursue a Claim or Cause of Action, as applicable, of any kind against the Debtors, the Reorganized Debtors, the Exculpated Parties, or the Released Parties, as applicable, that relates to or is reasonably likely to relate to any act or omission in connection with, relating to, or arising out of a Claim or Cause of Action, as applicable, subject to Article IX hereof, without the Bankruptcy Court (a) first determining, after notice and a hearing, that such Claim or Cause of Action, as applicable, represents a colorable Claim of any kind, and (b) specifically authorizing such Person to bring such Claim or Cause of Action, as applicable, against any such Debtor, Reorganized Debtor, Exculpated Party, or Released Party, as applicable; provided, that the foregoing shall only apply to Claims or Causes of Action brought against a Released Party if such Person bringing such Claim or Cause of Action is a Releasing Party. At the hearing for the Bankruptcy Court to determine whether such Claim or Cause of Action represents a colorable Claim of any kind, the Bankruptcy Court may, or shall if any Debtor, Reorganized Debtor, Exculpated Party, Released Party, or other party in interest requests by motion (oral motion being sufficient), direct that such Person seeking to commence or pursue such Claim or Cause of Action File a proposed complaint with the Bankruptcy Court embodying such Claim or Cause of Action, such complaint satisfying the applicable Rules of Federal Procedure, including Rule 8 and Rule 9 (as applicable), which the Bankruptcy Court shall assess before making a determination. For the avoidance of doubt, any party that obtains such determination and authorization and subsequently wishes to amend the authorized complaint or petition to add any Claims or Causes of Action not explicitly included in the authorized complaint or petition must obtain authorization from the Bankruptcy Court before filing any such amendment in the court where such complaint or petition is pending. The Bankruptcy Court reserves jurisdiction to adjudicate any such claims to the maximum extent provided by the law.

10.6. ***Releases***.

(a) Releases by the Debtors.

To the fullest extent permitted by applicable law and approved by the Bankruptcy Court, and except as otherwise expressly set forth in this Plan or the Confirmation Order, pursuant to section 1123(b) of the Bankruptcy Code, as of the Effective Date, in exchange for good and valuable consideration, the adequacy of which is hereby confirmed, each of Debtors, Reorganized Debtors, Reorganized Parent, and the Estates, in each case on behalf of itself and its respective successors, assigns, and Representatives, and any and all other Persons who may purport to assert any Claim or Cause of Action, directly or derivatively, by, through, for, or because of the foregoing Persons, has and is deemed to have, forever and unconditionally released, and absolved each Released Party from any and all Claims, obligations, rights, suits, damages, and Causes of Action, remedies, and liabilities whatsoever whether known or unknown, foreseen or unforeseen, existing or hereinafter arising, in law, equity, or otherwise, including any derivative claims asserted or assertable on behalf of the Debtors, the Estates, Reorganized Parent, or the Reorganized Debtors, that such Entity would have been legally entitled to assert in its own right (whether individually or collectively) or on behalf of the Holder of any Claim against, or Interest in, a Debtor or other Entity, based on or relating

to, or in any manner arising from, in whole or in part, the Debtors, including (i) the governance, management, transactions, ownership, or operation of the Debtors or the Non-Debtor Affiliates, (ii) the purchase, acquisition, sale, merger or rescission of any business line, Assets, or Security of the Debtors or the Non-Debtor Affiliates, (iii) the subject matter of, or the transactions, events, circumstances, acts or omissions giving rise to, any Claim or Interest that is treated in the Restructuring Transactions, including the negotiation, formulation, or preparation of the Restructuring Transactions, (iv) the business or contractual arrangements between any Debtor or Non-Debtor Affiliate and any other Entity (including Consenting Creditors), (v) the Prepetition Funded Debt Documents, (vi) the Debtors' and Non-Debtor Affiliates' in- or out-of-court restructuring efforts, (vii) intercompany transactions, (viii) the formulation, preparation, dissemination, negotiation, solicitation, entry into, Filing, or consummation of this Plan, the Plan Supplement the Disclosure Statement, the Restructuring Support Agreement and related prepetition transactions, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, the New Corporate Governance Documents, the Chapter 11 Cases, or any Restructuring Transaction, (ix) any contract, instrument, release, or other agreement or document created or entered into in connection with this Plan, the Plan Supplement, the Disclosure Statement, the Restructuring Support Agreement, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, the New Corporate Governance Documents, the Chapter 11 Cases, the pursuit of Confirmation and consummation of the Plan, the administration and implementation of the Plan or Confirmation Order, including the issuance or distribution of securities pursuant to the Plan, (x) the distribution, including any disbursements made by a Distribution Agent, of property under this Plan, or any other related agreement, or (xi) any other act or omission, transaction, agreement, event, or other occurrence related to any of the foregoing and taking place on or before the Effective Date; *provided*, that the Debtors do not release Claims or Causes of Action (1) that are of a commercial nature and arise in the ordinary course of business, such as accounts receivable and accounts payable on account of goods being sold and services being performed; (2) arising under an Executory Contract or Unexpired Lease that is assumed by the Debtors; or (3) arising out of, or related to, any act or omission of a Released Party that is determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction to have constituted actual fraud, gross negligence, or willful misconduct (it being agreed that any Released Parties' consideration, approval, or receipt of any distribution did not arise from or relate to actual fraud (but not, for the avoidance of doubt, fraudulent transfers, gross negligence, or willful misconduct). Notwithstanding anything to the contrary in the foregoing, the Releases set forth above do not release (1) any obligations of any Person under this Plan, the Confirmation Order, any other Definitive Document, any Restructuring Transaction, any document, instrument, or agreement (including those set forth in the Plan Supplement) executed to implement this Plan or any agreement, Claim, or obligation arising or assumed under this Plan or (2) any Causes of Action specifically retained by the Debtors pursuant to the Schedule of Retained Causes of Action.

Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval, pursuant to Bankruptcy Rule 9019, of the Debtor Release, which includes by reference each of the related provisions and definitions contained in this Plan, and further, shall constitute the Bankruptcy Court's finding that the Debtor Release is: (1) in exchange for the good and valuable consideration provided by each of the Released Parties, including the Released Parties' substantial contributions to facilitating the Restructuring Transactions and implementing this Plan; (2) a good-faith settlement and compromise of the Claims released by the Debtors; (3) in the best interests of the Debtors and all Holders of Claims and Interests; (4) fair, equitable, and reasonable; (5) given and made after due notice and opportunity for hearing; and (6) a bar to any of the Debtors, the Reorganized Debtors, the Reorganized Parent or the Debtors' Estates asserting any Claim or Cause of Action released pursuant to the Debtor Release.

(b) Releases by Holders of Claims and Interests.

To the fullest extent permitted by applicable law and approved by the Bankruptcy Court, and except as otherwise expressly set forth in this Plan or the Confirmation Order, as of the Effective Date, in exchange

for good and valuable consideration, the adequacy of which is hereby confirmed, each Releasing Party, in each case on behalf of itself and its respective successors, assigns, and Representatives, and any and all other Persons who may purport to assert any Claim or Cause of Action, directly or derivatively, by, through, for, or because of the foregoing Persons, has and is deemed to have, forever and unconditionally, released, and absolved each Released Party from any and all Claims, obligations, rights, suits, damages, and Causes of Action, remedies, and liabilities whatsoever, whether known or unknown, foreseen or unforeseen, existing or hereinafter arising, in law, equity, or otherwise, including any derivative claims asserted or assertable on behalf of the Debtors, the Estates, the Reorganized Parent, or the Reorganized Debtors that such Person would have been legally entitled to assert in its own right (whether individually or collectively) or on behalf of the Holder of any Claim against, or Interest in, a Debtor or other Person, based on or relating to, or in any manner arising from, in whole or in part, the Debtors, including (i) the governance, management, transactions, ownership, or operation of the Debtors or the Non-Debtor Affiliates, (ii) the purchase, acquisition, sale, merger, or rescission of any business line, Assets, or Security of the Debtors or the Non-Debtor Affiliates, (iii) the subject matter of, or the transactions, events, circumstances, acts or omissions giving rise to, any Claim or Interest that is treated in the Restructuring Transactions, including the negotiation, formulation, or preparation of the Restructuring Transactions, (iv) the business or contractual arrangements between any Debtor or Non-Debtor Affiliate and any other Person (including Consenting Creditors), (v) the Prepetition Funded Debt Documents, (vi) the Debtors' and Non-Debtor Affiliates' in- or out-of-court restructuring efforts, (vii) intercompany transactions, (viii) the formulation, preparation, dissemination, negotiation, solicitation, entry into, Filing, or consummation of this Plan, the Plan Supplement the Disclosure Statement, the Restructuring Support Agreement and related prepetition transactions, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, the New Corporate Governance Documents, the Chapter 11 Cases, or any Restructuring Transaction, (ix) any contract, instrument, release, or other agreement or document created or entered into in connection with this Plan, the Plan Supplement, the Disclosure Statement, the Restructuring Support Agreement, the Definitive Documents, the Equity Rights Offering Documents, the Corporate Governance Documents, or the New Corporate Governance Documents, the Chapter 11 Cases, the pursuit of Confirmation and consummation of the Plan, the administration and implementation of the Plan or Confirmation Order, including the issuance or distribution of securities pursuant to the Plan, (x) the distribution, including any disbursements made by a Distribution Agent, of property under this Plan, or any other related agreement, or (xi) any other act or omission, transaction, agreement, event, or other occurrence related to any of the foregoing and taking place on or before the Effective Date; *provided*, that the Releasing Parties do not release Claims or Causes of Action (1) arising out of, or related to, any act or omission of a Released Party that is determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction to have constituted actual fraud (but not, for the avoidance of doubt, fraudulent transfers), gross negligence, or willful misconduct (it being agreed that any Released Parties' consideration, approval, or receipt of any distribution did not arise from or relate to actual fraud, gross negligence, or willful misconduct) or (2) against a Released Party arising from any obligations owed to the Releasing Party that are wholly unrelated to the Debtors, the Reorganized Parent, or the Reorganized Debtors. Notwithstanding anything to the contrary in the foregoing, the Releases set forth above do not release (1) any obligations of any Person under this Plan, the Confirmation Order, any other Definitive Document, any Restructuring Transaction, any document, instrument, or agreement (including those set forth in the Plan Supplement) executed to implement this Plan or any agreement, Claim, or obligation arising or assumed under this Plan or (2) any Causes of Action specifically retained by the Debtors pursuant to the Schedule of Retained Causes of Action.

Entry of the Confirmation Order shall constitute the Bankruptcy Court's approval, pursuant to Bankruptcy Rule 9019, of the Third-Party Release, which includes by reference each of the related provisions and definitions contained in this Plan, and, further, shall constitute the Bankruptcy Court's finding that the Third-Party Release is: (1) consensual; (2) given and made after due notice and opportunity

for hearing; and (3) a bar to any of the Releasing Parties asserting any Claim or Cause of Action released pursuant to the Third-Party Release.

10.7. ***Exculpation***.

Effective as of the Effective Date, to the fullest extent permitted by law, the Exculpated Parties shall neither have nor incur any liability to any Person for any Claims or Causes of Action for any act taken or omitted to be taken between the Petition Date and the Effective Date in connection with, or related to, formulating, negotiating, preparing, disseminating, implementing, administering, confirming or effecting the Confirmation or consummation (as applicable) of this Plan, the Restructuring Support Agreement and related prepetition transactions, and the Disclosure Statement including any disbursements made by a Distribution Agent in connection with this Plan, the Disclosure Statement, the Definitive Documents, the Corporate Governance Documents, the Prepetition Funded Debt Documents, or any Restructuring Transaction, contract, instrument, release, or other agreement or document created or entered into in connection with this Plan, or any other postpetition act taken or omitted to be taken in connection with or in contemplation of the restructuring of the Debtors, the approval of the Disclosure Statement or Confirmation or consummation of this Plan; *provided*, that the foregoing provisions of this exculpation shall not operate to waive or release: (a) any Claims or Causes of Action arising from willful misconduct, gross negligence, or actual fraud (but not, for the avoidance of doubt, fraudulent transfers) of such applicable Exculpated Party as determined by Final Order of the Bankruptcy Court or any other court of competent jurisdiction; and/or (b) the rights of any Person to enforce this Plan. and the contracts, instruments, releases, indentures, and other agreements and documents delivered under or in connection with this Plan, or assumed pursuant to this Plan or Final Order of the Bankruptcy Court; *provided further*, that each Exculpated Party shall be entitled to rely upon the advice of counsel concerning its respective duties pursuant to, or in connection with, the above referenced documents, actions, or inactions.

The Exculpated Parties have, and upon consummation of this Plan shall be deemed to have, participated in good faith and in compliance with the applicable laws with regard to the solicitation of votes and distribution of consideration pursuant to this Plan and, therefore, are not, and on account of such distributions shall not be, liable at any time for the violation of any applicable law, rule, or regulation governing the solicitation of acceptances or rejections of this Plan or such distributions made pursuant to this Plan.

The foregoing exculpation shall be effective as of the Effective Date without further notice to or order of the Bankruptcy Court, act, or action under applicable law, regulation, order, or rule or the vote, consent, authorization, or approval of any Person. For the avoidance of doubt and notwithstanding anything else herein, the foregoing exculpation shall be limited to Persons that served as Estate fiduciaries during the Chapter 11 Cases.

10.8. ***Retention of Causes of Action/Reservation of Rights***.

In accordance with section 1123(b) of the Bankruptcy Code, but subject in all respects to this Article X, the Reorganized Debtors shall have, retain, reserve and be entitled to assert, and may enforce all rights to commence and pursue, as appropriate, any and all claims or Causes of Action, whether arising before or after the Petition Date, including any actions specifically enumerated in the Schedule of Retained Causes of Action, and such rights to commence, prosecute, or settle such Causes of Action shall be preserved notwithstanding the occurrence of the Effective Date. The Reorganized Debtors shall have, retain, reserve, and be entitled to assert all rights of setoff or recoupment, and other legal or equitable defenses as fully as if the Chapter 11 Cases had not been commenced, and all of the Debtors' legal and equitable rights in respect of any Unimpaired Claim may be asserted after the Confirmation Date and Effective Date to the same extent as if the Chapter 11 Cases had not been commenced. The Debtors or the

Reorganized Debtors, as applicable, expressly reserve all rights to prosecute any and all Causes of Action against any Entity not released pursuant to this Plan or the Plan Supplement.

10.9. ***Ipso Facto and Similar Provisions Ineffective***.

Except to the extent otherwise allowed hereunder, any term of any prepetition policy, prepetition contract, or other prepetition obligation applicable to a Debtor shall be void and of no further force or effect with respect to any Debtor or Reorganized Debtor, as applicable, to the extent that such policy, contract, or other obligation is conditioned on, creates an obligation of the Debtor as a result of, or gives rise to a right of any Person based on any of the following: (a) the insolvency or financial condition of a Debtor; (b) the commencement of the Chapter 11 Cases; (c) the Confirmation or consummation of this Plan, including any change of control that shall occur as a result of such consummation; or (d) the restructuring.

10.10. ***Solicitation of Plan***.

As of and subject to the occurrence of the Confirmation Date: (a) the Debtors, the Exculpated Parties, and the Released Parties, as applicable, shall be deemed to have solicited acceptances of this Plan and to have acted in good faith and in compliance with the applicable provisions of the Bankruptcy Code, including sections 1125(a), (e), and (g) of the Bankruptcy Code, and any applicable non-bankruptcy law, rule, or regulation governing the adequacy of disclosure in connection with such solicitation; and (b) (i) the Debtors, (ii) the Consenting Creditors, and (iii) each of the Debtors and Consenting Creditors' respective directors, officers, employees, Affiliates, agents, financial advisors, investment bankers, professionals, accountants, and attorneys shall be deemed to have participated in good faith and in compliance with the applicable provisions of the Bankruptcy Code in the offer and issuance of any Securities under this Plan, and therefore, all of the foregoing parties, are not, and on account of such offer, issuance, and solicitation will not be, liable at any time for any violation of any applicable law, rule, or regulation governing the solicitation of acceptances or rejections of this Plan or the offer and issuance of any Securities under this Plan.

10.11. ***Corporate and Limited Liability Company Action***.

Upon the Effective Date, all actions contemplated by this Plan shall be deemed authorized and approved in all respects, including (a) the assumption of the Employee Plans assumed pursuant to Article VIII, Section 8.5(a), subject to Article VIII, Sections 8.5(a)-(b), (b) the selection of the managers, directors, and officers for the Reorganized Debtors, (c) the distribution of the Plan Securities, (d) the approval of the Restructuring Support Agreement and the Definitive Documents, and (e) all other actions contemplated by this Plan (whether to occur before, on, or after the Effective Date), in each case in accordance with and subject to the terms hereof. All matters provided for in this Plan involving the corporate or limited liability company structure of the Debtors or the Reorganized Debtors, and any corporate or limited liability company action required by the Debtors or the Reorganized Debtors in connection with this Plan shall be deemed to have occurred and shall be in effect, without any requirement of further action by the Holders of Collateral, directors, managers, or officers of the Debtors or the Reorganized Debtors. On or (as applicable) before the Effective Date, the appropriate officers of the Debtors or the Reorganized Debtors, as applicable, shall be authorized and empowered to issue, execute, and deliver the agreements, documents, Securities, and instruments contemplated by this Plan (or necessary or desirable to effect the transactions contemplated by this Plan) in the name of and on behalf of the Reorganized Debtors, including (w) the New Corporate Governance Documents and (x) any and all other agreements, documents, Securities, and instruments

relating to the foregoing. The authorizations and approvals contemplated by this Article X, Section 10.11 shall be effective notwithstanding any requirements under non-bankruptcy law.

10.12. ***SEC Reservation of Rights***.

Notwithstanding any language to the contrary contained in the Disclosure Statement, this Plan, and/or the Confirmation Order, no provision of the Disclosure Statement, this Plan or the Confirmation Order shall (i) preclude the United States Securities and Exchange Commission ("SEC") from enforcing its police or regulatory powers; or (ii) enjoin, limit, impair, or delay the SEC from commencing or continuing any claims, causes of action, proceedings or investigations against any non-debtor person or entity in any forum.

10.13. ***No Governmental Releases***.

Except as expressly provided for in this Plan, nothing in this Plan, the Confirmation Order, or other related Plan documents shall affect a release or limit any Claim arising solely under the enforcement of the police powers or regulatory activities of the United States Government or any of its agencies, or any state and local authority, whatsoever.

ARTICLE XI.

RETENTION OF JURISDICTION.

11.1. ***Retention of Jurisdiction***.

On and after the Effective Date, the Bankruptcy Court shall retain exclusive jurisdiction over all matters arising in, arising under, and related to the Chapter 11 Cases for, among other things, the following purposes:

(a) to hear and determine motions and/or applications for the assumption, assumption and assignment, or rejection of Executory Contracts and Unexpired Leases, including resolution of all disputes regarding Cure Claims, and the allowance, classification, priority, compromise, estimation, or payment of Claims resulting therefrom;

(b) to determine any motion, adversary proceeding, proceeding, application, contested matter, and other litigated matter pending on or commenced after the Confirmation Date;

(c) to hear and resolve any disputes arising from or related to (i) any orders of the Bankruptcy Court granting relief under Bankruptcy Rule 2004 or (ii) any protective orders entered by the Bankruptcy Court in connection with the foregoing;

(d) to ensure that distributions to Holders of Allowed Claims are accomplished as provided for in this Plan and Confirmation Order and to adjudicate any and all disputes arising from or relating to the manner of, or entitlement to, distributions under this Plan;

(e) to consider the allowance, classification, priority, compromise, estimation, or payment of any Claim or any counterclaim related thereto;

(f) to enter, implement or enforce such orders as may be appropriate in the event the Confirmation Order is for any reason stayed, reversed, revoked, modified, or vacated;

(g) to issue injunctions, enter and implement other orders, and take such other actions as may be necessary or appropriate to restrain interference by any Entity with the consummation, implementation, or enforcement of this Plan, the Confirmation Order, or any other order of the Bankruptcy Court;

(h) to hear and determine any application to modify this Plan in accordance with section 1127 of the Bankruptcy Code, to remedy any defect or omission or reconcile any inconsistency in this Plan, or any order of the Bankruptcy Court, including the Confirmation Order, in such a manner as may be necessary to carry out the purposes and effects thereof;

(i) to hear and determine all Professional Fee Claims;

(j) to hear and determine disputes arising in connection with or related to the interpretation, implementation, or enforcement of this Plan, the Plan Supplement, or the Confirmation Order or any agreement, instrument, or other document created by or in connection with, governing, or relating to any of the foregoing;

(k) to take any action and issue such orders as may be necessary to construe, interpret, enforce, implement, execute, and consummate this Plan;

(l) to determine such other matters and for such other purposes as may be provided in the Confirmation Order;

(m) to hear and determine matters concerning state, local, and federal taxes in accordance with sections 346, 505, and 1146 of the Bankruptcy Code (including any requests for expedited determinations under section 505(b) of the Bankruptcy Code);

(n) to hear and determine matters concerning Securities laws exemptions under section 1145 of the Bankruptcy Code;

(o) to hear, adjudicate, decide, or resolve any and all matters related to Article X of this Plan, including the releases, discharge, exculpations, and injunctions issued thereunder;

(p) to resolve disputes concerning Disputed Claims or the administration thereof;

(q) to resolve any disputes concerning whether a Person had sufficient notice of the Chapter 11 Cases, the Disclosure Statement, any solicitation conducted in connection with the Chapter 11 Cases, any claims bar date established in the Chapter 11 Cases, or any deadline for responding or objecting to a Cure Claim, in each case, for the purpose of determining whether a Claim or Interest is discharged hereunder or for any other purposes;

(r) to hear and determine any other matters related hereto and not inconsistent with the Bankruptcy Code and title 28 of the United States Code;

(s) to enter a final decree closing the Chapter 11 Cases;

(t) to recover all Assets of the Debtors and property of the Debtors' Estates, wherever located; and

(u) to hear and determine any rights, claims, or Causes of Action held by or accruing to the Debtors pursuant to the Bankruptcy Code or pursuant to any federal statute or legal theory.

11.2. ***Courts of Competent Jurisdiction***.

If the Bankruptcy Court abstains from exercising, or declines to exercise, jurisdiction or is otherwise without jurisdiction over any matter arising out of this Plan, such abstention, refusal, or failure of jurisdiction shall have no effect upon and shall not control, prohibit, or limit the exercise of jurisdiction by any other court having competent jurisdiction with respect to such matter.

ARTICLE XII.

MISCELLANEOUS PROVISIONS.

12.1. ***Payment of Statutory Fees***.

On the Effective Date and thereafter as may be required, the Reorganized Debtors shall pay all fees incurred pursuant to sections 1911 through 1930 of chapter 123 of title 28 of the United States Code, together with interest, if any, pursuant to § 3717 of title 31 of the United States Code for each Debtor's case, or until such time as a final decree is entered closing a particular Debtor's case, a Final Order converting such Debtor's case to a case under chapter 7 of the Bankruptcy Code is entered, or a Final Order dismissing such Debtor's case is entered.

12.2. ***Statutory Committee***.

On the Effective Date, the current and former members of the Committee, and their respective officers, employees, counsel, advisors and agents, will be released from all further authority, duties, responsibilities and obligations related to and arising from and in connection with the Chapter 11 Cases and the Committee will dissolve; provided, however, that following the Effective Date, the Committee will continue in existence and have standing and a right to be heard for the following limited purpose of pursuing Claims and final fee applications Filed pursuant to sections 330 and 331 of the Bankruptcy Code. Following the completion of the Committee's remaining duties set forth above, the Committee will be dissolved, and the retention or employment of the Committee's respective attorneys, accountants and other agents will terminate without further notice to, or action by, any Entity.

12.3. ***Substantial Consummation of this Plan***.

On the Effective Date, this Plan shall be deemed to be substantially consummated under sections 1101 and 1127(b) of the Bankruptcy Code.

12.4. ***Request for Expedited Determination of Taxes***.

The Debtors shall have the right to request an expedited determination under section 505(b) of the Bankruptcy Code with respect to tax returns Filed, or to be Filed, for any and all taxable periods ending after the Petition Date through the Effective Date, and in the case of any Debtor that is to be dissolved, through the completion of its dissolution.

12.5. ***Exemption from Certain Transfer Taxes***.

Pursuant to and to the fullest extent permitted by section 1146 of the Bankruptcy Code, (a) the issuance, transfer or exchange of any Securities, instruments or documents, (b) the creation, filing or recording of any Lien, mortgage, deed of trust, or other security interest, (c) the making, assignment, filing or recording of any lease or sublease or the making or delivery of any deed, bill of sale, assignment or other instrument of transfer under, pursuant to, in furtherance of, or in connection with this Plan, including any

deeds, bills of sale, or assignments executed in connection with any of the transactions contemplated under this Plan or the reinvesting, transfer, or sale of any real or personal property of the Debtors pursuant to, in implementation of or as contemplated in this Plan (whether to one or more of the Reorganized Debtors or otherwise), and (d) the issuance, renewal, modification, or securing of indebtedness by such means, and the making, delivery or recording of any deed or other instrument of transfer under, in furtherance of, or in connection with, this Plan, including the Confirmation Order, shall constitute a "transfer under a plan" within the purview of section 1146 of the Bankruptcy Code and shall not be subject to or taxed under any law imposing any stamp or similar tax, including any document recording tax, conveyance fee, mortgage tax, real estate transfer tax, mortgage recording tax, Uniform Commercial Code filing or recording fee, regulatory filing or recording fee, sales tax, use tax, or other similar governmental assessment. Consistent with the foregoing, each recorder of deeds or similar official, officer or agent for any county, city, or Governmental Unit in which any instrument hereunder is to be recorded shall, pursuant to the Confirmation Order, be ordered and directed to accept such instrument without requiring the payment of any filing fees, documentary stamp tax, deed stamps, transfer tax, intangible tax, or other stamp or similar taxes.

12.6. ***Amendments***.

(a) *Plan Modifications*. Subject to the consent rights set forth in the Restructuring Support Agreement, this Plan may be amended, modified, or supplemented by the Debtors in the manner provided for by section 1127 of the Bankruptcy Code or as otherwise permitted by applicable law without additional disclosure pursuant to section 1125 of the Bankruptcy Code. In addition, after the Confirmation Date, so long as such action does not materially and adversely affect the treatment of Holders of Allowed Claims or Interests pursuant to this Plan, subject to the consent rights set forth in the Restructuring Support Agreement, the Debtors may remedy any defect or omission or reconcile any inconsistencies in this Plan or the Confirmation Order with respect to such matters as may be necessary to carry out the purposes of effects of this Plan, and any Holder of a Claim or Interest that has accepted this Plan shall be deemed to have accepted this Plan as amended, modified, or supplemented.

(b) *Other Amendments*. Subject to the consent rights set forth in the Restructuring Support Agreement, before the Effective Date, the Debtors may make technical adjustments and modifications to this Plan and the documents contained in the Plan Supplement without further order or approval of the Bankruptcy Court.

12.7. ***Effectuating Documents and Further Transactions***.

Each of the officers of the Reorganized Debtors is authorized, in accordance with his or her authority under the resolutions of the applicable board of directors or managers, to execute, deliver, File, or record such contracts, instruments, releases, indentures, and other agreements or documents and take such actions as may be necessary or appropriate to effectuate and further evidence the terms and conditions of this Plan.

12.8. ***Revocation or Withdrawal of this Plan***.

The Debtors reserve the right to revoke or withdraw this Plan prior to the Effective Date as to any or all of the Debtors with the consent of the Required Consenting First Lien Lenders (except as provided in the Restructuring Support Agreement); *provided*, that the Debtors may revoke or withdraw this Plan without such consent in the exercise of the Debtors' fiduciary duty or as otherwise permitted under the Restructuring Support Agreement. If, with respect to a Debtor, this Plan has been revoked or withdrawn prior to the Effective Date, or if Confirmation or the occurrence of the Effective Date as to such Debtor does not occur on the Effective Date, then, with respect to such Debtor: (a) this Plan shall be null and void in all respects; (b) any settlement or compromise embodied in this Plan (including the fixing or limiting to an amount any

Claim or Interest or Class of Claims or Interests), assumption of Executory Contracts or Unexpired Leases affected by this Plan, and any document or agreement executed pursuant to this Plan shall be deemed null and void; and (c) nothing contained in this Plan shall (i) constitute a waiver or release of any Claim by or against, or any Interest in, such Debtor or any other Entity; (ii) prejudice in any manner the rights of such Debtor or any other Entity; or (iii) constitute an admission of any sort by any Debtor, any of the Consenting Creditors, or any other Entity.

12.9. ***Severability of Plan Provisions***.

If, before the entry of the Confirmation Order, any term or provision of this Plan is held by the Bankruptcy Court to be invalid, void, or unenforceable, the Bankruptcy Court, at the request of the Debtors and with the consent of the Required Consenting First Lien Lenders (except as provided in the Restructuring Support Agreement), shall have the power to alter and interpret such term or provision to make it valid or enforceable to the maximum extent practicable, consistent with the original purpose of the term or provision held to be invalid, void, or unenforceable, and such term or provision shall then be applicable as altered or interpreted; *provided* that any such alteration or interpretation shall be consistent with the Restructuring Support Agreement and the remainder of the terms and provisions of this Plan will remain in full force and effect and will in no way be affected, impaired, or invalidated by such holding, alteration, or interpretation. The Confirmation Order shall constitute a judicial determination and shall provide that each term and provision of this Plan, as it may have been altered or interpreted in accordance with the foregoing, is (a) valid and enforceable pursuant to its terms, (b) integral to this Plan and may not be deleted or modified without the consent of the Debtors or the Reorganized Debtors (as the case may be), and (c) non-severable and mutually dependent.

12.10. ***Governing Law***.

Except to the extent that the Bankruptcy Code or other federal law is applicable, or to the extent an exhibit hereto or a Definitive Document provides otherwise, the rights, duties, and obligations arising under this Plan shall be governed by, and construed and enforced in accordance with, the laws of the State of New York, without giving effect to the principles of conflict of laws thereof.

12.11. ***Time***.

In computing any period of time prescribed or allowed by this Plan, unless otherwise set forth herein or determined by the Bankruptcy Court, the provisions of Bankruptcy Rule 9006 shall apply.

12.12. ***Dates of Actions to Implement this Plan***.

In the event that any payment or act under this Plan is required to be made or performed on a date that is on a Business Day, then the making of such payment or the performance of such act may be completed on or as soon as reasonably practicable after the next succeeding Business Day, but shall be deemed to have been completed as of the required date.

12.13. ***Immediate Binding Effect***.

Notwithstanding any Bankruptcy Rule providing for a stay of the Confirmation Order or Plan, including Bankruptcy Rules 3020(e), 6004(h), 7062, or otherwise, upon the occurrence of the Effective Date, the terms of this Plan and Plan Supplement shall be immediately effective and enforceable and deemed binding upon and inure to the benefit of the Debtors, the Holders of Claims and Interests, the Released Parties, and each of their respective successors and assigns, including the Reorganized Debtors, all Entities that are parties to or are subject to the settlements, compromises, releases, and injunctions

described in this Plan, and any and all non-Debtor parties to Executory Contracts and Unexpired Leases with the Debtors. All Claims shall be as fixed, adjusted, or compromised, as applicable, pursuant to this Plan regardless of whether any Holder of a Claim, Interest, or debt has voted on this Plan.

12.14. ***Deemed Acts***.

Subject to and conditioned on the occurrence of the Effective Date, whenever an act or event is expressed under this Plan to have been deemed done or to have occurred, it shall be deemed to have been done or to have occurred without any further act by any party, by virtue of this Plan and the Confirmation Order.

12.15. ***Successor and Assigns***.

The rights, benefits, and obligations of any Entity named or referred to in this Plan shall be binding on, and shall inure to the benefit of any heir, executor, administrator, successor, or permitted assign, if any, of each Entity.

12.16. ***Entire Agreement***.

On the Effective Date, this Plan, the Plan Supplement, and the Confirmation Order shall supersede all previous and contemporaneous negotiations, promises, covenants, agreements, understandings, and representations on such subjects, all of which have become merged and integrated into this Plan.

12.17. ***Exhibits to Plan***.

All exhibits, schedules, supplements, and appendices to this Plan (including the Plan Supplement) are incorporated into and are a part of this Plan as if set forth in full herein.

12.18. ***Notices***.

All notices, requests, and demands to or upon the Debtors to be effective shall be in writing (including by electronic transmission) and, unless otherwise expressly provided herein, shall be deemed to have been duly given or made when actually delivered or addressed as follows:

(a) if to the Debtors or the Reorganized Debtors:

ModivCare Inc.
6900 E Layton Ave, Suite 1100 & 1200
Denver, CO 80237
Faisal Khan (Faisal.Khan@modivcare.com)

with a copy (which will not constitute notice) to:

Latham & Watkins LLP
1271 Avenue of the Americas
New York, NY 10020
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(b) if to the Consenting Creditors, to:

Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Kris Hansen (krishansen@paulhastings.com)

and

Paul Hastings LLP
71 S Wacker Drive, Floor 45
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Matt Warren (mattwarren@paulhastings.com)
Lindsey Henrikson (lindsey.henrikson@paulhastings.com)

After the Effective Date, the Debtors and the Reorganized Debtors, as applicable, are authorized to limit the list of Persons receiving documents pursuant to Bankruptcy Rule 2002, to those persons who have filed after Confirmation a renewed request to receive documents pursuant to Bankruptcy Rule 2002.

[*Remainder of page intentionally left blank.*]

Dated: December 5, 2025

Respectfully submitted,

By: */s/ Chad J. Shandler*
Name: Chad J. Shandler
Title: Chief Transformation Officer

On behalf of ModivCare Inc. and its Debtor Affiliates

Exhibit B

Form of Effective Date Notice

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
Debtors.[1]	:	(Jointly Administered)

NOTICE OF (I) ENTRY OF ORDER CONFIRMING SECOND AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES, (II) OCCURRENCE OF SUCH PLAN'S EFFECTIVE DATE, AND (III) RELATED DEADLINES WITH RESPECT TO ADMINISTRATIVE EXPENSE AND REJECTION DAMAGE CLAIMS

THE LEGAL PROCEEDINGS AND TRANSACTIONS DESCRIBED IN THIS NOTICE (THIS "*NOTICE*") MAY AFFECT YOUR RIGHTS. PLEASE READ THE BELOW CAREFULLY AND TAKE NOTICE THAT:

On December 5, 2025, ModivCare Inc. and its debtor affiliates (collectively, the "***Debtors***" or the "***Reorganized Debtors***", as applicable) filed the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (together with the Plan Supplement, in each case as amended, modified, or supplemented from time to time, the "***Plan***").[2]

The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") held a hearing to consider confirmation of the Plan which commenced on December 8, 2025, and concluded on [●]. On [●], the Court entered the *Order (I) Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of 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. [●]] (the "***Confirmation Order***"). Pursuant to its terms, the Plan was substantially consummated and became effective on [●] (the "***Plan Effective Date***").

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[1] A complete list of each of the Debtors in the 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.'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.

[2] Capitalized terms used in this Notice but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

Deadlines for Filing Administrative Claims and Contract Rejection Claims

On **[●]**, at [●] p.m. (Prevailing Central Time) (the "***Administrative Claims Bar Date***") was established by the Court as the deadline by which holders of Administrative Claims must file proofs of administrative claim against the Reorganized Debtors. The proof of administrative claim form (the "***Proof of Administrative Claim Form***") is available free of charge on the website of the Reorganized Debtors' claims and noticing agent Kurtzman Carson Consultants, LLC (d/b/a Verita Global) (the "***Claims and Noticing Agent***"): https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare (the "***Restructuring Website***").

Holders of the following Administrative Claims are **not** required to file a Proof of Administrative Claim on or before the Administrative Claims Bar Date solely with respect to such Administrative Claim: (i) an Administrative Claim against the Reorganized Debtors for which a signed proof of administrative claim has already been properly filed with the Clerk of the Court or the Claims and Noticing Agent in a form substantially similar to the Proof of Administrative Claim Form; (ii) an Administrative Claim that has been previously allowed, and/or paid in full by the Debtors, in accordance with the Bankruptcy Code or an order of the Court, (iii) an Administrative Claim that constitutes a Professional Fee Claim, and (iv) any claim of any "governmental unit," as that term is defined under the Bankruptcy Code, under section 503(b)(1)(D) of the Bankruptcy Code (collectively, the "***Excluded Administrative Claims***").

On [●], at [●] p.m. (Prevailing Central Time) (the "***Contract Rejection Claims Bar Date***" and together with the Administrative Claims Bar Date, the "***Applicable Bar Date***") was established by the Court as the deadline by which Holders of Claims arising from rejection of Executory Contracts or Unexpired Leases must file proofs of claim against the Debtors (the "***Contract Rejection Claims***"). The proof of claim form is available free of charge on the Restructuring Website. A separate rejection notice will be sent to all known non-Debtor contract counterparties to such rejected contracts and leases with a proof of claim form (the "***Proof of Contract Rejection Claim Form***" and together with the Proof of Administrative Claim Form, the "***Applicable Forms***"). Contract Rejection Claims will be treated as Class 4 General Unsecured Claims.

All Holders of Administrative Claims (other than Excluded Administrative Claims) and Contract Rejection Claims must submit (by overnight mail, courier service, hand delivery, regular mail or in person) an original, written Proof of Administrative Claim Form or Proof of Contract Rejection Claim Form, as applicable, so as to be **actually received** by the Claims and Noticing Agent, by no later than [●] p.m. (Prevailing Central Time) on or before [●], via electronic submission on the following webpage of the Restructuring Website: https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare, or, alternatively, at the following address:

ModivCare Inc.
c/o Verita Ballot Processing Center
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

The Applicable Forms will be deemed timely filed only if **actually received** by the Claims and Noticing Agent on or before the Applicable Bar Date. The Applicable Forms may **not** be delivered by facsimile, telecopy, or e-mail transmission. Any facsimile, telecopy, or electronic mail submissions will **not** be accepted and will **not** be deemed filed until the Applicable Form is submitted to the Claims and Noticing Agent by overnight mail, courier service, hand delivery, regular mail, in person or electronically through the Claims and Noticing Agent's website.

Parties wishing to receive acknowledgment that their Applicable Forms were received by the Claims and Noticing Agent must submit (i) a copy of the Applicable Form and (ii) a self-addressed, stamped envelope (in addition to the original Applicable Form sent to the Claims and Noticing Agent).

To be valid, your Applicable Form **MUST** be (i) signed by the applicable Holder of the Administrative Claim or Contract Rejection Claim, as applicable; (ii) written in the English language; (iii) denominated in lawful currency of the United States; and (iv) submitted with copies of any supporting documentation or an explanation of why any such documentation is not available.

Any Holder of an Administrative Claim or Contract Rejection Claim, as applicable, who is required, but fails, to file the Applicable Form with the Claims and Noticing Agent on or before the Applicable Bar Date shall be forever barred, estopped and enjoined from asserting such claim against the Debtors or the Reorganized Debtors, and the Debtors' and the Reorganized Debtors' property shall be forever discharged from any and all indebtedness or liability with respect to such claim.

The Plan and the Confirmation Order may be viewed for free on the Restructuring Website, or for a fee on the Court's website at http://www.txs.uscourts.gov/page/bankruptcy-court.

Dated: [●]
Houston, Texas

Respectfully submitted,

/s/

HUNTON ANDREWS KURTH LLP
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Attorneys for the Reorganized Debtors

COMPLX, LEAD, COMPLX, APPEAL, APPEAL_NAT

U.S. Bankruptcy Court
Southern District of Texas (Houston)
Bankruptcy Petition #: 25-90309

Date filed: 08/20/2025
Plan confirmed: 12/15/2025

Assigned to: Bankruptcy Judge Alfredo R Perez
Chapter 11
Voluntary
Asset

Debtor
ModivCare Inc.
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO

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Debtor
A & B Homecare Solutions, L.L.C.
70 East Sunrise Highway
Suite 520
Valley Stream, NY 11581
NASSAU-NY
Tax ID / EIN: 06-1565019

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
A.E. Medical Alert, Inc.
3000 Town Center
Suite 2555
Southfield, MI 48075
OAKLAND-MI
7132204200
Tax ID / EIN: 56-2348300

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
ABC Homecare LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 47-5312537

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Debtor
All Metro Aids Inc.
70 East Sunrise Highway
Suite 520
Valley Stream, NY 11581
NASSAU-NY
Tax ID / EIN: 11-2542379

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(See above for address)

Debtor
All Metro Associate Payroll Services Corporation
70 East Sunrise Highway
Suite 520
Valley Stream, NY 11581
NASSAU-NY
Tax ID / EIN: 13-4312222

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
All Metro CGA Payroll Services Corporation
70 East Sunrise Highway

represented by **Timothy Alvin Davidson, II**
(See above for address)

Suite 520
Valley Stream, NY 11581
NASSAU-NY
Tax ID / EIN: 47-3753810

Debtor
All Metro Field Service Workers Payroll Services Corporation
70 East Sunrise Highway
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Valley Stream, NY 11581
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Tax ID / EIN: 13-4312220

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Debtor
All Metro Health Care Services, Inc.
70 East Sunrise Highway
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Valley Stream, ny 11581
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Tax ID / EIN: 84-1623916

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Debtor
All Metro Home Care Services of Florida, Inc.
70 East Sunrise Highway
Suite 520
Valley Stream, NY 11581
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Tax ID / EIN: 43-2015287

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
All Metro Home Care Services of New Jersey, Inc.
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Valley Stream, NY 11581
NASSAU-NY
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(See above for address)

Debtor
All Metro Home Care Services of New York, Inc.
70 East Sunrise Highway
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NASSAU-NY
Tax ID / EIN: 84-1623899

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Catherine Allyn Rankin
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Debtor
All Metro Home Care Services, Inc.
70 East Sunrise Highway
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NASSAU-NY

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Tax ID / EIN: 84-1623924

Debtor
All Metro Management and Payroll Services Corporation
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Tax ID / EIN: 83-0439830

represented by **Timothy Alvin Davidson, II**
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Debtor
All Metro Payroll Services Corporation
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Valley Stream, NY 11581
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Tax ID / EIN: 11-3353755

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Debtor
AM Holdco, Inc.
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Tax ID / EIN: 37-1744530

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AM Intermediate Holdco, Inc.
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Debtor
Arsens Home Care, Inc.
261 Old York Road
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Jenkintown, PA 19046
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Tax ID / EIN: 20-2862290

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ARU Hospice Inc.
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Denver, CO 80237
DENVER-CO
Tax ID / EIN: 45-5092171

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Associated Home Services, Inc.
3000 Town Center
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Tax ID / EIN: 74-2722067

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At-Home Quality Care, LLC
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BELKNAP-NH
Tax ID / EIN: 26-1552093

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Southfield, MI 48075
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Tax ID / EIN: 02-0442987

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Debtor
Barney's Medical Alert-ERS, Inc.
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Southfield, MI 48075
OAKLAND-MI
Tax ID / EIN: 27-1724008

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Debtor
California MedTrans Network IPA LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 61-1732160

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Catherine Allyn Rankin
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Debtor
California MedTrans Network MSO LLC
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Denver, CO 80237
DENVER-CO
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Catherine Allyn Rankin
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Debtor
Care Finders Total Care LLC

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10 Banta Place
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BERGEN-NJ
Tax ID / EIN: 46-2555599

Debtor
CareGivers Alliance, LLC
6900 E. Layton Avenue
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Denver, CO 80237
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Tax ID / EIN: 45-5022161

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Debtor
CareGivers America Home Health Services, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
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Tax ID / EIN: 20-8167059

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Debtor
CareGivers America Medical Staffing, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
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Tax ID / EIN: 26-3978350

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Debtor
CareGivers America Medical Supply, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 58-3787187

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Debtor
CareGivers America Registry, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 27-1302162

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Debtor
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Jenkintown, PA 19046
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Tax ID / EIN: 33-0993363

Debtor
Caregivers On Call, Inc.
6900 E. Layton Avenue
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Denver, CO 80237
DENVER-CO
Tax ID / EIN: 16-1737635

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CGA Holdco, Inc.
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Valley Stream, NY 11581
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Tax ID / EIN: 47-1880444

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Debtor
CGA Staffing Services, LLC
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Denver, CO 80237
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Tax ID / EIN: 37-1616908

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Circulation, Inc.
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Florida MedTrans Network LLC
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DENVER-CO
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Florida MedTrans Network MSO LLC
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Denver, CO 80237
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Tax ID / EIN: 36-4778512

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OAKLAND-MI
Tax ID / EIN: 38-3432082

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Health Trans, Inc.
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Valley Stream, NY 11581
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Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 27-1752958

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Higi Care Holdings, LLC
100 South Wacker Drive

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(See above for address)

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Chicago, IL 60606
COOK-IL

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COOK-IL
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DENVER-CO
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Metropolitan Medical Transportation IPA, LLC
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Debtor
MLA Sales, LLC
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Timothy Alvin Davidson, II

Southfield, MI 48075
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Catherine Allyn Rankin
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Debtor
ModivCare Solutions, LLC
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Denver, CO 80237
DENVER-CO
Tax ID / EIN: 58-2491253

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Catherine Allyn Rankin
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Lawrence, MA 01843
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Denver, CO 80237
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Tax ID / EIN: 47-2336925

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Timothy Alvin Davidson, II
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Catherine Allyn Rankin
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Debtor
New England Emergency Response Systems, Inc.
3000 Town Center
Suite 2555
Southfield, MI 48075
OAKLAND-MI
SSN / ITIN: xxx-xx-2833

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Debtor
OEP AM, Inc.
70 East Sunrise Highway
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Valley Stream, NY 11581
NASSAU-NY
Tax ID / EIN: 81-1260939

represented by **Brandon Bell**
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Catherine Allyn Rankin
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Debtor
Panhandle Support Services, Inc.
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237

represented by **Timothy Alvin Davidson, II**
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DENVER-CO
Tax ID / EIN: 55-0728651

Debtor
Personal In-Home Services, Inc.
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 20-5107362

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Debtor
Philadelphia Home Care Agency, Inc.
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Hackensack, NJ 07601
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Provado Technologies, LLC
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Denver, CO 80237
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Tax ID / EIN: 22-3895026

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Catherine Allyn Rankin
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Debtor
Red Top Transportation, Inc.
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Tax ID / EIN: 59-2499262

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Catherine Allyn Rankin
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Debtor
Ride Plus, LLC
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Denver, CO 80237
DENVER-CO
Tax ID / EIN: 27-2769684

represented by **Timothy Alvin Davidson, II**
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Debtor
Safe Living Technologies, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 32-0413522

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
Secura Home Health Holdings, Inc.
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 47-2928880

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
Secura Home Health, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 47-2908342

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
Socrates Health Holdings, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 85-4229682

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
TriMed, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 47-5088596

represented by **Brandon Bell**
(See above for address)

Timothy Alvin Davidson, II
(See above for address)

Catherine Allyn Rankin
(See above for address)

Debtor
Union Home Care LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 82-3229500

represented by **Timothy Alvin Davidson, II**
(See above for address)

Debtor
Valued Relationships, Inc.
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 31-1274364

represented by **Brandon Bell**
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Timothy Alvin Davidson, II
(See above for address)

Catherine Allyn Rankin
(See above for address)

Debtor
Victory Health Holdings, LLC
6900 E. Layton Avenue

represented by **Brandon Bell**
(See above for address)

Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 87-2147451

Timothy Alvin Davidson, II
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Catherine Allyn Rankin
(See above for address)

Debtor
VRI Intermediate Holdings, LLC
6900 E. Layton Avenue
Suite 1100 & 1200
Denver, CO 80237
DENVER-CO
Tax ID / EIN: 46-4570913

represented by **Timothy Alvin Davidson, II**
(See above for address)

U.S. Trustee
US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002

represented by **Jana Smith Whitworth**
Office of United States Trustee
515 Rusk Street, Suite 3516
Houston, TX 77002
(713) 718-4650
Fax : (713) 718-4670
Email: jana.whitworth@usdoj.gov

Creditor Committee
Official Committee Of Unsecured Creditors

represented by **Ashley Chase**
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Email: azatz@whitecase.com

Filing Date	#	Docket Text
08/20/2025	1 (40 pgs)	Chapter 11 Voluntary Petition Non-Individual Fee Amount $1738 Filed by ModivCare Inc.. (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	2 (5 pgs; 2 docs)	Designation of Complex Chapter 11 Bankruptcy Case (Filed By ModivCare Inc.). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	3 (21 pgs; 4 docs)	Ex Parte Emergency Motion | *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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Exhibit A (Verita Engagement Letter) # 2 Exhibit B (Gershbein Declaration) # 3 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	4 (271 pgs; 3 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order (Exhibit A) # 2 Exhibit B (Form of Backstop Commitment Letter)) (Davidson, Timothy) (Entered: 08/20/2025)

08/20/2025	5 (56 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	6 (40 pgs; 3 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order (Interim Order) # 2 Proposed Order (Final Order)) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	7 (43 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	8 (35 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	9 (38 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	10 (3 pgs)	Notice of Appearance and Request for Notice Filed by Matthew L Warren Filed by on behalf of First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 08/20/2025)
08/20/2025	11 (1 pg)	MOTION to Appear Pro Hac Vice for Kristopher M. Hansen (Fee Paid: $100, receipt number A26416360) Filed by Creditor First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 08/20/2025)
08/20/2025	12 (20 pgs)	Declaration re: *Declaration of Zul Jamal in Support of the Debtors' Motion to Obtain Postpetition Debtor-In-Possession Financing* (Filed By ModivCare Inc.).(Related document(s):4 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/20/2025)

08/20/2025	13 (1 pg)	MOTION to Appear Pro Hac Vice for Lindsey Henrikson (Fee Paid: $100, receipt number A26416365) Filed by Creditor First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 08/20/2025)
08/20/2025	14 (225 pgs)	Declaration re: *Declaration of Chad J. Shandler in Support of Debtors' Chapter 11 Petitions and First Day Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	15 (65 pgs; 2 docs)	Emergency Motion *of Debtors For Entry of An Order (A) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees, and (B) Granting Related Relief* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	16 (64 pgs; 5 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Exhibit A (Cash Management Schematic) # 2 Exhibit B (Bank Account List) # 3 Proposed Order (Interim Order) # 4 Proposed Order (Final Order)) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	17 (27 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025	18 (13 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/20/2025)
08/20/2025		Receipt of Voluntary Petition (Chapter 11)(25-90309) [misc,volp11] (1738.00) Filing Fee. Receipt number A26416845. Fee amount $1738.00. (U.S. Treasury) (Entered: 08/20/2025)
08/21/2025	19 (51 pgs; 2 docs)	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* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	20 (28 pgs; 2 docs)	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 Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	21 (45 pgs; 2 docs)	Emergency Motion *of Debtors for an Order Directing Joint Administration of Chapter 11 Cases* Filed by Debtor ModivCare Inc. Hearing scheduled for 8/21/2025 at 02:30 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	22 (2225 pgs; 23 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 (First Day Declaration) # 2 Exhibit 2 (DIP Declaration) # 3 Exhibit 3 (DIP Credit Agreement) # 4 Exhibit 4 (Chapter 11 Milestones) # 5 Exhibit 5 (Initial DIP Budget) # 6 Exhibit 6 (DIP Lien/Claim Priorities) # 7 Exhibit 7 (Form of Backstop Commitment Letter) # 8 Exhibit 8 (RSA) # 9 Exhibit 9 (Corporate Structure Chart) # 10 Exhibit 10 (Cash Management Schematic) # 11 Exhibit 11 (Bank Account Listing) # 12 Exhibit 12 (Utility Service List) # 13 Exhibit 13 (Insurance Policies) # 14 Exhibit 14 (Letters of Credit) # 15 Exhibit 15 (Surety Bonds) # 16 Exhibit 16 (Taxing and Regulatory Authorities) # 17 Exhibit 17 (NOL Procedures) # 18 Exhibit 18 (1L Credit Agreement) # 19 Exhibit 19 (2L Notes Indenture) # 20 Exhibit 20 (Intercreditor Agreement) # 21 Exhibit 21 (Senior Notes Indenture) # 22 Exhibit 22 (Subordination Agreement)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	23 (5 pgs)	Notice *of Emergency Virtual Hearing on First Day Motions*. (Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 3 Emergency Motion (with hearing date), 4 Emergency Motion (with hearing date), 5 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 7 Emergency Motion (with hearing date), 8 Emergency Motion (with hearing date), 9 Emergency Motion (with hearing date), 12 Declaration, 14 Declaration, 15 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 17 Emergency Motion (with hearing date), 18 Emergency Motion (with hearing date), 19 Emergency Motion (with hearing date), 20 Emergency Motion (with hearing date), 21 Emergency Motion (with hearing date), 22 Witness List, Exhibit List) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	24 (1 pg)	MOTION to Appear Pro Hac Vice for Montana Licari (Fee Paid: $100, receipt number A26416911) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025	25 (1 pg)	MOTION to Appear Pro Hac Vice for Nikhil A. Gulati (Fee Paid: $100, receipt number A26416912) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025	26 (1 pg)	MOTION to Appear Pro Hac Vice for Brian Isaac Herskowitz (Fee Paid: $100, receipt number A26416913) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025		Notice of Appearance and Request for Notice Filed by Jana Smith Whitworth (Whitworth, Jana) (Entered: 08/21/2025)

08/21/2025	27 (20 pgs)	Order for Joint Administration Signed on 8/21/2025 (Related Doc # 21). (tjl4) (Entered: 08/21/2025)
08/21/2025	28 (2 pgs)	Order Granting Complex Case Treatment, Signed on 8/21/2025 (Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case) (tjl4) (Entered: 08/21/2025)
08/21/2025	29 (5 pgs)	Agenda for Hearing on 8/21/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	30 (3 pgs)	Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC DBA Verita Global as Claims, Noticing, and Solicitation Agent (Related Doc # 3) Signed on 8/21/2025. (tjl4) (Entered: 08/21/2025)
08/21/2025	31 (1 pg)	MOTION to Appear Pro Hac Vice for Elizabeth Marks (Fee Paid: $100, receipt number A26418438) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 08/21/2025)
08/21/2025	32 (1 pg)	Order Granting Motion for Kristopher M. Hansen To Appear pro hac vice (Related Doc # 11) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	33 (1 pg)	Order Granting Motion for Lindsey Henrikson To Appear pro hac vice (Related Doc # 13) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	34 (1 pg)	Order Granting Motion for Montana Licari To Appear pro hac vice (Related Doc # 24) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	35 (1 pg)	Order Granting Motion for Nikhil A. Gulati To Appear pro hac vice (Related Doc # 25) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	36 (1 pg)	Order Granting Motion for Brian Isaac Herskowitz To Appear pro hac vice (Related Doc # 26) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	37 (1 pg)	Order Granting Motion for Elizabeth Marks To Appear pro hac vice (Related Doc # 31) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	38 (1 pg)	MOTION to Appear Pro Hac Vice for Emma Fleming (Fee Paid: $100, receipt number A26419055) Filed by Creditor Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)

08/21/2025	39 (1 pg)	MOTION to Appear Pro Hac Vice for Jonathan I. Levine (Fee Paid: $100, receipt number A26419079) Filed by Creditor Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)
08/21/2025	40 (1 pg)	MOTION to Appear Pro Hac Vice for Tom H. Good (Fee Paid: $100, receipt number A26419091) Filed by Creditor Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)
08/21/2025	41 (20 pgs; 2 docs)	Notice *of Filing of Debtors' Demonstrative for Hearing on August 21, 2025*. Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - First Day Demonstrative) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	42 (2234 pgs; 24 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):22 Witness List, Exhibit List) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18 # 19 Exhibit 19 # 20 Exhibit 20 # 21 Exhibit 21 # 22 Exhibit 22 # 23 Exhibit 23) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	43 (5 pgs)	Notice of Appearance and Request for Notice Filed by Emma Fleming Filed by on behalf of Wilmington Savings Fund Society, FSB (Fleming, Emma) (Entered: 08/21/2025)
08/21/2025	44 (33 pgs)	Certificate *of Service re First Day Hearing & Motions* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 4 Emergency Motion (with hearing date), 5 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 7 Emergency Motion (with hearing date), 8 Emergency Motion (with hearing date), 9 Emergency Motion (with hearing date), 12 Declaration, 14 Declaration, 15 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 17 Emergency Motion (with hearing date), 18 Emergency Motion (with hearing date), 19 Emergency Motion (with hearing date), 20 Emergency Motion (with hearing date), 22 Witness List, Exhibit List, 23 Notice, 27 Order for Joint Administration, 28 Initial Order Complex Chapter 11, 29 Agenda, 30 Order on Emergency Motion) (Gershbein, Evan) (Entered: 08/21/2025)
08/21/2025	45 (10 pgs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):16 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	46 (2 pgs)	Notice of Appearance and Request for Notice Filed by Julie Anne Parsons Filed by on behalf of Central Appraisal District of Taylor County, Reeves County Tax District, The County of Hays, Texas, County of Erath, The County of Denton, Texas, The County of Comal, Texas, Burnet Central Appraisal District, The County of Brazos, Texas (Parsons, Julie) (Entered: 08/21/2025)

08/21/2025	47 (7 pgs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):6 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	48 (84 pgs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):4 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	49 (1 pg)	Order Granting Motion for Emma Fleming To Appear pro hac vice (Related Doc # 38) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	50 (1 pg)	Order Granting Motion for Jonathan I. Levine To Appear pro hac vice (Related Doc # 39) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	51 (1 pg)	Order Granting Motion for Thomas H. Good To Appear pro hac vice (Related Doc # 40) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	52 (84 pgs)	Interim 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, Signed on 8/21/2025 (Related document(s):4 Emergency Motion (with hearing date)) **Hearing scheduled for 9/16/2025 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 08/21/2025)
08/21/2025	53 (12 pgs)	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 (Related Doc # 20), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	54 (3 pgs)	Order (A) Extending the Time to File Schedules and Statements and 2015.3 Reports; (B) Modifying the Requirement of Bankruptcy Local Rule 2015-3; and (C) Granting Related Relief (Related Doc # 18), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	55 (38 pgs)	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 (Related Doc # 5), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	56 (15 pgs)	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 (Related Doc # 8), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	57 (14 pgs)	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 (Related Doc # 7), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	58 (41 pgs)	Order (A) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees and (B) Granting Related Relief (Related Doc # 15), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	59 (10 pgs)	Interim 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, Signed on 8/21/2025 (Related document(s):16 Emergency Motion (with hearing date)) **Hearing scheduled for 9/16/2025 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 08/21/2025)
08/21/2025	60 (4 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 08/21/2025)
08/21/2025	61 (5 pgs)	Order (A) Authorizing Debtors to (I) Honor Their Prepetition Obligations to Customers, and (II) Continue Their Customer Programs; and (B) Granting Related Relief (Related Doc # 17), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	62 (56 pgs; 2 docs)	Proposed Order Submission After Hearing (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A (Redline)) (Davidson, Timothy) (Entered: 08/21/2025)
08/21/2025	63 (4 pgs)	Certificate *of Service* (Filed By US Trustee). (Whitworth, Jana) (Entered: 08/21/2025)
08/21/2025	64 (7 pgs)	Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief, Signed on 8/21/2025 (Related document(s):6 Emergency Motion (with hearing date)) **Hearing scheduled for 9/16/2025 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 08/21/2025)
08/21/2025	65 (6 pgs)	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 (Related Doc # 9), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)

08/21/2025	66 (29 pgs)	Order Establishing (A) Bar Dates and Related Producers for Filing Proofs of Claim, (B) Approving the Form and Manner of Notice Thereof, and (C) Granting Related Relief (Related Doc # 19), Signed on 8/21/2025. (abh4) (Entered: 08/21/2025)
08/21/2025	67 (1 pg)	Courtroom Minutes. Time Hearing Held: 2:30 PM to 4:11 PM. Appearances: see log. Additional appearances: Matthew Dundon. Admitted Exhibits: ECF Nos.42-1, 42-23, 42-2 are admitted as direct testimony; 42-3 through 42-22. Complex Ch.11 first day hearing held. Oral argument heard on the record. Final orders have been signed and entered for motions 5, 7, 8, 9, 15, 17, 18, 19, and 20. The debtor is to submit a revised order for motion 19. Interim orders have been signed and entered for motions 4, 6, 16. The second day hearings are set for 9/16/2025 at 9:00 AM CST to be held by video conference. The objection deadline is 9/10/2025 at 5:00 PM CST.ERO: yes. (Related document(s):4 Emergency Motion (with hearing date), 5 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 7 Emergency Motion (with hearing date), 8 Emergency Motion (with hearing date), 9 Emergency Motion (with hearing date), 15 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 17 Emergency Motion (with hearing date), 18 Emergency Motion (with hearing date), 19 Emergency Motion (with hearing date), 20Emergency Motion (with hearing date)) (abh4) (Entered: 08/21/2025)
08/21/2025	68 (1 pg)	PDF with attached Audio File. Court Date & Time [8/21/2025 2:30:12 PM]. File Size [47922 KB]. Run Time [01:39:50]. (admin). (Entered: 08/21/2025)
08/21/2025	69 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the First Day Hearing held on August 21, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Trinity Transcription Services (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Trinity Transcription Services on 8/22/2025. Estimated completion date: 8/23/2025. Modified on 8/22/2025 (smg4). (Entered: 08/21/2025)
08/22/2025	70 (2 pgs)	Notice of Appearance and Request for Notice Filed by Gary David Bressler Filed by on behalf of Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties (Bressler, Gary) (Entered: 08/22/2025)
08/22/2025	71 (1 pg)	MOTION to Appear Pro Hac Vice for Virginia T. Shea, Esq. (Fee Paid: $100, receipt number A26422505) Filed by Creditor Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties (Bressler, Gary) (Main Document 71 replaced on 8/28/2025) (AkeitaHouse). (Entered: 08/22/2025)
08/22/2025	72 (3 pgs)	Notice of Appearance and Request for Notice Filed by Mollie Margaret Lerew Filed by on behalf of Wichita County (Lerew, Mollie) (Entered: 08/22/2025)
08/22/2025	73 (1 pg)	Notice of Appearance and Request for Notice Filed by John Kendrick Turner Filed by on behalf of Tarrant County, Dallas County (Turner, John) (Entered: 08/22/2025)

08/22/2025	74 (22 pgs)	Certificate *of Service re: 1) Debtors Amended Witness and Exhibit List; 2) [Proposed] Interim 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; 3) [Proposed] Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief; and 4) [Proposed] Interim 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):42 Witness List, Exhibit List, 45 Proposed Order, 47 Proposed Order, 48 Proposed Order) (Gershbein, Evan) (Entered: 08/22/2025)
08/23/2025	75 (22 pgs)	BNC Certificate of Mailing. (Related document(s):27 Order for Joint Administration) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	76 (6 pgs)	BNC Certificate of Mailing. (Related document(s):28 Initial Order Complex Chapter 11) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	77 (7 pgs)	BNC Certificate of Mailing. (Related document(s):30 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	78 (5 pgs)	BNC Certificate of Mailing. (Related document(s):32 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	79 (5 pgs)	BNC Certificate of Mailing. (Related document(s):33 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	80 (5 pgs)	BNC Certificate of Mailing. (Related document(s):34 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	81 (5 pgs)	BNC Certificate of Mailing. (Related document(s):35 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	82 (5 pgs)	BNC Certificate of Mailing. (Related document(s):36 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	83 (5 pgs)	BNC Certificate of Mailing. (Related document(s):37 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	84 (6 pgs)	BNC Certificate of Mailing. (Related document(s):49 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)

08/23/2025	85 (6 pgs)	BNC Certificate of Mailing. (Related document(s):50 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	86 (6 pgs)	BNC Certificate of Mailing. (Related document(s):51 Order on Motion to Appear pro hac vice) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	87 (89 pgs)	BNC Certificate of Mailing. (Related document(s):52 Order Setting Hearing) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	88 (17 pgs)	BNC Certificate of Mailing. (Related document(s):53 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	89 (8 pgs)	BNC Certificate of Mailing. (Related document(s):54 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	90 (43 pgs)	BNC Certificate of Mailing. (Related document(s):55 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	91 (20 pgs)	BNC Certificate of Mailing. (Related document(s):56 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	92 (19 pgs)	BNC Certificate of Mailing. (Related document(s):57 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	93 (46 pgs)	BNC Certificate of Mailing. (Related document(s):58 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	94 (15 pgs)	BNC Certificate of Mailing. (Related document(s):59 Order Setting Hearing) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	95 (10 pgs)	BNC Certificate of Mailing. (Related document(s):61 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	96 (12 pgs)	BNC Certificate of Mailing. (Related document(s):64 Order Setting Hearing) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	97 (11 pgs)	BNC Certificate of Mailing. (Related document(s):65 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)
08/23/2025	98 (34 pgs)	BNC Certificate of Mailing. (Related document(s):66 Order on Emergency Motion) No. of Notices: 1. Notice Date 08/23/2025. (Admin.) (Entered: 08/23/2025)

08/25/2025	99 (1 pg)	Notice of Appearance and Request for Notice Filed by Tara L Grundemeier Filed by on behalf of Galveston County, Houston Community College System, Fort Bend County, Texas City ISD, Lone Star College System, Cypress-Fairbanks ISD, Jefferson County, Montgomery County, Katy ISD (Grundemeier, Tara) (Entered: 08/25/2025)
08/25/2025	100 (2 pgs)	Notice of Appearance and Request for Notice Filed by Jeffrey Kurtzman Filed by on behalf of Keystone Quality Transport (Kurtzman, Jeffrey) (Entered: 08/25/2025)
08/25/2025	101 (1 pg)	Notice of Appearance and Request for Notice Filed by Don Stecker Filed by on behalf of Bexar County, City Of El Paso (Stecker, Don) (Entered: 08/25/2025)
08/26/2025	102 (311 pgs; 4 docs)	Notice *of Filing of Amended Interim DIP Order*. (Related document(s):4 Emergency Motion (with hearing date), 52 Order Setting Hearing) Filed by ModivCare Inc. (Attachments: # 1 Proposed Order (Ex. A) # 2 Exhibit B (Redline) # 3 Exhibit C (Changed-Page Only Redline)) (Davidson, Timothy) (Entered: 08/26/2025)
08/26/2025	103 (1 pg)	MOTION to Appear Pro Hac Vice for John A. Moe, II (Fee Paid: $100, receipt number A26431549) Filed by Creditor VXI Global Solutions, Inc. (Doherty, Casey) (Entered: 08/26/2025)
08/27/2025	104 (1 pg)	Order Granting Motion for John A. Moe, II To Appear pro hac vice (Related Doc # 103) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/27/2025. (abh4) (Entered: 08/27/2025)
08/27/2025	105 (1 pg)	Notice of Appearance and Request for Notice Filed by Tara L Grundemeier Filed by on behalf of Harris County ESD #09, Houston ISD, City of Houston, Harris County ESD #07, Harris County ESD #11, Harris County ESD #16 (Grundemeier, Tara) (Entered: 08/27/2025)
08/27/2025	106 (214 pgs)	Interim 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, Signed on 8/27/2025 (Related document(s):4 Emergency Motion (with hearing date), 102 Notice) (abh4) (Entered: 08/27/2025)
08/27/2025	107 (4 pgs)	Notice of Appearance and Request for Notice Filed by John A. Moe II Filed by on behalf of VXI Global Solutions, Inc. (Moe, John) (Entered: 08/27/2025)
08/28/2025	108 (1 pg)	Order Granting Motion for Virginia Shea To Appear pro hac vice (Related Doc # 71) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 8/28/2025. (abh4) (Entered: 08/28/2025)
08/28/2025	109 (2 pgs)	Notice of Appearance and Request for Notice Filed by Alysia Cordova Filed by on behalf of Taxing Districts Collected by Randall County, Taxing Districts Collected by Potter County, Childress County Appraisal

		District, Gray County Tax Office, Hale County Appraisal District, Hutchinson Count (Cordova, Alysia) (Entered: 08/28/2025)
08/28/2025	110 (4 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 08/28/2025)
08/29/2025	111 (3 pgs)	Notice of Appearance and Request for Notice Filed by Scott C Williams Filed by on behalf of Siriuspoint America Insurance Company (Williams, Scott) (Entered: 08/29/2025)
08/29/2025	112 (3 pgs)	Notice of Appearance and Request for Notice Filed by Scott C Williams Filed by on behalf of Atlantic Specialty Insurance Company (Williams, Scott) (Entered: 08/29/2025)
09/01/2025	113 (58 pgs)	Certificate *of Service re First Day Motions and Orders* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 12 Declaration, 14 Declaration, 16 Emergency Motion (with hearing date), 27 Order for Joint Administration, 28 Initial Order Complex Chapter 11, 30 Order on Emergency Motion, 52 Order Setting Hearing, 53 Order on Emergency Motion, 54 Order on Emergency Motion, 55 Order on Emergency Motion, 56 Order on Emergency Motion, 57 Order on Emergency Motion, 58 Order on Emergency Motion, 59 Order Setting Hearing, 61 Order on Emergency Motion, 64 Order Setting Hearing, 65 Order on Emergency Motion, 66 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/01/2025)
09/02/2025	114 (3 pgs)	Notice of Appearance and Request for Notice Filed by Brian John Wagner Filed by on behalf of Virginia Department of Medical Assistance Services (Wagner, Brian) (Entered: 09/02/2025)
09/02/2025	117 (2 pgs)	Notice of Appearance and Request for Notice Filed by Linda D Reece Filed by on behalf of Frisco ISD, Plano ISD (anc4) (Entered: 09/04/2025)
09/03/2025	115 (1 pg)	Notice of Appearance and Request for Notice Filed by Don Stecker Filed by on behalf of Ector CAD (Stecker, Don) (Entered: 09/03/2025)
09/03/2025	116 (1 pg)	Notice of Appearance and Request for Notice Filed by John Kendrick Turner Filed by on behalf of City of Frisco, Gregg County, Tom Green CAD, Navarro County, City of Allen, Grayson County, Smith County, Stephenville ISD, Lewisville ISD, Allen ISD, Ellis County, City of Stephenville, Parker CAD (Turner, John) (Entered: 09/03/2025)
09/04/2025	118 (5 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 09/04/2025)
09/04/2025	119 (64 pgs)	Chapter 11 Plan of Reorganization Filed by ModivCare Inc.. (Davidson, Timothy) (Entered: 09/04/2025)
09/04/2025	120 (175 pgs)	Disclosure Statement Filed by ModivCare Inc.. (Davidson, Timothy) (Entered: 09/04/2025)
09/04/2025	121 (78 pgs; 2 docs)	Transcript RE: FIRST DAY MOTIONS HEARING held on August 21, 2025 before Judge Alfredo Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with

		privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 12/3/2025. (Battaglia, Cheryl) (Entered: 09/04/2025)
09/04/2025	122 (290 pgs; 2 docs)	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 Forms 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* Filed by Debtor ModivCare Inc. Hearing scheduled for 10/6/2025 at 09:00 AM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/04/2025)
09/05/2025	123 (1 pg)	MOTION to Appear Pro Hac Vice for Sally B. Fox (Fee Paid: $100, receipt number A26458625) Filed by Attorney Sally B Fox (Fox, Sally) (Entered: 09/05/2025)
09/05/2025	124 (3 pgs)	Notice of Appointment of Creditors' Committee (Whitworth, Jana) (Entered: 09/05/2025)
09/05/2025	125 (2 pgs)	US Trustee's Notice *of Electronic Organizational Meeting of the Official Committee of Unsecured Creditors, to be held on Saturday, September 6, 2025, at 10:00 a.m. (CST)*. (Whitworth, Jana) (Entered: 09/05/2025)
09/05/2025	126 (27 pgs)	Certificate *of Service re: Notice of 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):55 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/05/2025)
09/05/2025	127 (14 pgs)	Certificate *of Service re: Interim 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):106 Generic Order) (Gershbein, Evan) (Entered: 09/05/2025)
09/05/2025	128 (269 pgs)	Certificate *of Service re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):64 Order Setting Hearing) (Gershbein, Evan) (Entered: 09/05/2025)
09/05/2025	138 (2 pgs)	Notice of Appearance and Request for Notice Filed by William G. Wright Filed by on behalf of Tricare at Inspira, LLC (pns4) (Entered: 09/09/2025)
09/07/2025	129 (10 pgs)	BNC Certificate of Mailing. (Related document(s):121 Transcript) No. of Notices: 3. Notice Date 09/07/2025. (Admin.) (Entered: 09/07/2025)

09/08/2025	130 (1 pg)	Order Granting Motion for Sally B. Fox To Appear pro hac vice (Related Doc # 123) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/8/2025. (abh4) (Entered: 09/08/2025)
09/08/2025	131 (2 pgs)	Notice of Appearance and Request for Notice Filed by Hiram A Gutierrez Filed by on behalf of Brownsville Independent School District (Gutierrez, Hiram) (Entered: 09/08/2025)
09/08/2025	132 (1 pg)	MOTION to Appear Pro Hac Vice for Catherine Steege (Fee Paid: $100, receipt number A26463349) Filed by Debtor Uber Health, LLC (Steege, Catherine) (Entered: 09/08/2025)
09/08/2025	133 (4 pgs)	Notice of Appearance and Request for Notice Filed by Catherine L Steege Filed by on behalf of Uber Health, LLC (Steege, Catherine) (Entered: 09/08/2025)
09/09/2025	134 (2 pgs)	Notice of Appearance and Request for Notice Filed by Melissa E Valdez Filed by on behalf of PASADENA INDEPENDENT SCHOOL DISTRICT et al. (Valdez, Melissa) (Entered: 09/09/2025)
09/09/2025	135 (1 pg)	Order Granting Motion for Catherine Steege To Appear pro hac vice (Related Doc # 132) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/9/2025. (abh4) (Entered: 09/09/2025)
09/09/2025	136 (1 pg)	MOTION to Appear Pro Hac Vice for Melissa M. Root (Fee Paid: $100, receipt number A26465675) Filed by Debtor Uber Health, LLC (Root, Melissa) (Entered: 09/09/2025)
09/09/2025	137 (1 pg)	MOTION to Appear Pro Hac Vice for Stephenie Biernacki Anthony (Fee Paid: $100, receipt number A26467235) Filed by Creditor Deborah Slaughter (Anthony, Stephenie) (Entered: 09/09/2025)
09/09/2025	139 (1 pg)	MOTION to Appear Pro Hac Vice for Annie Y. Stoops (Fee Paid: $100, receipt number A26467410) Filed by Creditor Genesys Cloud Services Inc (Stoops, Annie) (Entered: 09/09/2025)
09/09/2025	140 (1 pg)	MOTION to Appear Pro Hac Vice for Shannon W. Rieger (Fee Paid: $100, receipt number A26467510) Filed by Creditor Genesys Cloud Services Inc (Rieger, Shannon) (Entered: 09/09/2025)
09/09/2025	141 (3 pgs)	Affidavit Re: *Publication of the Notice of Chapter 11 Bankruptcy Case in The New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/09/2025)
09/09/2025	142 (3 pgs)	Affidavit Re: *Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in The New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):66 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/09/2025)
09/09/2025	143 (3 pgs)	Affidavit Re: *Publication of the Notice of the 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 in The New York Times (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):55 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/09/2025)
09/10/2025	144 (1 pg)	Order Granting Motion for Melissa M. Root To Appear pro hac vice (Related Doc # 136) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	145 (1 pg)	Order Granting Motion for Stephenie Biernacki Anthony To Appear pro hac vice (Related Doc # 137) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	146 (1 pg)	Order Granting Motion for Annie Y. Stoops To Appear pro hac vice (Related Doc # 139) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	147 (1 pg)	Order Granting Motion for Shannon W. Rieger To Appear pro hac vice (Related Doc # 140) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/10/2025. (abh4) (Entered: 09/10/2025)
09/10/2025	148 (4 pgs)	Notice of Appearance and Request for Notice Filed by Charles R. Koster Filed by on behalf of Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 09/10/2025)
09/11/2025	149 (1 pg)	MOTION to Appear Pro Hac Vice for J. Christopher Shore (Fee Paid: $100, receipt number A26471777) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Shore, Christopher) (Entered: 09/11/2025)
09/11/2025	150 (1 pg)	MOTION to Appear Pro Hac Vice for Gregory F. Pesce (Fee Paid: $100, receipt number A26471810) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Pesce, Gregory) (Entered: 09/11/2025)
09/11/2025	151 (1 pg)	MOTION to Appear Pro Hac Vice for Scott Greissman (Fee Paid: $100, receipt number A26471848) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Greissman, Scott) (Entered: 09/11/2025)
09/11/2025	152 (1 pg)	MOTION to Appear Pro Hac Vice for Andrew Zatz (Fee Paid: $100, receipt number A26471859) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Zatz, Andrew) (Entered: 09/11/2025)
09/11/2025	153 (5 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 09/11/2025)
09/11/2025	154 (10 pgs)	Certificate *of Service re: 1) Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; 2) Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 3) 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 Forms 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 (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date)) (Gershbein, Evan) (Entered: 09/11/2025)
09/11/2025	155 (4 pgs)	Certificate *of Service (Supplemental) re: First Day Motions and Orders* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 28 Initial Order Complex Chapter 11, 57 Order on Emergency Motion, 113 Certificate) (Gershbein, Evan) (Entered: 09/11/2025)
09/11/2025	156 (3 pgs)	Certificate *of Service (Supplemental) re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):64 Order Setting Hearing, 128 Certificate) (Gershbein, Evan) (Entered: 09/11/2025)
09/12/2025	157 (1 pg)	Order Granting Motion for John Christopher Shore To Appear pro hac vice (Related Doc # 149) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	158 (1 pg)	Order Granting Motion for Gregory F. Pesce To Appear pro hac vice (Related Doc # 150) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	159 (1 pg)	Order Granting Motion for Scott Greissman To Appear pro hac vice (Related Doc # 151) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025	160 (1 pg)	Order Granting Motion for Andrew Zatz To Appear pro hac vice (Related Doc # 152) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/12/2025. (abh4) (Entered: 09/12/2025)
09/12/2025		Hearing Continued by Request (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date)) Contacted by Brandon Bell. Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 9/30/2025 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 09/12/2025)
09/12/2025	161 (3 pgs)	Notice *of Reset Hearing to Be Held on September 30, 2025, at 3:00 PM (Prevailing Central Time)*. (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 52 Order Setting Hearing, 59 Order Setting Hearing, 64 Order Setting Hearing, 106 Generic Order, Hearing (Bk) Cont) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/12/2025)

09/12/2025	162 (7 pgs)	Certificate *of Service (Supplemental) re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):64 Order Setting Hearing, 128 Certificate) (Gershbein, Evan) (Entered: 09/12/2025)
09/15/2025		*Notice of Time Change Only.* Hearing Times Reset by the Court (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date)) **Hearing scheduled for 9/30/2025 at 04:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 09/15/2025)
09/15/2025	163 (3 pgs)	Notice *of Reset Hearing to Be Held On September 30, 2025, at 4:00 p.m. (prevailing Central Time)*. (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 52 Order Setting Hearing, 59 Order Setting Hearing, 64 Order Setting Hearing, 106 Generic Order, 161 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/15/2025)
09/15/2025	165 (10 pgs)	Document by Jim Alan Adams (dm4) (Entered: 09/16/2025)
09/16/2025	164 (2 pgs)	Letter from ModivCare Inc. (bow4) (Entered: 09/16/2025)
09/16/2025	166 (21 pgs)	Stipulation By ModivCare Inc. and The Official Committee of Unsecured Creditors. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/16/2025)
09/16/2025	167 (8 pgs)	Stipulation By ModivCare Inc. and ACE American Insurance Company and Federal Insurance Company. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/16/2025)
09/17/2025	168 (3 pgs)	Notice of Appearance and Request for Notice Filed by Ricardo A Aguilar Filed by on behalf of Automotive Rentals, Inc. and ARI Fleet LT (Aguilar, Ricardo) (Entered: 09/17/2025)
09/17/2025	169 (1 pg)	MOTION to Appear Pro Hac Vice for Ricardo ("Richard") A. Aguilar (Fee Paid: $100, receipt number A26488414) Filed by Creditor Automotive Rentals, Inc. and ARI Fleet LT (Aguilar, Ricardo) (Entered: 09/17/2025)
09/17/2025	170 (3 pgs)	Notice of Appearance and Request for Notice Filed by Mark J. Chaney III Filed by on behalf of Automotive Rentals, Inc. and ARI Fleet LT (Chaney, Mark) (Entered: 09/17/2025)
09/17/2025	171 (1 pg)	MOTION to Appear Pro Hac Vice for Mark J. Chaney, III (Fee Paid: $100, receipt number A26488448) Filed by Creditor Automotive Rentals, Inc. and ARI Fleet LT (Chaney, Mark) (Entered: 09/17/2025)

09/17/2025	172 (2 pgs)	Letter from Michele Graham requesting paperwork (dah4) (Entered: 09/17/2025)
09/17/2025	173 (8 pgs)	Stipulation and Agreed Order Permitting the Ace Companies the Federal Companies to Each File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/17/2025 (Related document(s):167 Stipulation) (abh4) (Entered: 09/17/2025)
09/17/2025	174 (20 pgs)	Confidentiality Agreement and Stipulated Protective Order, Signed on 9/17/2025 (Related document(s):166 Stipulation) (abh4) (Entered: 09/17/2025)
09/17/2025	175 (1 pg)	Order Granting Motion for Ricardo "Richard" A. Aguilar To Appear pro hac vice (Related Doc # 169) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/17/2025. (abh4) (Main Document 175 replaced on 9/17/2025) (AkeitaHouse). (Entered: 09/17/2025)
09/17/2025	176 (1 pg)	Order Granting Motion for Mark J. Chaney, III To Appear pro hac vice (Related Doc # 171) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/17/2025. (abh4) (Entered: 09/17/2025)
09/17/2025	177 (59 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By A & B Homecare Solutions, L.L.C.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	178 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By A & B Homecare Solutions, L.L.C.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	179 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By A.E. Medical Alert, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	180 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By A.E. Medical Alert, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	181 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ABC Homecare LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	182 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ABC Homecare LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	183 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Aids Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	184 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Aids Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	185 (49 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Associate Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	186 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Associate Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	187 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro CGA Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	188 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro CGA Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	189 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Field Service Workers Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	190 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Field Service Workers Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	191 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Health Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	192 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Health Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	193 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors

		Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services of Florida, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	194 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services of Florida, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	195 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services of New Jersey, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	196 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services of New Jersey, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	197 (61 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services of New York, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	198 (62 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services of New York, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	199 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Home Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	200 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Home Care Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	201 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By All Metro Management and Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	202 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Management and Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	203 (48 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-

		Individual- Codebtors (Filed By All Metro Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	204 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By All Metro Payroll Services Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	205 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By AM Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	206 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By AM Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	207 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By AM Intermediate Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	208 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By AM Intermediate Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	209 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Arsens Home Care, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	210 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Arsens Home Care, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	211 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ARU Hospice Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	212 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ARU Hospice Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	213 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Associated Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	214 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Associated Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	215 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By At-Home Quality Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	216 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By At-Home Quality Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	217 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Auditory Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	218 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Auditory Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	219 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Barney's Medical Alert-ERS, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	220 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Barney's Medical Alert-ERS, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	221 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By California MedTrans Network IPA LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	222 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By California MedTrans Network IPA LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	223 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By California MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	224 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By California MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	225 (69 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-

		Individual- Codebtors (Filed By Care Finders Total Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	226 (58 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Care Finders Total Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	227 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers Alliance, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	228 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers Alliance, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	229 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Home Health Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	230 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Home Health Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	231 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Medical Staffing, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	232 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Medical Staffing, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	233 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Medical Supply, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	234 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Medical Supply, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	235 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CareGivers America Registry, LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	236 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CareGivers America Registry, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	237 (66 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Caregivers America, LLC.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	238 (56 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Caregivers America, LLC.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	239 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Caregivers On Call, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	240 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Caregivers On Call, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	241 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CGA Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	242 (54 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CGA Holdco, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	243 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By CGA Staffing Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	244 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By CGA Staffing Services, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	245 (72 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Circulation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	246 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Circulation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	247 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-

		Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Florida MedTrans Network LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	248 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Florida MedTrans Network LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	249 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Florida MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	250 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Florida MedTrans Network MSO LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	251 (62 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Guardian Medical Monitoring, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	252 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Guardian Medical Monitoring, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	253 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Health Trans, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	254 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Health Trans, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	255 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Healthcom Holdings LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	256 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Healthcom Holdings LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	257 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Healthcom, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	258 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Healthcom, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	259 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Helping Hand Home Health Care Agency Inc). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	260 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Helping Hand Home Health Care Agency Inc). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	261 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Helping Hand Hospice, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	262 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Helping Hand Hospice, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	263 (49 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi Care Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	264 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi Care Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	265 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	266 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi Care, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	267 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi SH Holdings Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	268 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi SH Holdings Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	269 (57 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Higi SH LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	270 (55 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Higi SH LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	271 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Independence Healthcare Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	272 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Independence Healthcare Corporation). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	273 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Metropolitan Medical Transportation IPA, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	274 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Metropolitan Medical Transportation IPA, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	275 (48 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By MLA Sales, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	276 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By MLA Sales, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	277 (938 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	278 (65 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	279 (783 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-

		Individual- Codebtors (Filed By ModivCare Solutions, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	280 (15 pgs; 2 docs)	Emergency Motion */ Emergency Motion and Notice of Debtors to Authorize Payments in Excess of Interim Cap Under Interim Critical Vendor Order* Filed by Debtor ModivCare Inc. Hearing scheduled for 9/18/2025 at 03:00 PM at telephone and video conference. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	281 (101 pgs)	Statement of Financial Affairs for Non-Individual (Filed By ModivCare Solutions, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	282 (57 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Multicultural Home Care Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	283 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Multicultural Home Care Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	284 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By National MedTrans, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	285 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By National MedTrans, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	286 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By New England Emergency Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	287 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By New England Emergency Response Systems, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	288 (5 pgs)	Declaration re: */ Declaration of Chad J. Shandler in Support of the Emergency Motion and Notice of Debtors to Authorize Payments in Excess of Interim Cap Under Interim Critical Vendor Order* (Filed By ModivCare Inc.).(Related document(s):280 Emergency Motion (with hearing date)) (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	289 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By OEP AM, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	290 (51 pgs)	Statement of Financial Affairs for Non-Individual (Filed By OEP AM, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	291 (54 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Panhandle Support Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	292 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Panhandle Support Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	293 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Personal In-Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	294 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Personal In-Home Services, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	295 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Philadelphia Home Care Agency, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	296 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Philadelphia Home Care Agency, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	297 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Provado Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	298 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Provado Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	299 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Red Top Transportation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	300 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Red Top Transportation, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	301 (60 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G

		Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Ride Plus, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	302 (53 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Ride Plus, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	303 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Safe Living Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	304 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Safe Living Technologies, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	305 (50 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Secura Home Health Holdings, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	306 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Secura Home Health Holdings, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	307 (4 pgs)	Notice *of Emergency Virtual Hearing on Emergency Motion and Notice of Debtors to Authorize Payments in Excess of Interim Cap Under Interim Critical Vendors Order*. (Related document(s):280 Emergency Motion (with hearing date)) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	308 (49 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Secura Home Health, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	309 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Secura Home Health, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	310 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual- Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Socrates Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	311 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Socrates Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	312 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By TriMed, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	313 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By TriMed, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	314 (235 pgs; 4 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):280 Emergency Motion (with hearing date), 307 Notice) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3) (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	315 (52 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Union Home Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	316 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Union Home Care LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	317 (92 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Valued Relationships, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	318 (205 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Valued Relationships, Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	319 (51 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By Victory Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	320 (52 pgs)	Statement of Financial Affairs for Non-Individual (Filed By Victory Health Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	321 (53 pgs)	Schedule A/B: Property Non-Individual , Schedule D Non-Individual-Creditors Having Claims Secured by Property , Schedule E/F: Creditors Who Have Unsecured Claims Non-Individual , Schedule G Non-Individual- Executory Contracts and Unexpired Leases , Schedule H Non-Individual- Codebtors (Filed By VRI Intermediate Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	322 (54 pgs)	Statement of Financial Affairs for Non-Individual (Filed By VRI Intermediate Holdings, LLC). (Davidson, Timothy) (Entered: 09/17/2025)

09/17/2025	323 (4 pgs)	Agenda for Hearing on 9/18/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/17/2025)
09/17/2025	324 (10 pgs)	Notice *of Filing of Periodic Report Pursuant to Federal Rule of Bankruptcy Procedure 2015.3*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/17/2025)
09/18/2025	325 (5 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	326 (20 pgs)	Certificate *of Service re: Notice of Reset Hearing to be Held on September 30, 2025, at 3:00 p.m. (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):161 Notice) (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	327 (20 pgs)	Certificate *of Service re: Notice of Reset Hearing to be Held on September 30, 2025, at 4:00 p.m. (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):163 Notice) (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	328 (9 pgs)	Certificate *of Service re: Documents Served on September 17, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):280 Emergency Motion (with hearing date), 288 Declaration, 307 Notice, 314 Witness List, Exhibit List, 323 Agenda, 324 Notice) (Gershbein, Evan) (Entered: 09/18/2025)
09/18/2025	329 (2 pgs)	Notice of Appearance and Request for Notice Filed by Jason A. Starks Filed by on behalf of Travis County (Starks, Jason) (Entered: 09/18/2025)
09/18/2025	330 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc.. This is to order a transcript of Emergency Hearing, September 18, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bell, Brandon) Electronically forwarded to Judicial Transcribers of Texas on 9/18/2025. Estimated completion date: 9/19/2025. Modified on 9/18/2025 (smg4). (Entered: 09/18/2025)
09/18/2025	331 (1 pg)	Courtroom Minutes. Time Hearing Held: 3:00 PM to 3:26 PM. Appearances: see log. Additional appearances: Matt Warren. Admitted Exhibits: ECF Nos.314-3. Emergency motion hearing held. Oral argument heard on the record. Parties will work together to agree on the language for the proposed order. If an agreement cannot be reached, each party may submit a separate proposed order for the Courts review. All proposed orders must be filed by 9:00 AM CST on 9/19/2025. Parties should notify the Case Manager that the submission has been made. ERO: yes. (Related document(s):280 Emergency Motion (with hearing date)) (abh4) (Entered: 09/18/2025)
09/18/2025	332 (1 pg)	PDF with attached Audio File. Court Date & Time [9/18/2025 3:00:06 PM]. File Size [12537 KB]. Run Time [00:26:07]. (admin). (Entered: 09/18/2025)
09/18/2025	333 (8 pgs; 2 docs)	Proposed Order Submission After Hearing (Filed By ModivCare Inc.). (Related document(s):280 Emergency Motion (with hearing date))

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		(Attachments: # 1 Exhibit A (Redline)) (Davidson, Timothy) (Entered: 09/18/2025)
09/18/2025	334 (3 pgs)	Order Authorizing Debtors to Make Payments in Excess of Interim Cap Under Interim Critical Vendor Order (Related Doc # 280) Signed on 9/18/2025. (tjl4) (Entered: 09/18/2025)
09/18/2025	335 (17 pgs; 2 docs)	Motion / *Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/18/2025)
09/18/2025	336 (27 pgs; 2 docs)	Motion / *Motion of Debtors for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/18/2025)
09/18/2025	337 (20 pgs; 2 docs)	Omnibus Motion to Reject Lease or Executory Contract / *Debtors' Omnibus Motion for Entry of an Order Authorizing the Debtors to (A) Reject Certain Unexpired Leases and (B) Abandon Certain Remaining Personal Property in Connection Therewith* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 09/18/2025)
09/19/2025	338 (79 pgs; 4 docs)	Application to Employ Latham & Watkins LLP as Bankruptcy Co-Counsel. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Klidonas Declaration) # 2 Exhibit B (Retention Declaration) # 3 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	339 (60 pgs; 4 docs)	Application to Employ Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Davidson Declaration) # 2 Exhibit B (Engagement Letter) # 3 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	340 (96 pgs; 3 docs)	Application to Employ Moelis & Company LLC as Investment Banker and Placement Agent. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Jamal Declaration) # 2 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	341 (81 pgs; 3 docs)	Application to Employ FTI Consulting, Inc. as Financial Advisor. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Shandler Declaration) # 2 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)
09/19/2025	342 (216 pgs; 3 docs)	Application to Employ Ernst & Young LLP as Tax, Consulting, Accounting, and Valuation Services Provider. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A (Lazzeri Declaration) # 2 Proposed Order) (Davidson, Timothy) (Entered: 09/19/2025)

09/19/2025	343 (1 pg)	Notice of Appearance and Request for Notice Filed by Diane Wade Sanders Filed by on behalf of San Marcos CISD, Hays CISD, McLennan County, City Of McAllen, Hidalgo County, Cameron County, Nueces County (Sanders, Diane) (Entered: 09/19/2025)
09/22/2025		Meeting of Creditors Held. Debtor appeared and participated by and through the designated representative, Chad J. Shandler. Hearing concluded on September 22, 2025. (Whitworth, Jana) (Entered: 09/22/2025)
09/22/2025	344 (1 pg)	MOTION to Appear Pro Hac Vice for Jamie L. Wine (Fee Paid: $100, receipt number A26501385) Filed by Debtor ModivCare Inc. (Bailey, Kaleb) (Entered: 09/22/2025)
09/22/2025		*Notice of Time Change Only.* Hearing Time Reset by Request (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date)) Contacted by Brandon Bell. Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 9/30/2025 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 09/22/2025)
09/23/2025	345 (1 pg)	Order Granting Motion for Jamie Wine To Appear pro hac vice (Related Doc # 344) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/23/2025. (abh4) (Entered: 09/23/2025)
09/23/2025	346 (123 pgs)	Objection *of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion* (related document(s):4 Emergency Motion (with hearing date)). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 09/23/2025)
09/23/2025	347 (3 pgs)	Notice *of Reset Hearing to be Held on September 30, 2025, at 3:00 p.m. (Prevailing Central Time)*. (Related document(s):4 Emergency Motion (with hearing date), 6 Emergency Motion (with hearing date), 16 Emergency Motion (with hearing date), 52 Order Setting Hearing, 59 Order Setting Hearing, 64 Order Setting Hearing, 106 Generic Order, 161 Notice, 163 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/23/2025)
09/23/2025	348 (3 pgs)	Notice *of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/23/2025)
09/23/2025	349	Sealed Document / *Declaration of David MacGreevey in Support of the Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 09/23/2025)
09/23/2025	350 (30 pgs)	Notice *of Filing of (I) Liquidation Analysis, (II) Financial Projections, and (III) Valuation Analysis With Respect to Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):120 Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/23/2025)

09/23/2025	351 (8 pgs)	Certificate *of Service re: Order Authorizing Debtors to Make Payments in Excess of Interim Cap Under Interim Critical Vendor Order* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):334 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/23/2025)
09/23/2025	352 (13 pgs)	Certificate *of Service re: 1) Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals; 2) Motion of Debtors for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business; and 3) Debtors Omnibus Motion for Entry of an Order Authorizing the Debtors to (A) Reject Certain Unexpired Leases and (B) Abandon Certain Remaining Personal Property in Connection Therewith* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):335 Generic Motion, 336 Generic Motion, 337 Motion to Reject Lease or Executory Contract) (Gershbein, Evan) (Entered: 09/23/2025)
09/23/2025	381 (1 pg)	Letter from John W Behnken Jr (cng4) (Entered: 09/29/2025)
09/24/2025	353 (3050 pgs)	Certificate *of Service re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion) (Gershbein, Evan) (Entered: 09/24/2025)
09/24/2025	354 (3043 pgs)	Certificate *of Service re: Notice of Hearing to Consider Approval of the Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):122 Emergency Motion (with hearing date)) (Gershbein, Evan) (Entered: 09/24/2025)
09/24/2025	355 (9 pgs)	Certificate *of Service re: Documents Served on September 19, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):338 Application to Employ, 339 Application to Employ, 340 Application to Employ, 341 Application to Employ, 342 Application to Employ) (Gershbein, Evan) (Entered: 09/24/2025)
09/24/2025	356 (6 pgs)	Stipulation By ModivCare Inc. and Wilmington Savings Fund Society, FSB. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/24/2025)
09/25/2025	357 (1 pg)	MOTION to Appear Pro Hac Vice for Jason N. Zakia (Fee Paid: $100, receipt number A26509321) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Zakia, Jason) (Entered: 09/25/2025)
09/25/2025	358 (6 pgs)	Stipulation and Agreed Order Permitting Wilmington Savings Fund Society, FSB, as the Unsecured Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/25/2025

		(Related document(s):66 Order on Emergency Motion, 356 Stipulation) (abh4) (Entered: 09/25/2025)
09/25/2025	359 (6 pgs)	Stipulation By ModivCare Inc. and JPMorgan Chase Bank, N.A. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/25/2025)
09/25/2025	360 (6 pgs)	Stipulation By ModivCare Inc. and Ankura Trust Company, LLC. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/25/2025)
09/25/2025	361 (25 pgs; 3 docs)	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* (Filed By ModivCare Inc.).(Related document(s):16 Emergency Motion (with hearing date), 59 Order Setting Hearing) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 09/25/2025)
09/25/2025	362 (72 pgs; 2 docs)	Application to Employ Quinn Emanuel Urquhart & Sullivan, LLP as Counsel to the Special Committee of the Debtors. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 09/25/2025)
09/26/2025	363 (1 pg)	Order Granting Motion for Jason N. Zakia To Appear pro hac vice (Related Doc # 357) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/26/2025. (abh4) (Entered: 09/26/2025)
09/26/2025	364	Sealed Document , Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18) (Davidson, Timothy) (Entered: 09/26/2025)
09/26/2025	365 (5 pgs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 09/26/2025)
09/26/2025	366 (2146 pgs; 19 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):364 Sealed Document, Witness List, Exhibit List) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 (Filed Under Seal) # 17 Exhibit 17 (Filed Under Seal) # 18 Exhibit 18 (Filed Under Seal)) (Davidson, Timothy) (Entered: 09/26/2025)
09/26/2025	367 (2 pgs)	Creditor Request for Notices (Filed By Wick Companies LLC). (Lemkin, Joseph) (Entered: 09/26/2025)

09/26/2025	368 (1 pg)	Notice of Appearance and Request for Notice Filed by Stephen R. Butler Filed by on behalf of TN Dept of Revenue (Butler, Stephen) (Entered: 09/26/2025)
09/26/2025	369 (23 pgs; 2 docs)	Transcript RE: Motion Hearing held on September 18, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 12/29/2025. (mhen) (Entered: 09/26/2025)
09/26/2025	370 (884 pgs; 7 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 7) (Koster, Charles) (Entered: 09/26/2025)
09/26/2025	371 (1 pg)	MOTION to Appear Pro Hac Vice for Jacorius J. Williams (Fee Paid: $100, receipt number A26514817) Filed by Creditor ROC II Fairlead Gran Park Avenues LLC (Williams, Jacorius) (Entered: 09/26/2025)
09/26/2025	372	Sealed Document / *The Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for Hearing Scheduled for September 30, 2025, at 3:00 p.m. (Prevailing Central Time) (Sealed Exhibits)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 6 # 2 Exhibit 8 # 3 Exhibit 9 # 4 Exhibit 10 # 5 Exhibit 11 # 6 Exhibit 12 # 7 Exhibit 13 # 8 Exhibit 14 # 9 Exhibit 15 # 10 Exhibit 16 # 11 Exhibit 17 # 12 Exhibit 18 # 13 Exhibit 19) (Koster, Charles) (Entered: 09/26/2025)
09/26/2025	373 (21 pgs)	Certificate *of Service re: 1) Notice of Reset Hearing to be Held on September 30, 2025, at 3:00 p.m. (Prevailing Central Time); 2) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology; and 3) Notice of Filing of (I) Liquidation Analysis, (II) Financial Projections, and (III) Valuation Analysis with Respect to Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):347 Notice, 348 Notice, 350 Notice) (Gershbein, Evan) (Entered: 09/26/2025)
09/28/2025	374 (12 pgs)	BNC Certificate of Mailing. (Related document(s):369 Transcript) No. of Notices: 79. Notice Date 09/28/2025. (Admin.) (Entered: 09/28/2025)
09/29/2025	375 (1 pg)	Order Granting Motion for Jacorius J. Williams To Appear pro hac vice (Related Doc # 371) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/29/2025. (abh4) (Entered: 09/29/2025)
09/29/2025	376 (19 pgs; 3 docs)	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* (Filed By ModivCare Inc.).(Related document(s):6 Emergency Motion (with hearing date), 64 Order Setting Hearing, 334 Order on Emergency Motion) (Attachments: # 1

		Exhibit A (Revised Proposed Final Critical Vendors Order) # 2 Exhibit B (Redline)) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	377 (203 pgs; 6 docs)	Reply */ Debtors' Reply to Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion* (related document(s):4 Emergency Motion (with hearing date)). Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Proposed Order # 2 Exhibit B - Redline # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	378 (24 pgs)	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* (related document(s):4 Emergency Motion (with hearing date)). Filed by First Lien Agent, Consenting Creditors, and DIP Lenders (Warren, Matthew) (Entered: 09/29/2025)
09/29/2025	379 (4 pgs)	Witness List (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) (Entered: 09/29/2025)
09/29/2025	380 (5 pgs)	Notice of Appearance and Request for Notice Filed by Andrew D. Behlmann Filed by on behalf of Proposed Lead Plaintiff and the Proposed Class (Behlmann, Andrew) (Entered: 09/29/2025)
09/29/2025	382 (28 pgs)	Objection *Of Proposed Lead Plaintiff To The Disclosure Statement And Solicitation Procedures Related To The Joint Chapter 11 Plan Of Reorganization Of Modivcare Inc. And Its Debtor Affiliates* (related document(s):122 Emergency Motion (with hearing date)). Filed by Proposed Lead Plaintiff and the Proposed Class (Behlmann, Andrew) (Entered: 09/29/2025)
09/29/2025	383 (33 pgs)	Statement */ Exhibit A to Objection Of Proposed Lead Plaintiff To The Disclosure Statement And Solicitation Procedures Related To The Joint Chapter 11 Plan Of Reorganization Of Modivcare Inc. And Its Debtor Affiliates* (Filed By Proposed Lead Plaintiff and the Proposed Class). (Related document(s):382 Objection) (Behlmann, Andrew) (Entered: 09/29/2025)
09/29/2025	384 (3 pgs)	Notice of Appearance and Request for Notice Filed by Jacorius Williams Filed by on behalf of ROC II Fairlead Gran Park Avenues LLC (Williams, Jacorius) (Entered: 09/29/2025)
09/29/2025	385 (169 pgs; 2 docs)	Proposed Order RE: *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* (Filed By ModivCare Inc.).(Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order, 377 Reply) (Attachments: # 1 Redline) (Davidson, Timothy) (Entered: 09/29/2025)

09/29/2025	386 (6 pgs)	Stipulation and Agreed Order Permitting the First Lien Administrative Agent to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/29/2025 (Related document(s):66 Order on Emergency Motion, 359 Stipulation) (abh4) (Entered: 09/29/2025)
09/29/2025	387 (6 pgs)	Stipulation and Agreed Order Permitting Ankura Trust Company, LLC, as the Second Lien Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number, Signed on 9/29/2025 (Related document(s):66 Order on Emergency Motion, 360 Stipulation) (abh4) (Entered: 09/29/2025)
09/29/2025	388 (11 pgs)	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, Signed on 9/29/2025 (Related document(s):16 Emergency Motion (with hearing date), 59 Order Setting Hearing) (abh4) (Entered: 09/29/2025)
09/29/2025	389 (6 pgs)	Stipulation By ModivCare Inc. and Humana, Inc., Humana Military, Humana Insurance Company of Florida, Humana Health Benefit Plan of South Carolina, Humana Wisconsin Health Organization, and their affiliates. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):66 Order on Emergency Motion) (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	390 (5 pgs)	Agenda for Hearing on 9/30/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	391 (11 pgs)	Certificate *of Service re: 1) Debtors Application for Entry of an Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee of the Debtors Effective as of September 15, 2025; and 2) Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):362 Application to Employ, 366 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 09/29/2025)
09/29/2025	392 (6 pgs)	Certificate *of Service re: Agenda of Debtors for Matters Set for Hearing on September 30, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):390 Agenda) (Gershbein, Evan) (Entered: 09/29/2025)
09/29/2025	393 (3 pgs)	Notice *of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 09/29/2025)
09/29/2025	424	Marriage and Death Certificate by Dianne Clark (dah4) (Entered: 10/02/2025)
09/30/2025	394 (7 pgs)	Final Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (B) Granting Related Relief, Signed on 9/30/2025 (Related document(s):6 Emergency Motion (with hearing date), 64 Order Setting Hearing) (abh4) (Entered: 09/30/2025)
09/30/2025	395 (6 pgs)	Stipulation and Agreed Order Permitting Humana Inc. and Its Subsidiaries to File a Consolidated Proof of Claim Under a Single Case

		Number, Signed on 9/30/2025 (Related document(s):66 Order on Emergency Motion, 389 Stipulation) (abh4) (Entered: 09/30/2025)
09/30/2025	396 (1 pg)	MOTION to Appear Pro Hac Vice for Charles Craig Eller (Fee Paid: $100, receipt number A26521828) Filed by Creditor Miami Lakes Center, LLC (Eller, Charles) (Entered: 09/30/2025)
09/30/2025	397 (31 pgs)	Response/Objection Filed by US Trustee. (Related document(s):122 Emergency Motion (with hearing date)) (Whitworth, Jana) (Entered: 09/30/2025)
09/30/2025	398 (11 pgs; 2 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors).(Related document(s):370 Witness List, Exhibit List, 372 Sealed Document) (Attachments: # 1 Exhibit 20) (Koster, Charles) (Entered: 09/30/2025)
09/30/2025	399 (1 pg)	Order Granting Motion for Charles Craig Eller To Appear pro hac vice (Related Doc # 396) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 9/30/2025. (abh4) (Entered: 09/30/2025)
09/30/2025	400 (279 pgs)	Certificate *(Supplemental) re 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 122 Emergency Motion (with hearing date)) (Gershbein, Evan) (Entered: 09/30/2025)
09/30/2025	401 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Hearing held on September 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/1/2025. Estimated completion date: 10/2/2025. Modified on 10/1/2025 (sew4). (Entered: 09/30/2025)
09/30/2025	402 (1 pg)	Courtroom Minutes. Time Hearing Held: 3:01 pm - 4:36 pm, 6:33 pm - 8:34 pm. Appearances: See attached. Additional appearances: Ray Schrock and Tad Davidson. Witnesses sworn in and testimony given: Chad Shandler, Zul Jamal, David MacGreevey. Exhibits admitted: ECF Nos. 364-3 through 364-9, 364-11 through 364-18; 398-1, 398-4, 398-5, 398-7 through 398-20, Committees Exhibit 21 January 2025 Projections, Exhibit 23, Exhibit 24. Oral argument heard. Hearing continued to 10/3/25 at 12:00 pm. (Related document(s):4 Emergency Motion (with hearing date)) **Hearing scheduled for 10/3/2025 at 12:00 PM at telephone and video conference.** (tjl4) (Entered: 09/30/2025)
09/30/2025	403 (1 pg)	PDF with attached Audio File. Court Date & Time [9/30/2025 3:01:31 PM]. File Size [45629 KB]. Run Time [01:35:04]. (admin). (Entered: 09/30/2025)
09/30/2025	404 (1 pg)	PDF with attached Audio File. Court Date & Time [9/30/2025 6:33:54 PM]. File Size [56647 KB]. Run Time [01:58:01]. (admin). (Entered: 09/30/2025)

09/30/2025	405 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order Permitting Wilmington Savings Fund Society, FSB, as the Unsecured Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):358 Generic Order) (Gershbein, Evan) (Entered: 09/30/2025)
09/30/2025	406 (34 pgs)	Certificate *of Service (Supplemental) re: 1) Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief; 2) Notice of Hearing to Consider Approval of the Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; 3) Notice of Chapter 11 Bankruptcy Case; 4) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 5) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 122 Emergency Motion (with hearing date), 128 Certificate, 353 Certificate, 354 Certificate) (Gershbein, Evan) (Entered: 10/01/2025)
10/01/2025	407 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Paul Hastings LLP. This is to order a transcript of September 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Veritext Legal Solutions (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/1/2025. Estimated completion date: 10/2/2025. Modified on 10/1/2025 (sew4). (Entered: 10/01/2025)
10/01/2025	408 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the September 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/1/25. Estimated completion date: 10/2/2025. Modified on 10/1/2025 (sew4). (Entered: 10/01/2025)
10/01/2025	409 (32 pgs; 2 docs)	Motion *Of Securities Litigation Proposed Lead Plaintiff For Entry Of An Order (I) Authorizing Proposed Lead Plaintiff To Opt Out Of Third-Party Release On Behalf Of The Proposed Class Or Confirming Such Authority Or, Alternatively, (II) Certifying The Proposed Class For A Limited Purpose* Filed by Interested Party Proposed Lead Plaintiff and the Proposed Class (Attachments: # 1 Exhibit A - Proposed Order) (Behlmann, Andrew) (Entered: 10/01/2025)
10/01/2025	410 (2 pgs)	Creditor Request for Notices (Filed By Oracle America, Inc.). (Christianson, Shawn) (Entered: 10/01/2025)
10/01/2025	411 (6 pgs)	Certificate *of Service* (Filed By Proposed Lead Plaintiff and the Proposed Class).(Related document(s):409 Generic Motion) (Behlmann, Andrew) (Entered: 10/01/2025)
10/01/2025	412 (9 pgs; 2 docs)	Motion to Extend Time *for Debtors to Comply with Section 345(b) of the Bankruptcy Code* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/01/2025)

10/01/2025	413 (17 pgs)	BNC Certificate of Mailing. (Related document(s):386 Generic Order) No. of Notices: 79. Notice Date 10/01/2025. (Admin.) (Entered: 10/01/2025)
10/01/2025	414 (17 pgs)	BNC Certificate of Mailing. (Related document(s):387 Generic Order) No. of Notices: 79. Notice Date 10/01/2025. (Admin.) (Entered: 10/01/2025)
10/01/2025	415 (22 pgs)	BNC Certificate of Mailing. (Related document(s):388 Generic Order) No. of Notices: 79. Notice Date 10/01/2025. (Admin.) (Entered: 10/01/2025)
10/01/2025	416 (185 pgs)	Exhibit Regarding Claim by Excel Medical Transportation LLC (amp4) (Entered: 10/02/2025)
10/01/2025	417 (188 pgs)	Exhibit Regarding Claim by Excel Medical Transportation LLC (amp4) (Entered: 10/02/2025)
10/01/2025	418 (146 pgs)	Exhibit Regarding Claim by Excel Medical Transportation LLC (amp4) (Entered: 10/02/2025)
10/02/2025	419 (3 pgs)	Notice of Appearance and Request for Notice Filed by Benjamin Todd Trotter Filed by on behalf of Dimmit County (Trotter, Benjamin) (Entered: 10/02/2025)
10/02/2025	420 (1 pg)	MOTION to Appear Pro Hac Vice for Erin Smith (Fee Paid: $100, receipt number A26530906) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/02/2025)
10/02/2025	421 (22 pgs)	Objection *of The Official Committee of Unsecured Creditors to the Debtors Emergency Motion for Approval of the Disclosure Statement and Related Solicitation Procedures* (related document(s):122 Emergency Motion (with hearing date)). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/02/2025)
10/02/2025	422 (118 pgs)	Declaration re: */ Declaration of Erin M. Smith In Support of the Objection of The Official Committee of Unsecured Creditors to the Debtors' Emergency Motion for Approval of the Disclosure Statement and Related Solicitation Procedures* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):421 Objection) (Koster, Charles) (Entered: 10/02/2025)
10/02/2025	423 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 10/02/2025)
10/02/2025	425 (3 pgs)	Motion to Withdraw as Attorney. Objections/Request for Hearing Due in 21 days. Filed by Creditor ROC II Fairlead Gran Park Avenues LLC (Williams, Jacorius) (Entered: 10/02/2025)
10/02/2025	426 (181 pgs; 2 docs)	Transcript RE: Motion Hearing held on September 30, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on

		PACER. Filed by Transcript access will be restricted through 12/31/2025. (mhen) (Entered: 10/02/2025)
10/02/2025	427 (21 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Permitting the First Lien Administrative Agent to File a Consolidated Proof of Claim Under a Single Case Number; 2) Stipulation and Agreed Order Permitting Ankura Trust Company, LLC, as the Second Lien Notes Trustee, to File a Consolidated Proof of Claim Under a Single Case Number; and 3) 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):386 Generic Order, 387 Generic Order, 388 Generic Order) (Gershbein, Evan) (Entered: 10/02/2025)
10/03/2025	428 (1 pg)	Order Granting Motion for Erin Smith To Appear pro hac vice (Related Doc # 420) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/3/2025. (abh4) (Entered: 10/03/2025)
10/03/2025	429 (9 pgs)	Notice *of Unresolved Issues Regarding Entry of Final DIP Order in Advance of Continued Final DIP Hearing*. (Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order, 346 Objection, 377 Reply, 378 Reply, 402 Courtroom Minutes) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	430 (443 pgs; 10 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	431 (124 pgs; 2 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1) (Koster, Charles) (Entered: 10/03/2025)
10/03/2025	432 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Hearing held on October 3, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/3/2025. Estimated completion date: 10/4/2025. Modified on 10/3/2025 (sew4). (Entered: 10/03/2025)
10/03/2025	433 (1 pg)	USB Exhibit Relating to Proof of Claim by Lalla Nabila Azallali El Idissi (cak4) (Entered: 10/03/2025)
10/03/2025	434 (1 pg)	Courtroom Minutes. Time Hearing Held: 12:00 pm - 12:30 pm. Appearances: See attached. The Court heard oral argument. Revised form of order to be filed by counsel for the motion with a redline as stated on the record. (Related document(s):4 Emergency Motion (with hearing date)) (tjl4) (Entered: 10/03/2025)
10/03/2025	435 (5 pgs)	Witness List, Exhibit List (Filed By Proposed Lead Plaintiff and the Proposed Class).(Related document(s):382 Objection) (Behlmann, Andrew) (Entered: 10/03/2025)

10/03/2025	436 (2 pgs)	Certificate *of Service* (Filed By Proposed Lead Plaintiff and the Proposed Class).(Related document(s):435 Witness List, Exhibit List) (Behlmann, Andrew) (Entered: 10/03/2025)
10/03/2025	437 (1 pg)	PDF with attached Audio File. Court Date & Time [10/3/2025 12:01:36 PM]. File Size [13858 KB]. Run Time [00:28:52]. (admin). (Entered: 10/03/2025)
10/03/2025	438 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by First Lien Parties. This is to order a transcript of October 3, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/7/2025. Estimated completion date: 10/8/2025. Modified on 10/7/2025 (anc4). (Entered: 10/03/2025)
10/03/2025	439	Sealed Document | *Motion of Debtors For Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	440 (23 pgs; 2 docs)	Redacted Document By ModivCare Inc.. The unredacted document will be filed under seal in paper with the Clerk. (Filed By ModivCare Inc.). (Related document(s):439 Sealed Document) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	441 (7 pgs; 2 docs)	Motion to Seal | *Debtors' Motion to Seal Exhibit to Motion of Debtors For Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/03/2025)
10/03/2025	442 (22 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 1, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 55 Order on Emergency Motion, 66 Order on Emergency Motion, 122 Emergency Motion (with hearing date), 126 Certificate, 128 Certificate, 353 Certificate, 354 Certificate) (Gershbein, Evan) (Entered: 10/03/2025)
10/04/2025	443 (293 pgs)	Certificate *of Service re: 1) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology; 2) Final Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of Business and (B) Granting Related Relief; and 3) Stipulation and Agreed Order Permitting Humana Inc. and its Subsidiaries to File a Consolidated Proof of Claim Under a Single Case Number* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):393 Notice, 394 Generic Order, 395 Generic Order) (Gershbein, Evan) (Entered: 10/04/2025)

10/04/2025	444 (12 pgs)	Certificate *of Service re: Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):430 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 10/04/2025)
10/04/2025	445 (66 pgs)	First Amended Chapter 11 Plan Filed by ModivCare Inc.. (Related document(s):119 Chapter 11 Plan) (Davidson, Timothy) (Entered: 10/04/2025)
10/04/2025	446 (141 pgs)	Amended Disclosure Statement Filed by ModivCare Inc.. (Related document(s):120 Disclosure Statement) (Davidson, Timothy) (Entered: 10/04/2025)
10/04/2025	447 (363 pgs)	Notice *of Filing of (I) First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates; and (II) Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date), 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/04/2025)
10/05/2025	448 (27 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):122 Emergency Motion (with hearing date), 382 Objection, 397 Response/Objection, 421 Objection) (Davidson, Timothy) (Entered: 10/05/2025)
10/05/2025	449 (13 pgs)	BNC Certificate of Mailing. (Related document(s):426 Transcript) No. of Notices: 81. Notice Date 10/05/2025. (Admin.) (Entered: 10/05/2025)
10/05/2025	450 (572 pgs)	Notice *of Filing of Revised Proposed 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 Forms 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*. (Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date), 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/05/2025)
10/05/2025	451 (245 pgs)	Proposed Order RE: *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 Forms 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* (Filed By ModivCare Inc.).(Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement, 122 Emergency Motion (with hearing date), 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) (Davidson, Timothy) (Entered: 10/05/2025)
10/05/2025	452 (14 pgs)	Notice *of Filing of Liquidation Analysis With Respect to Disclosure Statement For First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):350

		Notice, 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/05/2025)
10/06/2025	453 (479 pgs; 10 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):122 Emergency Motion (with hearing date), 430 Witness List, Exhibit List, 445 Amended Chapter 11 Plan, 446 Amended Disclosure Statement) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	454 (5 pgs)	Agenda for Hearing on 10/6/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	455 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Hearing held on October 6, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/7/25. Estimated completion date: 10/8/2025. Modified on 10/7/2025 (anc4). (Entered: 10/06/2025)
10/06/2025	456 (26 pgs; 2 docs)	Transcript RE: Continued Hearing held on October 3, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/5/2026. (mhen) (Entered: 10/06/2025)
10/06/2025	457 (245 pgs)	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 Forms 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, Signed on 10/6/2025 (Related document(s):122 Emergency Motion (with hearing date)) **Confirmation hearing to be held on 11/18/2025 at 08:00 AM at telephone and video conference.** (abh4) (Entered: 10/06/2025)
10/06/2025	458 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 am to 10:12 am. Appearances: see log. Additional appearances: Andrew Behlmann and Lindsay Sklar. Motion hearing held. Oral argument heard on the record. The Court approves the disclosure statement for reasons stated on the record. Regarding motion 409, parties are encouraged to draft an agreed conditional order otherwise the Court will set a hearing for next week. ERO: yes. (Related document(s):122 Emergency Motion (with hearing date), 409 Generic Motion) (abh4) (Entered: 10/06/2025)
10/06/2025		Hearing Set On (Related document(s):445 Amended Chapter 11 Plan) **Confirmation hearing to be held on 11/18/2025 at 08:00 AM at telephone and video conference.** (abh4) (Entered: 10/06/2025)
10/06/2025	459 (1 pg)	PDF with attached Audio File. Court Date & Time [10/6/2025 9:00:25 AM]. File Size [34057 KB]. Run Time [01:10:57]. (admin). (Entered: 10/06/2025)

10/06/2025	460 (1 pg)	MOTION to Appear Pro Hac Vice for David K May (Fee Paid: $100, receipt number A26538990) Filed by Interested Party Debra Jones (May, David) (Entered: 10/06/2025)
10/06/2025	461 (1 pg)	Order Granting Motion for David K. May To Appear pro hac vice (Related Doc # 460) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/6/2025. (abh4) (Entered: 10/06/2025)
10/06/2025		Hearing Set by the Court (Related document(s):4 Emergency Motion (with hearing date)) **Status conference to be held on 10/6/2025 at 04:00 PM at telephone and video conference.** (tjl4) (Entered: 10/06/2025)
10/06/2025	462 (160 pgs; 3 docs)	Notice *of Filing of Revised Proposed Final DIP Order*. (Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order, 385 Proposed Order) Filed by ModivCare Inc. (Attachments: # 1 Proposed Order # 2 Exhibit A (Redline)) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025		*Notice of Cancellation of Hearing.* The status conference previously scheduled for 10/6/25 at 4:00 pm is *canceled*. (Related document(s): 4) (tjl4) (Entered: 10/06/2025)
10/06/2025	463 (76 pgs)	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) Granting Related Relief, Signed on 10/6/2025 (Related document(s):4 Emergency Motion (with hearing date), 106 Generic Order) (abh4) (Entered: 10/06/2025)
10/06/2025	464 (4 pgs)	Notice of Appearance and Request for Notice Filed by Sean Thomas Wilson Filed by on behalf of Coliseum Capital Partners, L.P. (Wilson, Sean) (Entered: 10/06/2025)
10/06/2025	465 (66 pgs)	First Amended Chapter 11 Plan Filed by ModivCare Inc.. (Related document(s):119 Chapter 11 Plan, 120 Disclosure Statement) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	466 (233 pgs)	Amended Disclosure Statement Filed by ModivCare Inc.. (Related document(s):120 Disclosure Statement) (Davidson, Timothy) (Entered: 10/06/2025)
10/06/2025	467 (257 pgs)	Notice *of Filing of Solicitation Versions of Plan and Disclosure Statement*. (Related document(s):465 Amended Chapter 11 Plan, 466 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/06/2025)
10/07/2025	468 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the October 6, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/08/2025. Estimated completion date: 10/09/2025. Modified on 10/8/2025 (bow4). (Entered: 10/07/2025)

10/08/2025	469 (2 pgs)	Ex Parte MOTION to Appear Pro Hac Vice for Frederick L. Bunol (Fee Paid: $100, receipt number A26546826) Filed by Creditor Mae Ella Robertson (Bunol, Frederick) (Entered: 10/08/2025)
10/08/2025	470 (2 pgs)	Ex Parte MOTION to Appear Pro Hac Vice for McKenna D Dorais (Fee Paid: $100, receipt number A26546965) Filed by Creditor Mae Ella Robertson (Dorais, McKenna) (Entered: 10/08/2025)
10/08/2025	471 (31 pgs; 5 docs)	Motion for Relief from Stay *to Determine Inapplicability of Stay to Non-Debtors and Continue Litigation with Recovery Limited to Debtor Insurance*. Fee Amount $199. Filed by Creditor Thresa Lyons Hearing scheduled for 10/30/2025 at 11:00 AM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Proposed Order # 2 Exhibit A # 3 Exhibit B # 4 Exhibit C) (Norwood, Bach) (Entered: 10/08/2025)
10/08/2025		Receipt of Motion for Relief From Stay(25-90309) [motion,mrlfsty] (199.00) Filing Fee. Receipt number A26548784. Fee amount $ 199.00. (U.S. Treasury) (Entered: 10/08/2025)
10/08/2025	472 (47 pgs)	Application to Employ. Objections/Request for Hearing Due in 21 days. Filed by Creditor Committee Official Committee Of Unsecured Creditors (Pesce, Gregory) (Entered: 10/08/2025)
10/08/2025	473 (80 pgs)	Application to Employ. Objections/Request for Hearing Due in 21 days. Filed by Creditor Committee Official Committee Of Unsecured Creditors (Pesce, Gregory) (Entered: 10/08/2025)
10/08/2025		Hearing Set by Request (Related document(s):1 Voluntary Petition (Chapter 11)) Parties contacted the Case Manager. **Status conference to be held on 10/10/2025 at 08:30 AM at telephone and video conference only.** (tjl4) (Entered: 10/08/2025)
10/08/2025	474 (56 pgs; 2 docs)	Transcript RE: Disclosure Statement Hearing held on October 6, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/6/2026. (mhen) (Entered: 10/08/2025)
10/08/2025	475 (11 pgs)	Certificate *of Service re: Motion of Debtors for Entry of an Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):412 Motion to Extend Time) (Gershbein, Evan) (Entered: 10/08/2025)
10/08/2025	476 (16 pgs)	Certificate *of Service re: Notice of Unresolved Issues Regarding Entry of Final DIP Order in Advance of Continued Final DIP Hearing* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):429 Notice) (Gershbein, Evan) (Entered: 10/08/2025)
10/08/2025	477 (9 pgs)	Certificate *of Service re: 1) Notice of Filing of Revised Proposed 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 Forms 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; 2) Notice of Filing of (I) First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and (II) Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 3) Agenda of Debtors for Matters Set for Hearing on October 6, 2025 (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):447 Notice, 450 Notice, 454 Agenda) (Gershbein, Evan) (Entered: 10/08/2025)
10/08/2025	478 (16 pgs)	Certificate *of Service re: 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, and (E) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):463 Generic Order) (Gershbein, Evan) (Entered: 10/08/2025)
10/09/2025	479 (2 pgs)	Order Granting Motion for Frederick L. Bunol To Appear pro hac vice (Related Doc # 469) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/9/2025. (abh4) (Entered: 10/09/2025)
10/09/2025	480 (2 pgs)	Order Granting Motion for McKenna D. Dorais To Appear pro hac vice (Related Doc # 470) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/9/2025. (abh4) (Entered: 10/09/2025)
10/09/2025	481 (4 pgs)	Notice of Appearance and Request for Notice Filed by Courtney Hull Filed by on behalf of Texas Comptroller of Public Accounts, Revenue Accounting Division (Hull, Courtney) (Entered: 10/09/2025)
10/09/2025	482 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of October 3, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/09/2025. Estimated completion date: 10/10/2025. Modified on 10/9/2025 (amp4). (Entered: 10/09/2025)
10/09/2025	483 (6 pgs)	Notice *of Filing of Debtors' and Committee's Proposed Confirmation Schedules*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/09/2025)
10/09/2025	484 (19 pgs)	Emergency Motion / *The Official Committee of Unsecured Creditors' Emergency Motion for Entry of an Order (I) Scheduling Certain Dates and Deadlines in connection with Confirmation of the Debtors' Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/09/2025)
10/09/2025	485 (13 pgs)	BNC Certificate of Mailing. (Related document(s):456 Transcript) No. of Notices: 81. Notice Date 10/09/2025. (Admin.) (Entered: 10/09/2025)

10/10/2025	486 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of the Status Conference held on October 10, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Bailey, Kaleb) Electronically forwarded to Judicial Transcribers of Texas on 10/10/2025. Estimated completion date: 10/11/2025. Modified on 10/10/2025 (bow4). (Entered: 10/10/2025)
10/10/2025	487 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 am to 9:00 am. Appearances: see log. Status conference held. Oral argument heard. The confirmation hearing is continued to 12/8/2025 at 9:00 am. ERO: yes. (Related document(s):1 Voluntary Petition (Chapter 11), 445 Amended Chapter 11 Plan) **Confirmation hearing to be held on 12/8/2025 at 09:00 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 10/10/2025)
10/10/2025	488 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by DIP Parties. This is to order a transcript of October 10, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Copy Electronically forwarded to Judicial Transcribers of Texas on 10/10/2025. Estimated completion date: 10/11/2025. Modified on 10/10/2025 (bow4). (Entered: 10/10/2025)
10/10/2025	489 (1 pg)	PDF with attached Audio File. Court Date & Time [10/10/2025 8:30:01 AM]. File Size [14233 KB]. Run Time [00:29:39]. (admin). (Entered: 10/10/2025)
10/10/2025	490 (15 pgs; 3 docs)	Certificate of No Objection *Regarding Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (Filed By ModivCare Inc.). (Related document(s):335 Generic Motion) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 10/10/2025)
10/10/2025	491 (33 pgs; 3 docs)	Certificate of No Objection *Regarding Motion of Debtors for Authority to Retain and Compensate Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):336 Generic Motion) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 10/10/2025)
10/10/2025	492 (15 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 6, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 28 Initial Order Complex Chapter 11, 53 Order on Emergency Motion, 57 Order on Emergency Motion, 58 Order on Emergency Motion, 66 Order on Emergency Motion, 113 Certificate, 128 Certificate, 353 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 10/10/2025)
10/11/2025	493 (11 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Application For Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):338 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)

10/11/2025	494 (11 pgs; 3 docs)	Certificate of No Objection *Regarding Application of Debtors to Employ and Retain Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel For the Debtors and Debtors-In-Possession* (Filed By ModivCare Inc.). (Related document(s):339 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	495 (49 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Application For Entry of an Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):340 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	496 (20 pgs; 3 docs)	Certificate of No Objection *Regarding Application of Debtors For Entry of an Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for the Debtors Effective as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):341 Application to Employ) (Attachments: # 1 Proposed Order # 2 Exhibit (Redline)) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	497 (10 pgs; 2 docs)	Certificate of No Objection *Regarding Debtors' Application For Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors In Possession as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Related document(s):342 Application to Employ) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/11/2025)
10/11/2025	498 (13 pgs)	BNC Certificate of Mailing. (Related document(s):474 Transcript) No. of Notices: 82. Notice Date 10/11/2025. (Admin.) (Entered: 10/11/2025)
10/12/2025	500 (6 pgs)	Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (Related Doc # 335), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	501 (15 pgs)	Order Authorizing Debtors to Retain and Compensate Professionals Used in the Ordinary Course of Business (Related Doc # 336), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	502 (4 pgs)	Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date (Related Doc # 338), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	503 (4 pgs)	Order Authorizing the Employment and Retention of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors and Debtors-in-Possession (Related Doc # 339), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	504 (23 pgs)	Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date (Related Doc # 340), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)

10/12/2025	505 (8 pgs)	Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for Debtors, Effective as of the Petition Date; and (B) Granting Related Relief (Related Doc # 341), Signed on 10/12/2025. (abh4) (Entered: 10/14/2025)
10/12/2025	506 (7 pgs)	Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief (Related Doc 342), Signed on 10/12/2025. (abh4)Modified on 10/14/2025 (abh4). (Entered: 10/14/2025)
10/13/2025	499 (1 pg)	MOTION to Appear Pro Hac Vice for Shawn M. Krogh (Fee Paid: $100, receipt number A26559905) Filed by Creditor AlphaOne Ambulance Medical Services, Inc. (Krogh, Shawn) (Entered: 10/13/2025)
10/13/2025	507 (7 pgs)	Order Authorizing the Debtors to (A) Reject Certain Unexpired Leases and (B) Abandon Certain Remaining Personal Property in Connection Therewith (Related Doc # 337), Signed on 10/13/2025. (abh4) (Entered: 10/14/2025)
10/14/2025	508 (1 pg)	Order Granting Motion for Shawn M. Krogh To Appear pro hac vice (Related Doc # 499) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/14/2025. (abh4) (Entered: 10/14/2025)
10/14/2025	509 (11 pgs; 3 docs)	Notice *of First Modified Ordinary Course Professional Schedule*. (Related document(s):501 Generic Order) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - First Modified Schedule of Debtors' Ordinary Course Professionals # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	510 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Bondurant, Mixson & Elmore, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	511 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Bowles Rice LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	512 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Bradley Arant Boult Cummings LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	513 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of ByrdGomes LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)

10/14/2025	514 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Capital City Consulting, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	515 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Capital Impact Group, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	516 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Centerpoint360, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	517 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Faegre Drinker Biddle & Reath LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	518 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of FTI Consulting, Inc. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	519 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Gaffney, Bennett & Associates Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	520 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Honigman LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	521 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of James Miller & Associates, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	522 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of J.L. Morgan Company, Inc. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	523 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Kelley Consulting LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By

		ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	524 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of KPMG LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	525 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Kramon & Graham, P.A. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	526 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Littler Mendelson P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	527 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Maine Street Solutions Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	528 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of McCall Hamilton Advocacy, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	529 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Mercury Public Affairs LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	530 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of MJ Simon and Company Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Solutions, LLC).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	531 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Nielsen Merksamer, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	532 (6 pgs)	Declaration re: */ Declaration of Disinterestedness of Nixon Peabody LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)

10/14/2025	533 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Polsinelli PC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	534 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of PwC US Business Advisory LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Solutions, LLC).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	535 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Ridge Policy Group LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	536 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Saul Ewing LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	537 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of The Southern Group of South Carolina 2005, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	538 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Verrill Dana LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	539 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Wilcox Savage Consulting, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	540 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Willcox & Savage, P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	541 (4 pgs)	Declaration re: *Declaration of Disinterestedness of Willoughby Humphrey & D'Antoni, P.A. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)

10/14/2025	542 (4 pgs)	Declaration re: *Declaration of Disinterestedness of West Virginia Lobbyist Group, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	543 (9 pgs)	Declaration re: | *Declaration of Chad J. Shandler in Support of the Motion of Debtors For Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):439 Sealed Document, 440 Redacted Document In Advance of Sealed Paper) (Davidson, Timothy) (Entered: 10/14/2025)
10/14/2025	544 (11 pgs; 2 docs)	Motion to Extend Time */ Motion of Debtors for Entry of an Order Extending the Time for Debtors to Update Business Forms* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 10/14/2025)
10/15/2025	545 (26 pgs; 2 docs)	Transcript RE: Status Conference held on October 10, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/13/2026. (mhen) (Entered: 10/15/2025)
10/15/2025	546 (7 pgs)	Stipulation By ModivCare Inc. and The Official Committee of Unsecured Creditors, the Prepetition First Lien Agent, Consenting Creditors, and DIP Lenders. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Related document(s):457 Order Setting Hearing) (Davidson, Timothy) (Entered: 10/15/2025)
10/15/2025	547 (26 pgs; 2 docs)	Transcript RE: Status Conference Hearing (Via Zoom) AMENDED TRANSCRIPT held on October 10, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 01/13/2026. (mhen) (Entered: 10/15/2025)
10/16/2025	548 (7 pgs)	Stipulation and Agreed Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief, Signed on 10/16/2025 (Related document(s):457 Order Setting Hearing, 546 Stipulation) (abh4) (Entered: 10/16/2025)
10/16/2025	549 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 10/16/2025)
10/16/2025	550 (286 pgs; 2 docs)	Amended Disclosure Statement Filed by ModivCare Inc.. (Related document(s):120 Disclosure Statement) (Attachments: # 1 Redline) (Davidson, Timothy) (Entered: 10/16/2025)

10/16/2025	551 (29 pgs; 3 docs)	Notice *of Filing of Updated Disclosure Statement and Solicitation Procedures Order*. (Related document(s):457 Order Setting Hearing, 550 Amended Disclosure Statement) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Updated Solicitation Procedures Order # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 10/16/2025)
10/17/2025	552 (12 pgs)	Amended Order (A) Approving Disclosure Statement; (B) Scheduling Confirmation Hearing; (C) Establishing Related Objection and Voting Deadlines; (D) Approving Related Solicition Procedures, Ballots, and Release Opt-Out Forms 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, Signed on 10/17/2025 (Related document(s):122 Emergency Motion (with hearing date)) (abh4) (Entered: 10/17/2025)
10/17/2025	553 (10 pgs)	Stipulation By ModivCare Inc. and Proposed Lead Plaintiff. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):382 Objection, 409 Generic Motion) (Davidson, Timothy) (Entered: 10/17/2025)
10/17/2025	559 (4 pgs)	Notice *of Lien*. (Related document(s):1 Voluntary Petition (Chapter 11)) Filed by Tammy Jones (cak4) (Entered: 10/20/2025)
10/18/2025	554 (12 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee of the Debtors Effective as of September 15, 2025* (Filed By ModivCare Inc.). (Related document(s):362 Application to Employ) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 10/18/2025)
10/18/2025	555 (13 pgs)	BNC Certificate of Mailing. (Related document(s):545 Transcript) No. of Notices: 83. Notice Date 10/18/2025. (Admin.) (Entered: 10/18/2025)
10/18/2025	556 (13 pgs)	BNC Certificate of Mailing. (Related document(s):547 Transcript) No. of Notices: 83. Notice Date 10/18/2025. (Admin.) (Entered: 10/18/2025)
10/20/2025	557 (10 pgs)	Stipulation and Agreed Order Regarding Proposed Lead Plaintiff Opt-Out of Third Party Release on Behalf of Proposed Class in Securities Litigation, Signed on 10/20/2025 (Related document(s):382 Objection, 409 Generic Motion, 553 Stipulation) (abh4) (Entered: 10/20/2025)
10/20/2025	558 (4 pgs)	Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee as of September 15, 2025 (Related Doc # 362), Signed on 10/20/2025. (abh4) (Entered: 10/20/2025)
10/20/2025	560 (9 pgs)	Certificate *of Service re: 1) Declaration of Chad J. Shandler in Support of the Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; 2) Motion of Debtors for Entry of an Order Extending the Time for Debtors to Update Business Forms; 3) Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; and 4) Debtors Motion to Seal Exhibit to Motion of Debtors for Entry of an*

		Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):440 Redacted Document In Advance of Sealed Paper, 441 Motion to Seal, 543 Declaration, 544 Motion to Extend Time) (Gershbein, Evan) (Entered: 10/20/2025)
10/21/2025	561 (2 pgs)	Notice of Appearance and Request for Notice Filed by Tammy Jones (amp4) (Entered: 10/21/2025)
10/21/2025	562 (10 pgs)	Proposed Order RE: *[Revised] Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):472 Application to Employ) (Pesce, Gregory) (Entered: 10/21/2025)
10/21/2025	563 (5 pgs; 2 docs)	Motion to Extend Time *to File Proof of Claims* Filed by Interested Party Peggy Aaron (Attachments: # 1 Proof of Claims) (bow4) (Entered: 10/21/2025)
10/21/2025	564 (13 pgs)	Certificate *of Service re: Documents Served on October 14, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):500 Generic Order, 501 Generic Order, 502 Order on Application to Employ, 503 Order on Application to Employ, 504 Order on Application to Employ, 505 Order on Application to Employ, 506 Order on Application to Employ, 507 Order on Motion to Reject Lease or Executory Contract, 509 Notice) (Gershbein, Evan) (Entered: 10/21/2025)
10/21/2025	565 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order (I) Scheduling Certain Dates and Deadlines in Connection with Confirmation of the Debtors Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):548 Generic Order) (Gershbein, Evan) (Entered: 10/21/2025)
10/21/2025	566 (8 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Regarding Proposed Lead Plaintiff Opt-Out of Third-Party Release on Behalf of Proposed Class in Securities Litigation; and 2) Order Authorizing the Employment and Retention of Quinn Emanuel Urquhart & Sullivan LLP as Counsel to the Special Committee as of September 15, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):557 Generic Order, 558 Order on Application to Employ) (Gershbein, Evan) (Entered: 10/21/2025)
10/21/2025	567 (64 pgs; 4 docs)	Application to Employ Cresa, LLC as Real Estate Consultant and Advisor. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A - Services Agreement # 2 Exhibit B - Gregg Declaration # 3 Proposed Order) (Davidson, Timothy) (Entered: 10/21/2025)
10/22/2025	568 (3 pgs)	US Trustee's Notice *of Reconstitution of the Official Committee of Unsecured Creditors (to reflect resignation of Member Randstad North America from Committee)*. (Whitworth, Jana) (Entered: 10/22/2025)

10/22/2025	569 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Hinman Straub Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/22/2025)
10/23/2025	570 (9 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):471 Motion for Relief From Stay) (Davidson, Timothy) (Entered: 10/23/2025)
10/24/2025	571 (1 pg)	MOTION to Appear Pro Hac Vice for Donovan Jones (Fee Paid: $100, receipt number A26599718) Filed by Creditor Seini Ika (Jones, Donovan) (Entered: 10/24/2025)
10/24/2025	572 (3 pgs)	Notice of Appearance and Request for Notice Filed by Craig Andrew Stanfield Filed by on behalf of First Lien Agent, Consenting Creditors, and DIP Lenders (Stanfield, Craig) (Entered: 10/24/2025)
10/24/2025	573 (8 pgs)	Certificate *of Service re: Application of Debtors for Entry of an Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors-in-Possession as of the Petition Date* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):567 Application to Employ) (Gershbein, Evan) (Entered: 10/24/2025)
10/24/2025	574 (51 pgs; 4 docs)	Application to Employ Mills Halstead Zaloudek, LLC as Real Estate Counsel. Objections/Request for Hearing Due in 21 days. Filed by Debtor ModivCare Inc. (Attachments: # 1 Exhibit A - Halstead Declaration # 2 Exhibit B - Retention Declaration # 3 Proposed Order) (Davidson, Timothy) (Entered: 10/24/2025)
10/25/2025	575 (16 pgs)	BNC Certificate of Mailing. (Related document(s):568 US Trustee's Notice) No. of Notices: 102. Notice Date 10/25/2025. (Admin.) (Entered: 10/25/2025)
10/27/2025	576 (9 pgs)	Objection */ The Official Committee of Unsecured Creditors' Preliminary Objection to the Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and among the Debtors and UHC and (B) Granting Related Relief [Related Docket No. 439]*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 10/27/2025)
10/27/2025	577 (1 pg)	Order Granting Motion for Donovan C. Jones To Appear pro hac vice (Related Doc # 571) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 10/27/2025. (abh4) (Entered: 10/27/2025)
10/27/2025	578 (1 pg)	Order Granting Motion to Withdraw Appearance (Related Doc # 425), Signed on 10/27/2025. (abh4) (Entered: 10/27/2025)
10/27/2025	579 (2 pgs)	Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code (Related Doc # 412), Signed on 10/27/2025. (abh4) (Entered: 10/27/2025)
10/27/2025	580 (3 pgs)	Notice *of Hearing to Be Held on October 30, 2025, at 1:00 p.m. (prevailing Central Time)*. (Related document(s):439 Sealed Document,

		440 Redacted Document In Advance of Sealed Paper, 576 Objection) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/27/2025)
10/27/2025	581 (5 pgs; 2 docs)	Motion to Continue Hearing On (related document(s):471 Motion for Relief From Stay, 570 Response). Filed by Creditor Thresa Lyons Hearing scheduled for 10/30/2025 at 11:00 AM. (Attachments: # 1 Proposed Order) (Norwood, Bach) (Entered: 10/27/2025)
10/28/2025	582 (1 pg)	Order Granting Agreed Motion to Continue Hearing on Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors (Related Doc # 581), Signed on 10/28/2025. **Hearing scheduled for 11/18/2025 at 11:00 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 10/28/2025)
10/28/2025	583 (2 pgs)	Order Granting Debtors' Motion to Seal Exhibit to Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief (Related Doc # 441), Signed on 10/28/2025. (abh4) (Entered: 10/28/2025)
10/28/2025	584 (244 pgs; 4 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 [Filed Under Seal] # 2 Exhibit 2 # 3 Exhibit 3) (Koster, Charles) (Entered: 10/28/2025)
10/28/2025	585	Sealed Document */ Exhibit 1 to the Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled for October 30, 2025, at 11:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 10/28/2025)
10/28/2025	586	Sealed Document , Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7) (Davidson, Timothy) (Entered: 10/28/2025)
10/28/2025	587 (23 pgs; 8 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):586 Sealed Document, Witness List, Exhibit List) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 (Filed Under Seal) # 4 Exhibit 4 (Filed Under Seal) # 5 Exhibit 5 (Filed Under Seal) # 6 Exhibit 6 (Filed Under Seal) # 7 Exhibit 7 (Filed Under Seal)) (Davidson, Timothy) (Entered: 10/28/2025)
10/28/2025	588 (25 pgs)	Declaration re: */ Declaration of Disinterestedness of Baker & Hostetler LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/28/2025)
10/28/2025	589 (7 pgs)	Statement *of Consenting Creditors with Respect to the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders).(Related document(s):472 Application to Employ) (Warren, Matthew) (Entered: 10/28/2025)

10/29/2025	590 (3 pgs)	Notice *of Class Opt-Out*. (Related document(s):557 Generic Order) Filed by Lead Plaintiff Christopher Skrypski (Behlmann, Andrew) (Entered: 10/29/2025)
10/29/2025	591 (3 pgs)	Notice *of Intent to Adduce Testimony From a Remote Location By Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/29/2025)
10/29/2025	592 (2 pgs)	Certificate *of Service* (Filed By Lead Plaintiff Christopher Skrypski). (Related document(s):590 Notice) (Behlmann, Andrew) (Entered: 10/29/2025)
10/29/2025	593 (4 pgs)	Declaration re: */ Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):472 Application to Employ, 562 Proposed Order) (Pesce, Gregory) (Entered: 10/29/2025)
10/29/2025		Hearing Set On (Related document(s):440 Redacted Document In Advance of Sealed Paper) **Hearing scheduled for 10/30/2025 at 01:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 10/29/2025)
10/29/2025	594 (7 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):439 Sealed Document, 576 Objection) (Davidson, Timothy) (Entered: 10/29/2025)
10/29/2025	595 (4 pgs)	Agenda for Hearing on 10/30/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 10/29/2025)
10/29/2025	596 (9 pgs; 5 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors).(Related document(s):584 Witness List, Exhibit List, 585 Sealed Document) (Attachments: # 1 Exhibit 4 [Filed Under Seal] # 2 Exhibit 5 [Filed Under Seal] # 3 Exhibit 6 [Filed Under Seal] # 4 Exhibit 7 [Filed Under Seal]) (Koster, Charles) (Entered: 10/29/2025)
10/29/2025	597	Sealed Document */ The Official Committee of Unsecured Creditors' Amended Witness and Exhibit List for the Hearing Scheduled for October 30, 2025, at 1:00 P.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 4 # 2 Exhibit 5 # 3 Exhibit 6 # 4 Exhibit 7) (Koster, Charles) (Entered: 10/29/2025)
10/29/2025	598 (12 pgs)	Certificate *of Service re: Debtors' Objection to Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):570 Response) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	599 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Stevens & Lee, P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 10/29/2025)

10/29/2025	600 (11 pgs)	Certificate *of Service re: 1) Order Granting Debtors' Motion to Seal Exhibit to Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; and 2) Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):583 Order on Motion to Seal, 587 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	601 (9 pgs)	Certificate *of Service re: 1) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology; 2) Debtors Reply in Support of Their Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief; and 3) Agenda of Debtors for Matters Set for Hearing on October 30, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):591 Notice, 594 Response, 595 Agenda) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	602 (20 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 15, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 128 Certificate, 353 Certificate, 354 Certificate) (Gershbein, Evan) (Entered: 10/29/2025)
10/29/2025	603 (9 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 21, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 10/29/2025)
10/30/2025	604 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 10/30/2025)
10/30/2025	605 (334 pgs)	Notice *of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 10/30/2025)
10/30/2025	606 (1 pg)	Courtroom Minutes. Time Hearing Held: 1:00 pm to 2:28 pm; 2:50 pm to 3:51 pm. Appearances: see log. Sworn and testified witness: Chad Shandler. Admitted exhibits: ECF Nos. 587-1 through 587-7/586-1 through 586-7 (sealed) ; 587-2/586-2 (sealed) is admitted as direct testimony subject to cross examination; 596-1 through 596-7. Judicial notice taken of binder exhibit 7-11 presented by Christopher Shore for the Official Committee of Unsecured Creditors. Motion hearing held. Oral argument heard. Motion 440 is granted for reasons stated on the record. Mr. Shore is to e-mail the exhibits as stated on the record. Debtor is to submit a proposed order ERO: yes. (Related document(s):440 Redacted Document In Advance of Sealed Paper) (abh4)Modified on 10/30/2025 (abh4).Modified on 10/31/2025 (abh4). (Entered: 10/30/2025)
10/30/2025	607 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by DIP Lenders. This is to order a transcript of October 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Electronically forwarded to Judicial Transcribers of

		Texas on 10/31/2025. Estimated completion date: 11/1/2025. Modified on 10/31/2025 (smg4). (Entered: 10/30/2025)
10/30/2025	608 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by ModivCare Inc. This is to order a transcript of Hearing held on October 30, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By ModivCare Inc.). (Davidson, Timothy) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/31/2025. Estimated completion date: 11/01/2025. Modified on 10/31/2025 (smg4). (Entered: 10/30/2025)
10/30/2025	609 (8 pgs; 2 docs)	Certificate of No Objection *to the Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):472 Application to Employ) (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 10/30/2025)
10/30/2025	610 (1 pg)	PDF with attached Audio File. Court Date & Time [10/30/2025 1:00:08 PM]. File Size [41577 KB]. Run Time [01:26:37]. (admin). (Entered: 10/30/2025)
10/30/2025	611 (1 pg)	PDF with attached Audio File. Court Date & Time [10/30/2025 2:50:26 PM]. File Size [28640 KB]. Run Time [00:59:40]. (admin). (Entered: 10/30/2025)
10/30/2025	612 (9 pgs)	Certificate *of Service re: 1) Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025; 2) Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code; and 3) Notice of Hearing to be Held on October 30, 2025, at 1:00 pm (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):574 Application to Employ, 579 Order on Motion to Extend Time, 580 Notice) (Gershbein, Evan) (Entered: 10/30/2025)
10/30/2025	615 (9 pgs)	Order Granting Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief, Signed on 10/30/2025 (Related document(s):439 Sealed Document, 440 Redacted Document In Advance of Sealed Paper) (abh4) (Entered: 10/31/2025)
10/30/2025	657 (6 pgs; 2 docs)	Motion for Relief from Stay . Receipt Number O, Fee Amount $199. Filed by Creditor Lisa Sallaj (amp4) (Entered: 11/04/2025)
10/30/2025	658 (20 pgs)	Exhibits by Lisa Sallaj (amp4) (Entered: 11/04/2025)
10/30/2025	659 (3 pgs)	Notice of Appearance and Request for Notice Filed by Lisa Sallaj (amp4) (Entered: 11/04/2025)
10/30/2025	663 (5 pgs)	Application *to Proceed without Payment* Filed by Creditor Lisa Sallaj (dah4) (Entered: 11/05/2025)

10/31/2025	613 (2 pgs)	Notice *of Continued Hearing to Be Held on November 18, 2025 at 11:00 a.m. CST*. (Related document(s):471 Motion for Relief From Stay) Filed by Thresa Lyons (Norwood, Bach) (Entered: 10/31/2025)
10/31/2025	614 (1 pg)	MOTION to Appear Pro Hac Vice for Ashley Chase (Fee Paid: $100, receipt number A26618054) Filed by Creditor Committee Official Committee Of Unsecured Creditors (Chase, Ashley) (Entered: 10/31/2025)
10/31/2025	616 (4 pgs)	Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025 (Related Doc # 472), Signed on 10/31/2025. (abh4) (Entered: 10/31/2025)
10/31/2025	617 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the October 30, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas on 10/31/2025. Estimated completion date: 11/01/2025. Modified on 10/31/2025 (smg4). (Entered: 10/31/2025)
10/31/2025	618 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $12023105 disbursed (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	619 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $1267171 disbursed (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	620 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $4564984 disbursed (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	621 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $232052384 disbursed (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	622 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $68848132 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	623 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	624 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	625 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 10/31/2025)

10/31/2025	626 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	627 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	628 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	629 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	630 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	631 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	632 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	633 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	634 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	635 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	636 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	637 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	638 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	639 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 10/31/2025)

10/31/2025	640 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
10/31/2025	641 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 9/30/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 10/31/2025)
11/03/2025	642 (1 pg)	Order Granting Motion for Ashley Chase To Appear pro hac vice (Related Doc # 614) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/3/2025. (abh4) (Entered: 11/03/2025)
11/03/2025	643 (3 pgs)	Declaration re: */ Supplemental Declaration of David MacGreevey of AlixPartners, LLP* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):473 Application to Employ) (Koster, Charles) (Entered: 11/03/2025)
11/03/2025	644 (5 pgs)	Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025 (Related Doc # 473) Signed on 11/3/2025. (abh4) (Entered: 11/03/2025)
11/03/2025	645 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Anderson Richard Consulting, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/03/2025)
11/03/2025	646 (2 pgs)	Notice of Appearance and Request for Notice Filed by Phillip John Conley Filed by on behalf of Lifestar Response of Maryland, Inc., Keystone Quality Transport (Conley, Phillip) (Entered: 11/03/2025)
11/03/2025	647 (108 pgs; 2 docs)	Transcript RE: Motion to Extend Exclusivity held on October 30, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 02/2/2026. (mhen) (Entered: 11/03/2025)
11/03/2025	648 (32 pgs; 3 docs)	Objection *(Limited) to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases*. Filed by Keystone Quality Transport, Lifestar Response of Maryland, Inc. (Attachments: # 1 Exhibit A # 2 Exhibit B) (Conley, Phillip) (Entered: 11/03/2025)
11/03/2025	649 (2 pgs)	Certificate *of Service to Limited Objection to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases* (Filed By Keystone Quality Transport, Lifestar Response of Maryland, Inc.). (Conley, Phillip) (Entered: 11/03/2025)
11/03/2025	650 (17 pgs; 3 docs)	Agreed Order and Certificate of Counsel (Filed By Official Committee Of Unsecured Creditors).(Related document(s):473 Application to Employ) (Attachments: # 1 Proposed Order # 2 Redline) (Koster, Charles) (Entered: 11/03/2025)

11/03/2025	651 (3 pgs)	Affidavit Re: *Publication of the Notice of (I) Confirmation Hearing on Joint Chpater 11 Plan and Related Matters and (II) Objection Deadline in The New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):552 Generic Order) (Gershbein, Evan) (Entered: 11/03/2025)
11/03/2025	652 (108 pgs; 2 docs)	Transcript RE: 9019 Motion Hearing (AMENDED TRANSCRIPT) held on October 30, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 02/2/2026. (mhen) (Entered: 11/03/2025)
11/03/2025	653 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Castleberry Law Firm, PLLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/03/2025)
11/04/2025	654 (6 pgs)	Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025, Signed on 11/4/2025 (Related document(s):473 Application to Employ, 650 Agreed Order and Certificate of Counsel) (abh4) (Entered: 11/04/2025)
11/04/2025	655 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Amber Integrated, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/04/2025	656 (4 pgs)	Letter from Amy Sandoval (dmm4) (Entered: 11/04/2025)
11/04/2025	660	Sealed Motion */ Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/04/2025	661 (13 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/04/2025	662 (8 pgs; 2 docs)	Motion to Seal */ Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/04/2025)
11/05/2025	664 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Derrryberry & Niafeh, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of*

		Business (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/05/2025)
11/05/2025	665 (1 pg)	MOTION to Appear Pro Hac Vice for Donna M. Brewer (Fee Paid: $100, receipt number A26634521) Filed by Creditor City of Boston (Brewer, Donna) (Entered: 11/05/2025)
11/05/2025	666 (70 pgs)	Statement */ First Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through September 30, 2025* (Filed By AlixPartners, LLP). (Koster, Charles) (Entered: 11/05/2025)
11/05/2025	667 (8 pgs)	Certificate *of Service re: Order Granting Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement by and Among the Debtors and UHC and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):615 Generic Order) (Gershbein, Evan) (Entered: 11/05/2025)
11/05/2025	668 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before October 28, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 11/05/2025)
11/06/2025	669 (1 pg)	Order Granting Motion for Donna M. Brewer To Appear pro hac vice (Related Doc # 665) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/6/2025. (abh4) (Entered: 11/06/2025)
11/06/2025	670 (11 pgs; 2 docs)	Objection to Claim Number by Claimant */ Debtors' Omnibus Objection to Certain Proofs of Claim* (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/06/2025)
11/06/2025	671 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Manatt, Phelps & Phillips, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/06/2025)
11/06/2025	672 (2 pgs)	Notice of Appearance and Request for Notice Filed by Phillip John Conley Filed by on behalf of Northeast Treatment Centers (Conley, Phillip) (Entered: 11/06/2025)
11/06/2025	673 (12 pgs; 3 docs)	Objection *(Limited) to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases*. Filed by Northeast Treatment Centers (Attachments: # 1 Exhibit A # 2 Exhibit B) (Conley, Phillip) (Entered: 11/06/2025)
11/06/2025	674 (2 pgs)	Certificate *of Service to Limited Objection to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases* (Filed By Northeast Treatment Centers). (Conley, Phillip) (Entered: 11/06/2025)

11/06/2025	675 (14 pgs)	BNC Certificate of Mailing. (Related document(s):647 Transcript) No. of Notices: 84. Notice Date 11/06/2025. (Admin.) (Entered: 11/06/2025)
11/06/2025	676 (14 pgs)	BNC Certificate of Mailing. (Related document(s):652 Transcript) No. of Notices: 84. Notice Date 11/06/2025. (Admin.) (Entered: 11/06/2025)
11/07/2025	677 (5 pgs; 2 docs)	Certificate of No Objection *Regarding Motion of Debtors for Entry of an Order Extending the Time for Debtors to Update Business Forms* (Filed By ModivCare Inc.).(Related document(s):544 Motion to Extend Time) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	678 (4 pgs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors).(Related document(s):548 Generic Order) (Koster, Charles) (Entered: 11/07/2025)
11/07/2025	679 (4 pgs)	Witness List (Filed By ModivCare Inc.).(Related document(s):548 Generic Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	680 (4 pgs)	Witness List (Filed By Official Committee Of Unsecured Creditors). (Related document(s):548 Generic Order) (Koster, Charles) (Entered: 11/07/2025)
11/07/2025	681 (2 pgs)	Witness List (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) (Entered: 11/07/2025)
11/07/2025	682 (11 pgs)	Declaration re: */ Declaration of Disinterestedness of Gibson, Dunn & Crutcher LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	683 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Perry Jacobson Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/07/2025)
11/07/2025	684 (64 pgs)	Statement */ White & Case LLP's First Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and including September 30, 2025* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 11/07/2025)
11/10/2025	685 (2 pgs)	Order Extending the Time for Debtors to Update Business Forms (Related Doc # 544), Signed on 11/10/2025. (abh4) (Entered: 11/10/2025)
11/10/2025	686 (2 pgs)	Witness List (Filed By Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties). (Bressler, Gary) (Entered: 11/10/2025)

11/10/2025	687 (18 pgs)	Declaration re: *of Daniel B. Silvers, Investigating Director of Modivcare Inc., in Support of Joint Chapter 11 Plan of Reorganization of Modivcare Inc. and its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):483 Notice) (Kelly, Cameron) (Entered: 11/10/2025)
11/10/2025	688 (8 pgs)	Certificate *of Service re: 1) Debtors Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief; and 2) Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):661 Generic Motion, 662 Motion to Seal) (Gershbein, Evan) (Entered: 11/10/2025)
11/11/2025	689 (12 pgs)	Certificate *of Service re: Debtors' Omnibus Objection to Certain Proofs of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):670 Objection to Claim) (Gershbein, Evan) (Entered: 11/11/2025)
11/12/2025	690 (39 pgs; 3 docs)	Objection *to Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases (Doc. 605)*. Filed by Automotive Rentals, Inc. and ARI Fleet LT (Attachments: # 1 Exhibit 1 - Master Services Agreement # 2 Exhibit 2 - Guaranty) (Chaney, Mark) (Entered: 11/12/2025)
11/12/2025	691 (1 pg)	MOTION to Appear Pro Hac Vice for Roger J. Harrington, Jr. (Fee Paid: $100, receipt number A26652866) Filed by Creditor Sarah Car Care, Inc (Harrington, Roger) (Entered: 11/12/2025)
11/12/2025	692 (1 pg)	MOTION to Appear Pro Hac Vice for Anthony J. Kudron (Fee Paid: $100, receipt number A26653769) Filed by Creditor Humana Inc., Humana Insurance Company, and their affiliates (Kudron, Anthony) (Entered: 11/12/2025)
11/12/2025	693 (11 pgs; 3 docs)	Notice *of Second Modified Ordinary Course Professional Schedule*. (Related document(s):501 Generic Order) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Second Modified Schedule of Debtors' Ordinary Course Professionals # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	694 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Balch & Bingham, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	695 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Gordon Rees Scully Mansukhani, LLP Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	696 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Underwood Law Firm, P.C. Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed

		By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	697 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of Hinman Straub PC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/12/2025)
11/12/2025	698 (8 pgs)	Certificate *of Service re: Debtors Preliminary Witness List for the Confirmation Hearing* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):679 Witness List) (Gershbein, Evan) (Entered: 11/12/2025)
11/12/2025	699 (8 pgs)	Certificate *of Service re: Order Extending the Time for Debtors to Update Business Forms* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):685 Order on Motion to Extend Time) (Gershbein, Evan) (Entered: 11/12/2025)
11/12/2025	700 (10 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 5, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 128 Certificate, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 11/12/2025)
11/13/2025	701 (1 pg)	Order Granting Motion for Roger J. Harrington, Jr. To Appear pro hac vice (Related Doc # 691) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/13/2025. (abh4) (Entered: 11/13/2025)
11/13/2025	702 (1 pg)	Order Granting Motion for Anthony J. Kudron To Appear pro hac vice (Related Doc # 692) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/13/2025. (abh4) (Entered: 11/13/2025)
11/13/2025	703 (9 pgs; 2 docs)	Certificate of No Objection *Regarding Application of Debtors for Entry of an Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors in Possession as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):567 Application to Employ) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	704 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 11/13/2025)
11/13/2025	705 (4 pgs)	Notice of Appearance and Request for Notice Filed by Worthy W. Walker Filed by on behalf of Endurance American Specialty Insurance Company (Walker, Worthy) (Entered: 11/13/2025)
11/13/2025	706 (4 pgs)	Notice of Appearance and Request for Notice Filed by Worthy W. Walker Filed by on behalf of CNC-Access, Inc. a/k/a Community Alternatives Virginia, Inc. (Walker, Worthy) (Entered: 11/13/2025)

11/13/2025	707 (6 pgs)	Objection *to Notice of Potential Assumption*. Filed by Endurance American Specialty Insurance Company (Walker, Worthy) (Entered: 11/13/2025)
11/13/2025	708 (11 pgs)	Objection *to Notice of Potential Assumption*. Filed by CNC-Access, Inc. a/k/a Community Alternatives Virginia, Inc. (Walker, Worthy) (Entered: 11/13/2025)
11/13/2025		Hearing Continued by Agreement (Related document(s):471 Motion for Relief From Stay) Parties contacted the Case Manager. **Hearing scheduled for 12/4/2025 at 10:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/13/2025)
11/13/2025	709 (1 pg)	MOTION to Appear Pro Hac Vice for Gary F. Torrell (Fee Paid: $100, receipt number 26657195) Filed by Creditors Covalent Health, PRN Ambulance, LLC, Protransport-1, LLC (Torrell, Gary) (Entered: 11/13/2025)
11/13/2025	710 (1 pg)	MOTION to Appear Pro Hac Vice for Thomas B. Helbig, Jr. (Fee Paid: $100, receipt number A26658657) Filed by Creditor Sarah Car Care, Inc (Helbig, Thomas) (Entered: 11/13/2025)
11/13/2025	711 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on November 10, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):2 Designation of Complex Chapter 11 Bankruptcy Case, 28 Initial Order Complex Chapter 11, 58 Order on Emergency Motion, 113 Certificate, 128 Certificate, 352 Certificate, 394 Generic Order, 443 Certificate, 507 Order on Motion to Reject Lease or Executory Contract, 564 Certificate) (Gershbein, Evan) (Entered: 11/13/2025)
11/13/2025	712 (11 pgs; 3 docs)	Notice *of Third Modified Ordinary Course Professional Schedule*. (Related document(s):501 Generic Order) Filed by ModivCare Inc. (Attachments: # 1 Exhibit A - Third Modified Schedule of Debtors' Ordinary Course Professionals # 2 Exhibit B - Redline) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	713 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of the Montana Group, LTD Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	714 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of ZarleyConley PLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/13/2025)
11/13/2025	715 (3 pgs)	Declaration re: */ Declaration of Disinterestedness of The Health Group, LLC Pursuant to Order Authorizing the Retention and Compensation of Certain Professionals Used in the Ordinary Course of Business* (Filed By ModivCare Inc.).(Related document(s):501 Generic Order) (Davidson, Timothy) (Entered: 11/13/2025)

11/14/2025	716 (6 pgs)	Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors in Possession as of the Petition Date (Related Doc # 567), Signed on 11/14/2025. (abh4) (Entered: 11/14/2025)
11/14/2025	717 (1 pg)	Order Granting Motion for Gary F. Torrell To Appear pro hac vice (Related Doc # 709) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/14/2025. (abh4) (Entered: 11/14/2025)
11/14/2025	718 (1 pg)	Order Granting Motion for Thomas B. Helbig, Jr. To Appear pro hac vice (Related Doc # 710) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/14/2025. (abh4) (Entered: 11/14/2025)
11/14/2025	719 (46 pgs; 4 docs)	Objection *(Limited) To Debtors Notice Of Potential Assumption Of Certain Executory Contracts And Unexpired Leases*. Filed by Sarah Car Care, Inc (Attachments: # 1 Exhibit 1 (2016 Agreement) # 2 Exhibit 2 (MATP Agreement) # 3 Exhibit 3 (Proof of Claim)) (Harrington, Roger) (Entered: 11/14/2025)
11/14/2025	720 (2 pgs)	Certificate *of Service to (Limited) Objection to Debtors Notice Of Potential Assumption Of Certain Executory Contracts And Unexpired Leases* (Filed By Sarah Car Care, Inc).(Related document(s):719 Objection) (Harrington, Roger) (Entered: 11/14/2025)
11/14/2025	721 (10 pgs)	Limited Objection *of Counterparties to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases and Cure Amounts*. Filed by PRN Ambulance, LLC, Protransport-1, LLC (Torrell, Gary)Modified on 11/14/2025 (jm4). (Entered: 11/14/2025)
11/14/2025	722 (10 pgs; 2 docs)	Motion to Extend Time */ Debtors' Motion for Entry of an Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/14/2025)
11/14/2025	723 (69 pgs)	Notice *of Friendly Medical Transportation's Limited Objection to Debtors' Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases*. (Related document(s):605 Notice) Filed by Friendly Medical Transportation (McKay, Zachary) (Entered: 11/14/2025)
11/14/2025	724 (83 pgs)	Notice *of MedEx Medical Transport Services, Inc.'s Limited Objection to Debtors' Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases*. (Related document(s):605 Notice) Filed by MedEx Medical Transport Services, Inc. (McKay, Zachary) (Entered: 11/14/2025)
11/14/2025	725 (390 pgs)	Notice *of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):465 Amended Chapter 11 Plan, 550 Amended Disclosure Statement) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/14/2025)
11/14/2025	726 (3 pgs)	Certificate *of Service (Supplemental) re: Interim Order (A) Authorizing Debtors to Pay Prepetition Trade Claims in the Ordinary Course of*

		Business, and (B) Granting Related Relief (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):128 Certificate) (Gershbein, Evan) (Entered: 11/14/2025)
11/14/2025	727 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 12, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 394 Generic Order, 443 Certificate) (Gershbein, Evan) (Entered: 11/14/2025)
11/14/2025	728	Sealed Motion / *Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Attachments: # 1 Proposed Order # 2 Exhibit B - Proposed Complaint) (Koster, Charles) (Entered: 11/14/2025)
11/14/2025	729	Sealed Document / *Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) For (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Proposed Order # 2 Exhibit B - Proposed Complaint) (Koster, Charles) (Entered: 11/14/2025)
11/15/2025	730 (7 pgs; 2 docs)	Certificate of No Objection *Regarding Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025* (Filed By ModivCare Inc.).(Related document(s):574 Application to Employ) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/15/2025)
11/17/2025	731 (7 pgs)	Response (Filed By The Chubb Companies). (Weideman, Corey) (Entered: 11/17/2025)
11/17/2025	732 (101 pgs)	Motion / *REDACTED Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/17/2025)
11/17/2025	733 (81 pgs)	Motion / *REDACTED Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/17/2025)
11/17/2025	734 (4 pgs)	Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025 (Related Doc # 574) Signed on 11/17/2025. (tjl4) (Entered: 11/17/2025)
11/17/2025	735 (2 pgs)	Notice of Appearance and Request for Notice Filed by Phillip John Conley Filed by on behalf of Administrative Services Cooperative, Inc. (Conley,

		Phillip) (Entered: 11/17/2025)
11/17/2025	736 (27 pgs; 2 docs)	Objection *to Debtors' "Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases" Doc 605*. Filed by Administrative Services Cooperative, Inc. (Attachments: # 1 Exhibit Declaration with Exhibit 1) (Conley, Phillip) (Entered: 11/17/2025)
11/17/2025	737 (2 pgs)	Certificate *of Service to Objection to Debtors' "Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases" (Doc 605)* (Filed By Administrative Services Cooperative, Inc.). (Conley, Phillip) (Entered: 11/17/2025)
11/17/2025		Hearing Set by Request (Related document(s):445 Amended Chapter 11 Plan) Contacted by Catherin Rankin. Movant to notice all interested parties and file a certificate of service with the court. **Discovery Status Conference scheduled for 11/18/2025 at 08:00 AM at telephone and video conference only. Pretrial conference to be held on 11/21/2025 at 02:00 PM at telephone and video conference only.** (tjl4)Modified on 11/17/2025 (tjl4). (Entered: 11/17/2025)
11/17/2025	738 (11 pgs; 2 docs)	Response */Objection and Reservation of Rights To Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases (D.I. 605)*. Filed by CPC Management, Inc. d/b/a Germantown Cab Company (Attachments: # 1 Exhibit 1) (Monsour, Trey) (Entered: 11/17/2025)
11/17/2025	739 (1 pg)	MOTION to Appear Pro Hac Vice for Martha B. Chovanes (Fee Paid: $100, receipt number A26666271) Filed by Creditor CPC Management, Inc. d/b/a Germantown Cab Company (Monsour, Trey) (Entered: 11/17/2025)
11/17/2025	740 (1 pg)	Order Setting Hearing, Signed on 11/17/2025 (Related document(s):563 Motion to Extend Time) **Hearing scheduled for 12/11/2025 at 11:45 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/17/2025)
11/17/2025	741 (9 pgs)	*Withdrawn* First Objection *LIMITED OBJECTION AND RESERVATION OF RIGHTS OF HEXAWARE TECHNOLOGIES LIMITED TO THE NOTICE OF POTENTIAL ASSUMPTION OF CERTAIN OF DEBTORS EXECUTORY CONTRACTS AND UNEXPIRED LEASES*. Filed by Hexaware Technologies Limited (Billingsley, James)Modified on 12/17/2025 (abh4). (Entered: 11/17/2025)
11/17/2025	742 (3 pgs)	OBJECTION to Notice of Potential Assumption of Executory Contract and Cure Amount by American Professional Ambulance (dah4) (Entered: 11/17/2025)
11/17/2025	743 (8 pgs; 2 docs)	*Withdrawn* Objection *Genesys Cloud Services Inc. Objection To Notice Of Potential Assumption Of Certain Of Debtors' Executory Contracts And Unexpired Leases*. Filed by Genesys Cloud Services Inc (Attachments: # 1 Certificate of Service) (Rieger, Shannon)Modified on 2/18/2026 (abh4). (Entered: 11/17/2025)
11/17/2025		*Notice of Cancellation of Hearing.* The discovery status conference previously scheduled for 11/18/25 at 8:00 am is *canceled* by request. Contacted by Catherine Rankin. (tjl4) (Entered: 11/17/2025)

11/17/2025	744 (8 pgs)	Certificate *of Service re: Notice of Second Modified Ordinary Course Professional Schedule* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):693 Notice) (Gershbein, Evan) (Entered: 11/17/2025)
11/17/2025	745 (9 pgs; 2 docs)	Motion *of Debtors for Entry of an Order Further Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/17/2025)
11/17/2025	747 (7 pgs)	Limited Objection by The Ronald McDonald House Entities (Related document(s):605 Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases (th4) (Entered: 11/18/2025)
11/18/2025	746 (1 pg)	Order Granting Motion for Martha B. Chovanes To Appear pro hac vice (Related Doc # 739) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/18/2025. (tjl4) (Entered: 11/18/2025)
11/18/2025	748 (424 pgs)	Certificate *of Service re: Notice of Potential Assumption of Certain of Debtors Executory Contracts and Unexpired Leases* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):605 Notice) (Gershbein, Evan) (Entered: 11/18/2025)
11/18/2025	750 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by McDowell County Rescue Squad and Ambulance (Related document(s):605 Notice) (bow4) (Entered: 11/19/2025)
11/18/2025	751 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Providence Transportation Inc (Related document(s):605 Notice) (bow4) (Entered: 11/19/2025)
11/18/2025	754 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party American Legion Ambulance (dah4) (Entered: 11/20/2025)
11/18/2025	755 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Alleghany County EMS (dah4) (Entered: 11/20/2025)
11/18/2025	756 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Parties Caldwell County Ambulance (cak4) (Entered: 11/20/2025)
11/18/2025	757 (2 pgs)	Objection *to Potential Assumption of Contract and Proposed Cure Amount (Related document(s): 605 Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases.)*. Filed by McDowell County Rescue Squad and Ambulance (anc4) (Entered: 11/20/2025)

11/18/2025	758 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Caldwell County Ambulance 605 (cak4) (Entered: 11/20/2025)
11/18/2025	759 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Catawba County EMS (cak4) (Entered: 11/20/2025)
11/18/2025	760 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Wake County EMS (mew4) (Entered: 11/20/2025)
11/18/2025	761 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Interested Party McDowell County Rescue Squad and Ambulance (anc4) (Entered: 11/20/2025)
11/18/2025	762 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Gaston County Emergency Medical Services (cak4) (Entered: 11/20/2025)
11/18/2025	763 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by LifeStar Emergency Services. (Related document(s):605 Notice) (anc4)Modified on 11/21/2025 (anc4). (Entered: 11/20/2025)
11/18/2025	764 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Lifestar Response of Maryland, Inc. (anc4) (Entered: 11/20/2025)
11/18/2025	765 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Providence Transportation Inc (mew4) (Entered: 11/20/2025)
11/18/2025	766 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Henderson County Rescue Squad (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	767 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Jackson County Fire Rescue (cak4) (Entered: 11/20/2025)
11/18/2025	768 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party On Time Ambulance (mew4) (Entered: 11/20/2025)
11/18/2025	769 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Henderson County Rescue Squad (anc4) (Entered: 11/20/2025)

11/18/2025	770 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Columbus Transport Inc (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	771 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Columbus Transport Inc (anc4) (Entered: 11/20/2025)
11/18/2025	772 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party KIWI Emergency Medical Services (cak4) (Entered: 11/20/2025)
11/18/2025	773 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Cherokee County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	774 (3 pgs)	Motion to Extend Time *to File Objection to Debtors' Notice of Assumption.* Filed by Creditor Cherokee County EMS (anc4) (Entered: 11/20/2025)
11/18/2025	775 (3 pgs)	Motion *for Entry of an Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Miller EMS LLC (mew4) (Entered: 11/20/2025)
11/18/2025	776 (3 pgs)	Motion *for Entry of Order Extending, Nunc Pro Tunc, the Deadline to file Objection to the Debtors' Notice of Assumption and Assignment of Executory Contracts* Filed by Interested Party Lincoln County EMS (cak4) (Entered: 11/20/2025)
11/18/2025	777 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by American Legion Ambulance (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	778 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Alleghany County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	779 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Catawba County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	780 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Gaston County Emergency Medical Services (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)

11/18/2025	781 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Jackson County Fire Rescue (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	782 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by KIWI Emergency Medical Services (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	783 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Lincoln County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	784 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Miller EMS LLC (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	785 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by On Time Ambulance (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/18/2025	786 (2 pgs)	Objection to Debtors Proposed Assumption of Contract for Ambulance Transportation Services and to Proposed Cure Amount by Wake County EMS (Related document(s):605 Notice) (anc4) (Entered: 11/20/2025)
11/19/2025	749 (16 pgs)	Objection *Limited Objection of Elevance Health, Inc. to Assumption or Assumption and Assignment of Executory Contracts*. Filed by Elevance Health, Inc. (Welsh, Jaime) (Entered: 11/19/2025)
11/19/2025	752 (3 pgs)	Motion to Extend Time *to File Objections and for Entry of an Order* Filed by Interested Party McDowell County Rescue Squad and Ambulance (mmm4) (Entered: 11/19/2025)
11/19/2025	753 (4 pgs)	Notice *Of Reservation Of Rights Regarding Fee Applications of White & Case and AlixPartners*. (Related document(s):666 Statement, 684 Statement) Filed by First Lien Agent, Consenting Creditors, and DIP Lenders (Patterson, Johnie) (Entered: 11/19/2025)
11/20/2025	787 (2 pgs)	Notice *of Pretrial Conference to be Held on November 21, 2025, at 2:00 P.M.* Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/20/2025)
11/20/2025	788 (8 pgs)	Certificate *of Service re: 1) Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025; and 2) Motion of Debtors for Entry of an Order Further Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):734 Order on Application to Employ, 745 Generic Motion) (Gershbein, Evan) (Entered: 11/20/2025)
11/20/2025	789 (8 pgs)	Certificate *of Service re: Notice of Pretrial Conference to be Held on November 21, 2025, at 2:00 p.m.* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):787 Notice) (Gershbein, Evan) (Entered: 11/20/2025)

11/20/2025	790 (10 pgs)	Objection */ Debtors' Objection to Motion of Lisa Sallaj for Relief From Stay* (related document(s):657 Motion for Relief From Stay). Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/20/2025)
11/21/2025	791 (9 pgs)	Statement *Verified Statement Pursuant to Bankruptcy Rule 2019* (Filed By First Lien Agent and Consenting Creditors). (Warren, Matthew) (Entered: 11/21/2025)
11/21/2025	792 (10 pgs; 2 docs)	Response/Objection Filed by AmeriHealth Caritas Health Plan, Keystone Family Health Plan. (Related document(s):605 Notice) (Attachments: # 1 Certificate of Service) (Weis, Martin) (Entered: 11/21/2025)
11/21/2025	793 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by First Lien Lenders and Consenting Creditors. This is to order a transcript of 11/21/2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) Electronically forwarded to Judicial Transcribers of Texas on 11/21/2025. Estimated completion date: 11/24/2025. Modified on 11/21/2025 (sew4). (Entered: 11/21/2025)
11/21/2025	794 (1 pg)	Courtroom Minutes. Time Hearing Held: 2:00 pm - 2:20 pm. Appearances: See attached. Additional appearances: George Kildonas Ray Schrock, Jamie Wine for the Debtors. Continued hearing scheduled for 11/25/25 at 5:00 pm on discovery issues involving privilege. (Related document(s):445 Amended Chapter 11 Plan) **Hearing scheduled for 11/25/2025 at 05:00 PM at telephone and video conference.** (tjl4) (Entered: 11/21/2025)
11/21/2025	795 (1 pg)	PDF with attached Audio File. Court Date & Time [11/21/2025 1:57:49 PM]. File Size [11158 KB]. Run Time [00:23:15]. (admin). (Entered: 11/21/2025)
11/21/2025	796 (1 pg)	MOTION to Appear Pro Hac Vice for Kenneth Thomas (Fee Paid: $100, receipt number C26683065) Filed by Creditor Humana Inc., Humana Insurance Company, and their affiliates (Thomas, Kenneth) (Entered: 11/21/2025)
11/21/2025	797 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 18, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 605 Notice, 748 Certificate) (Gershbein, Evan) (Entered: 11/21/2025)
11/24/2025	798 (1 pg)	Order Granting Motion for Kenneth Thomas To Appear pro hac vice (Related Doc # 796) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/24/2025. (tjl4) (Entered: 11/24/2025)
11/24/2025	799 (1 pg)	MOTION to Appear Pro Hac Vice for Colin T. West (Fee Paid: $100, receipt number A26686102) Filed by Creditor Committee Official Committee Of Unsecured Creditors (West, Colin) (Entered: 11/24/2025)

11/24/2025	800 (1 pg)	Order Setting Hearing, Signed on 11/24/2025 (Related document(s):657 Motion for Relief From Stay, 663 Generic Application) **Hearing scheduled for 12/18/2025 at 11:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/24/2025)
11/24/2025	801 (3253 pgs)	Certificate *of Service re Solicitation Materials* (Filed By ModivCare Inc.). (Related document(s):457 Order Setting Hearing, 465 Amended Chapter 11 Plan, 550 Amended Disclosure Statement, 552 Generic Order) (Gershbein, Evan) (Entered: 11/24/2025)
11/24/2025	802 (50 pgs)	Notice *of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):465 Amended Chapter 11 Plan, 725 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 11/24/2025)
11/24/2025	803 (6 pgs)	Declaration re: *Supplemental Declaration of Daniel B. Silvers, Investigating Director of Modivcare, Inc., in Support of Joint Chapter 11 Plan of Reorganization of Modivcare Inc., and its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):687 Declaration) (Tomasco, Patricia) (Entered: 11/24/2025)
11/24/2025	804 (42 pgs)	Response (Filed By Official Committee Of Unsecured Creditors).(Related document(s):687 Declaration) (West, Colin) (Entered: 11/24/2025)
11/24/2025	805	Sealed Document */ Exhibits A-C to Letter Response Regarding Silvers Declaration in Support of Joint Chapter 11 Plan of Reorganization [Docket Nos. 687, 804]* (Filed By Official Committee Of Unsecured Creditors). (West, Colin) (Entered: 11/24/2025)
11/24/2025	806 (55 pgs)	Notice */ Official Committee of Unsecured Creditors' First Supplement to Lien Challenge Motion*. (Related document(s):729 Sealed Document) Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/24/2025)
11/24/2025	807 (59 pgs)	Brief (Filed By ModivCare Inc.).(Related document(s):794 Courtroom Minutes) (Tomasco, Patricia) (Entered: 11/24/2025)
11/25/2025	808 (7 pgs)	Objection *and Reservation of Rights to Debtors' Plan of Reorganization (DN 465)*. Filed by Endurance American Specialty Insurance Company (Walker, Worthy) (Entered: 11/25/2025)
11/25/2025	809 (1 pg)	Order Granting Motion for Colin T. West To Appear pro hac vice (Related Doc # 799) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 11/25/2025. (tjl4) (Entered: 11/25/2025)
11/25/2025	810 (5 pgs)	Objection to Confirmation of Plan Filed by US Trustee. (Related document(s):465 Amended Chapter 11 Plan) (Whitworth, Jana) (Entered: 11/25/2025)
11/25/2025	811 (3 pgs)	Notice of Appearance and Request for Notice Filed by Ryan E Chapple Filed by on behalf of Marybeth Duran as Personal Representative of the Estate of Richard Chavez (Chapple, Ryan) (Entered: 11/25/2025)

11/25/2025	812 (5 pgs)	Objection to Confirmation of Plan Filed by Marybeth Duran as Personal Representative of the Estate of Richard Chavez. (Related document(s):465 Amended Chapter 11 Plan, 802 Notice) (Chapple, Ryan) (Entered: 11/25/2025)
11/25/2025	813 (13 pgs)	Certificate *of Service re: 1) Notice of Third Modified Ordinary Course Professional Schedule; 2) Order Authorizing the Retention and Employment of Cresa, LLC as Real Estate Consultant and Advisor to the Debtors and Debtors in Possession as of the Petition Date; 3) Debtors Motion for Entry of an Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief; and 4) Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):712 Notice, 716 Order on Application to Employ, 722 Motion to Extend Time, 725 Notice) (Gershbein, Evan) (Entered: 11/25/2025)
11/25/2025	814 (21 pgs)	Response/Objection Filed by Salesforce, Inc.. (Related document(s):605 Notice) (Chou, Emily) (Entered: 11/25/2025)
11/25/2025	815 (7 pgs)	Declaration re: *Declaration of Kevin Ramirez in Support of Objection of Salesforce, Inc. to the Potential Assumption of Certain Executory Contracts and Cure Costs, in Connection with the Plan and Reservation of Rights* (Filed By Salesforce, Inc.).(Related document(s):814 Response/Objection) (Chou, Emily) (Entered: 11/25/2025)
11/25/2025	816 (25 pgs)	Certificate *of Service (Supplemental) re Solicitation Materials* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 465 Amended Chapter 11 Plan, 505 Order on Application to Employ, 552 Generic Order, 801 Certificate) (Gershbein, Evan) (Entered: 11/25/2025)
11/25/2025	817 (8 pgs)	Response/Objection Filed by Humana Inc., Humana Insurance Company, and their affiliates. (Related document(s):605 Notice) (Thomas, Kenneth) (Entered: 11/25/2025)
11/25/2025	818 (7 pgs)	Objection to Confirmation of Plan Filed by Humana Inc., Humana Insurance Company, and their affiliates. (Related document(s):465 Amended Chapter 11 Plan) (Thomas, Kenneth) (Entered: 11/25/2025)
11/25/2025	819 (8 pgs)	Objection *TO THE FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES*. Filed by The Chubb Companies (Billingsley, James) (Entered: 11/25/2025)
11/25/2025	820	Sealed Document */ Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	821 (11 pgs)	Declaration re: */ Declaration of Erin M. Smith in Support of the Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* (Filed By Official Committee Of Unsecured

		Creditors).(Related document(s):820 Sealed Document) (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	822	Sealed Document / *Exhibits A-I to Declaration of Erin M. Smith in Support of the Objection of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I) (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	823	Sealed Document *Notice of Filing of Expert Report of Mr. Zul Jamal in Support of Confirmation of Debtors' Plan* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	824 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by ModivCare Inc.. This is to order a transcript of Status Conference 11.25.25 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Access Transcripts (Filed By ModivCare Inc.). (Bell, Brandon) Electronically forwarded to Access Transcripts on 11/26/2025. Estimated completion date: 11/29/2025. Modified on 11/26/2025 (sew4). (Entered: 11/25/2025)
11/25/2025	825 (1 pg)	Courtroom Minutes. Time Hearing Held: 5:00 pm - 5:27 pm. Appearances: See attached. Additional appearances: Deborah Newman. Jamie Wine for the Debtor. Collin Webster. The Court heard oral argument on discovery from the parties. Parties may reach out to the case manager if a further status conference is required. (Related document(s):794 Courtroom Minutes) (tjl4) (Entered: 11/25/2025)
11/25/2025	826 (8 pgs)	Certificate *of Service re: Debtors Objection to Motion of Lisa Sallaj for Relief from Stay* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):790 Objection) (Gershbein, Evan) (Entered: 11/25/2025)
11/25/2025	827 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $25511776 disbursed (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	828 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $1082558 disbursed (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	829 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $4438295 disbursed (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	830 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $181451089 disbursed (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	831 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $54127363 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	832	Sealed Document / *First Supplemental Declaration of George Klidonas Providing Additional Disclosures Related to the Retention of Latham &*

		Watkins LLP as Bankruptcy Counsel (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	833	Sealed Document */ First Supplemental Declaration of Zul Jamal in Connection With Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	834 (10 pgs)	Declaration re: *First Supplemental Declaration of George Klidonas Providing Additional Disclosures Related to the Retention of Latham & Watkins LLP as Bankruptcy Counsel* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	835 (8 pgs)	Declaration re: *First Supplemental Declaration of Zul Jamal in Connection With Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	836 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	837 (7 pgs; 2 docs)	Motion to Seal */ Debtors' Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/25/2025)
11/25/2025	838 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	839 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	840 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	841 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	842 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	843 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	844 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)

11/25/2025	845 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	846 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	847 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	848 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	849 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	850 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	851 (50 pgs)	Objection *of the Official Committee of Unsecured Creditors to Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc., and Its Debtor Affiliates [REDACTED]*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 11/25/2025)
11/25/2025	852 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	853 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	854 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	855 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/25/2025	856 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 10/31/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 11/25/2025)
11/26/2025	857 (1 pg)	Order Continuing Hearing (Time Change Only), Signed on 11/26/2025 (Related document(s):563 Motion to Extend Time) **Hearing scheduled for 12/11/2025 at 11:30 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 11/26/2025)

11/26/2025	858 (11 pgs; 3 docs)	Certificate of No Objection *Regarding Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):660 Sealed Motion, 661 Generic Motion) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	859 (1 pg)	PDF with attached Audio File. Court Date & Time [11/25/2025 4:59:43 PM]. File Size [13394 KB]. Run Time [00:27:54]. (admin). (Entered: 11/26/2025)
11/26/2025	860 (5 pgs)	Witness List (Filed By Official Committee Of Unsecured Creditors). (Related document(s):548 Generic Order) (Koster, Charles) (Entered: 11/26/2025)
11/26/2025	861 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the November 25, 2025 Proceeding before Judge Alfredo R. Perez. Court Reporter/Transcriber: Access Transcripts (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Access Transcripts on 12/1/25. Estimated completion date: 12/2/25. Modified on 12/1/2025 (anc4). (Entered: 11/26/2025)
11/26/2025	862 (3 pgs)	Witness List (Filed By First Lien Agent, Consenting Creditors, and DIP Lenders). (Warren, Matthew) (Entered: 11/26/2025)
11/26/2025	863 (4 pgs)	Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Engagement Letters and Granting Related Relief, Signed on 11/26/2025 (Related document(s):660 Sealed Motion, 661 Generic Motion) (tjl4) (Entered: 11/26/2025)
11/26/2025	864 (3 pgs)	Witness List (Filed By ModivCare Inc.).(Related document(s):548 Generic Order) (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	865	Sealed Document / *Supplemental Declaration of Chad J. Shandler in Support of the Application of Debtors for Entry of an Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for Debtors Effective as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	866 (11 pgs)	Declaration re: *Supplemental Declaration of Chad J. Shandler in Support of the Application of Debtors for Entry of an Order (A) Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. as Financial Advisor, (II) Designate Chad J. Shandler to Serve as Chief Transformation Officer, and (III) Provide Additional Personnel for Debtors Effective as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)

11/26/2025	867	Sealed Document *Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection With Debtors' Insurance Programs*, Stipulation By ModivCare Inc. and Ace American Insurance Company and ESIS, Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	868 (22 pgs)	Stipulation By ModivCare Inc. and ACE American Insurance Company and ESIS, Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 11/26/2025)
11/26/2025	869 (7 pgs; 2 docs)	Motion to Seal */ Debtors' Motion to File Under Seal Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection With Debtors' Insurance Programs* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 11/26/2025)
11/28/2025	870 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 11/28/2025)
11/28/2025	871 (12 pgs)	Certificate *of Service re: 1) Notice of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 2) Supplemental Declaration of Daniel B. Silvers, Investigating Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):802 Notice, 803 Declaration) (Gershbein, Evan) (Entered: 11/28/2025)
11/28/2025	872 (9 pgs)	Certificate *of Service re: 1) First Supplemental Declaration of George Klidonas Providing Additional Disclosures Related to the Retention of Latham & Watkins LLP as Bankruptcy Counsel; 2) First Supplemental Declaration of Zul Jamal in Connection with Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date; and 3) Debtors Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):834 Declaration, 835 Declaration, 837 Motion to Seal) (Gershbein, Evan) (Entered: 11/28/2025)
11/30/2025	873 (19 pgs)	BNC Certificate of Mailing. (Related document(s):863 Generic Order) No. of Notices: 104. Notice Date 11/30/2025. (Admin.) (Entered: 11/30/2025)
12/01/2025	874 (2 pgs)	Order Granting Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal (Related Doc # 662), Signed on 12/1/2025. (abh4) (Entered: 12/01/2025)
12/01/2025	875 (18 pgs; 2 docs)	Transcript RE: Pretrial Conference held on November 21, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on

		PACER. Filed by Transcript access will be restricted through 03/2/2026. (mhen) (Entered: 12/01/2025)
12/01/2025	876 (3 pgs)	Notice *of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/01/2025)
12/01/2025	881 (8 pgs)	Response *to Debtor's Objection to Motion of Lisa Sallaj for Relief from Stay* (related document(s):657 Motion for Relief From Stay and 790 Objection / Debtors' Objection to Motion of Lisa Sallaj for Relief From Stay). Filed by Lisa Sallaj (amp4) (Entered: 12/02/2025)
12/02/2025	877 (4 pgs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/02/2025)
12/02/2025	878 (1 pg)	MOTION to Appear Pro Hac Vice for Donald V. Valenzano Jr. Esq. (Fee Paid: $100, receipt number A26705438) Filed by Creditor Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties (Bressler, Gary) (Main Document 878 replaced on 12/3/2025) (AkeitaHouse). (Entered: 12/02/2025)
12/02/2025		Hearing Continued by Agreement (Related document(s):471 Motion for Relief From Stay) Parties contacted the Case Manager. **Hearing scheduled for 12/18/2025 at 11:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 12/02/2025)
12/02/2025		Hearing Set by Request (Related document(s):445 Amended Chapter 11 Plan) Contacted by Catherine Rankin. Movant to notice all interested parties and file a certificate of service with the court. **Status conference to be held on 12/3/2025 at 08:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 12/02/2025)
12/02/2025	879 (10 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Extending Time to Assume or to Reject Unexpired Leases of Nonresidential Real Property* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/02/2025)
12/02/2025	880 (2 pgs)	Notice *of Status Conference to be Held on December 3, 2025, at 8:00 A.M.* (Related document(s):465 Amended Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/02/2025)
12/02/2025	882 (92 pgs; 6 docs)	Statement */ White & Case LLP's Second Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2025 to and Including October 31, 2025* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Koster, Charles) (Entered: 12/02/2025)
12/02/2025	883 (12 pgs; 3 docs)	Statement *Letter from Daniel B. Silvers, director of ModivCare Inc. to Judge Perez* (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A # 2 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	884 (283 pgs; 8 docs)	Reply *to Objection to Claim 1678 and 1679*. Filed by Alea Rachel Kennedy (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit D (con't) # 6 Exhibit D (con't) # 7 Exhibit D (con't)) (anc4) (Entered: 12/02/2025)

12/02/2025	885	Sealed Document *Letter from Daniel B. Silvers, a director of Mondivcare Inc. to Judge Perez* (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A-part 1 # 2 Exhibit A-part 2 # 3 Exhibit A-part 3 # 4 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	886 (9 pgs; 3 docs)	Statement *Letter from Daniel B. Silvers, a director of ModivCare Inc. to Judge Perez with Amended Exhibit B* (Filed By ModivCare Inc.). (Related document(s):883 Statement) (Attachments: # 1 Exhibit B # 2 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	887	Sealed Document *Letter from Daniel B. Silvers, a director of ModivCare Inc. with an Amended Exhibit B* (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A, Part 1 # 2 Exhibit A-Part 2 # 3 Exhibit A-Part 3 # 4 Exhibit B) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	888 (5 pgs; 2 docs)	Motion to Seal *the December 2, 2025, Letter to the Court* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 12/02/2025)
12/02/2025	889 (16 pgs)	Certificate *of Service re: Documents Served on November 26, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):618 Debtor-in-Possession Monthly Operating Report, 619 Debtor-in-Possession Monthly Operating Report, 620 Debtor-in-Possession Monthly Operating Report, 621 Debtor-in-Possession Monthly Operating Report, 622 Debtor-in-Possession Monthly Operating Report, 623 Debtor-in-Possession Monthly Operating Report, 624 Debtor-in-Possession Monthly Operating Report, 625 Debtor-in-Possession Monthly Operating Report, 626 Debtor-in-Possession Monthly Operating Report, 627 Debtor-in-Possession Monthly Operating Report, 628 Debtor-in-Possession Monthly Operating Report, 629 Debtor-in-Possession Monthly Operating Report, 630 Debtor-in-Possession Monthly Operating Report, 631 Debtor-in-Possession Monthly Operating Report, 632 Debtor-in-Possession Monthly Operating Report, 633 Debtor-in-Possession Monthly Operating Report, 634 Debtor-in-Possession Monthly Operating Report, 635 Debtor-in-Possession Monthly Operating Report, 636 Debtor-in-Possession Monthly Operating Report, 637 Debtor-in-Possession Monthly Operating Report, 638 Debtor-in-Possession Monthly Operating Report, 639 Debtor-in-Possession Monthly Operating Report, 640 Debtor-in-Possession Monthly Operating Report, 641 Debtor-in-Possession Monthly Operating Report, 827 Debtor-in-Possession Monthly Operating Report, 828 Debtor-in-Possession Monthly Operating Report, 829 Debtor-in-Possession Monthly Operating Report, 830 Debtor-in-Possession Monthly Operating Report, 831 Debtor-in-Possession Monthly Operating Report, 836 Debtor-in-Possession Monthly Operating Report, 838 Debtor-in-Possession Monthly Operating Report, 839 Debtor-in-Possession Monthly Operating Report, 840 Debtor-in-Possession Monthly Operating Report, 841 Debtor-in-Possession Monthly Operating Report, 842 Debtor-in-Possession Monthly Operating Report, 843 Debtor-in-Possession Monthly Operating Report, 844 Debtor-in-Possession Monthly Operating Report, 845 Debtor-in-Possession Monthly Operating Report, 846 Debtor-in-Possession Monthly Operating Report, 847 Debtor-in-Possession Monthly Operating Report, 848 Debtor-in-Possession Monthly Operating Report, 849 Debtor-in-Possession Monthly Operating Report, 850 Debtor-in-Possession Monthly Operating Report, 852 Debtor-in-Possession Monthly Operating Report, 853 Debtor-in-Possession Monthly Operating Report, 854 Debtor-in-

		Possession Monthly Operating Report, 855 Debtor-in-Possession Monthly Operating Report, 856 Debtor-in-Possession Monthly Operating Report, 863 Generic Order, 864 Witness List, 866 Declaration, 868 Stipulation, 869 Motion to Seal) (Gershbein, Evan) (Entered: 12/02/2025)
12/03/2025	890 (2 pgs)	Witness List (Filed By US Trustee).(Related document(s):552 Generic Order) (Whitworth, Jana) (Entered: 12/03/2025)
12/03/2025	891 (2 pgs)	Statement / *Letter to the Court by the Committee re: Response to Letter of Daniel B. Silvers, Investigating Director of ModivCare Inc.* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):883 Statement, 886 Statement) (West, Colin) (Entered: 12/03/2025)
12/03/2025		Hearing Set On (Related document(s):728 Sealed Motion, 729 Sealed Document) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 12/8/2025 at 09:00 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 12/03/2025)
12/03/2025	892 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:00 am to 8:31 am. Appearances: see log. Additional appearances: Deborah Newman, Christopher "Chris" Shore, and Kristopher "Kris" Hansen. Status conference held. Oral argument heard on the record. No action taken by the Court. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan) (abh4) (Entered: 12/03/2025)
12/03/2025	893 (1 pg)	Order Granting Motion for Donald V. Valenzano, Jr. To Appear pro hac vice (Related Doc # 878) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/3/2025. (abh4) (Entered: 12/03/2025)
12/03/2025	894 (1 pg)	PDF with attached Audio File. Court Date & Time [12/3/2025 8:00:15 AM]. File Size [14462 KB]. Run Time [00:30:08]. (admin). (Entered: 12/03/2025)
12/03/2025	895 (1 pg)	MOTION to Appear Pro Hac Vice for Phillip A. Martin (Fee Paid: $100, receipt number A26708516) Filed by Creditor Endurance American Specialty Insurance Company (Martin, Phillip) (Entered: 12/03/2025)
12/03/2025	896 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the November 21, 2025 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Copy request electronically forwarded to Judicial Transcribers of Texas 12/3/2025. Estimated completion date: 12/4/2025. Modified on 12/3/2025 (sew4). (Entered: 12/03/2025)

12/03/2025	897 (112 pgs; 3 docs)	Statement / *Second Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from October 1, 2025 Through October 31, 2025* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B) (Koster, Charles) (Entered: 12/03/2025)
12/03/2025	898 (21 pgs; 2 docs)	Transcript RE: Discovery Conference held on 11/25/25 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/3/2026. (AccessTranscripts) (Entered: 12/03/2025)
12/04/2025	899 (1 pg)	Order Granting Motion for Phillip A. Martin To Appear pro hac vice (Related Doc # 895) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/4/2025. (abh4) (Entered: 12/04/2025)
12/04/2025	900 (3 pgs)	Witness List, Exhibit List (Filed By Humana Inc., Humana Insurance Company, and their affiliates).(Related document(s):552 Generic Order) (Thomas, Kenneth) (Entered: 12/04/2025)
12/04/2025	901 (157 pgs; 6 docs)	Exhibit List, Witness List (Filed By Marybeth Duran as Personal Representative of the Estate of Richard Chavez).(Related document(s):465 Amended Chapter 11 Plan) (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5) (Chapple, Ryan) (Entered: 12/04/2025)
12/04/2025	902 (36 pgs)	Exhibit List (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document, 732 Generic Motion, 733 Generic Motion) (Davidson, Timothy) (Entered: 12/04/2025)
12/04/2025	903 (35 pgs; 11 docs)	Witness List, Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	904 (265 pgs; 41 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 11 # 2 Exhibit 12 # 3 Exhibit 13 # 4 Exhibit 14 # 5 Exhibit 15 # 6 Exhibit 16 # 7 Exhibit 17 # 8 Exhibit 18 # 9 Exhibit 19 # 10 Exhibit 20 # 11 Exhibit 21 # 12 Exhibit 22 # 13 Exhibit 23 # 14 Exhibit 24 # 15 Exhibit 25 # 16 Exhibit 26 # 17 Exhibit 27 # 18 Exhibit 28 # 19 Exhibit 29 # 20 Exhibit 30 # 21 Exhibit 31 # 22 Exhibit 32 # 23 Exhibit 33 # 24 Exhibit 34 # 25 Exhibit 35 # 26 Exhibit 36 # 27 Exhibit 37 # 28 Exhibit 38 # 29 Exhibit 39 # 30 Exhibit 40 # 31 Exhibit 41 # 32 Exhibit 42 # 33 Exhibit 43 # 34 Exhibit 44 # 35 Exhibit 45 # 36 Exhibit 46 # 37 Exhibit 47 # 38 Exhibit 48 # 39 Exhibit 49 # 40 Exhibit 50) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	905 (78 pgs; 51 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 51 # 2 Exhibit 52 # 3 Exhibit 53 # 4 Exhibit 54 # 5 Exhibit 55 # 6 Exhibit 56 # 7 Exhibit 57 # 8 Exhibit 58 # 9

		Exhibit 59 # 10 Exhibit 60 # 11 Exhibit 61 # 12 Exhibit 62 # 13 Exhibit 63 # 14 Exhibit 64 # 15 Exhibit 65 # 16 Exhibit 66 # 17 Exhibit 67 # 18 Exhibit 68 # 19 Exhibit 69 # 20 Exhibit 70 # 21 Exhibit 71 # 22 Exhibit 72 # 23 Exhibit 73 # 24 Exhibit 74 # 25 Exhibit 75 # 26 Exhibit 76 # 27 Exhibit 77 # 28 Exhibit 78 # 29 Exhibit 79 # 30 Exhibit 80 # 31 Exhibit 81 # 32 Exhibit 82 # 33 Exhibit 83 # 34 Exhibit 84 # 35 Exhibit 85 # 36 Exhibit 86 # 37 Exhibit 87 # 38 Exhibit 88 # 39 Exhibit 89 # 40 Exhibit 90 # 41 Exhibit 91 # 42 Exhibit 92 # 43 Exhibit 93 # 44 Exhibit 94 # 45 Exhibit 95 # 46 Exhibit 96 # 47 Exhibit 97 # 48 Exhibit 98 # 49 Exhibit 99 # 50 Exhibit 100) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	906 (151 pgs; 51 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 101 # 2 Exhibit 102 # 3 Exhibit 103 # 4 Exhibit 104 # 5 Exhibit 105 # 6 Exhibit 106 # 7 Exhibit 107 # 8 Exhibit 108 # 9 Exhibit 109 # 10 Exhibit 110 # 11 Exhibit 111 # 12 Exhibit 112 # 13 Exhibit 113 # 14 Exhibit 114 # 15 Exhibit 115 # 16 Exhibit 116 # 17 Exhibit 117 # 18 Exhibit 118 # 19 Exhibit 119 # 20 Exhibit 120 # 21 Exhibit 121 # 22 Exhibit 122 # 23 Exhibit 123 # 24 Exhibit 124 # 25 Exhibit 125 # 26 Exhibit 126 # 27 Exhibit 127 # 28 Exhibit 128 # 29 Exhibit 129 # 30 Exhibit 130 # 31 Exhibit 131 # 32 Exhibit 132 # 33 Exhibit 133 # 34 Exhibit 134 # 35 Exhibit 135 # 36 Exhibit 136 # 37 Exhibit 137 # 38 Exhibit 138 # 39 Exhibit 139 # 40 Exhibit 140 # 41 Exhibit 141 # 42 Exhibit 142 # 43 Exhibit 143 # 44 Exhibit 144 # 45 Exhibit 145 # 46 Exhibit 146 # 47 Exhibit 147 # 48 Exhibit 148 # 49 Exhibit 149 # 50 Exhibit 150) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	907 (2571 pgs; 41 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 151 # 2 Exhibit 152 # 3 Exhibit 153 # 4 Exhibit 154 # 5 Exhibit 155 # 6 Exhibit 156 # 7 Exhibit 157 # 8 Exhibit 158 # 9 Exhibit 159 # 10 Exhibit 160 # 11 Exhibit 161 # 12 Exhibit 162 # 13 Exhibit 163 # 14 Exhibit 164 # 15 Exhibit 165 # 16 Exhibit 166 # 17 Exhibit 167 # 18 Exhibit 168 # 19 Exhibit 169 # 20 Exhibit 170 # 21 Exhibit 171 # 22 Exhibit 172 # 23 Exhibit 173 # 24 Exhibit 174 # 25 Exhibit 175 # 26 Exhibit 176 # 27 Exhibit 177 # 28 Exhibit 178 # 29 Exhibit 179 # 30 Exhibit 180 # 31 Exhibit 181 # 32 Exhibit 182 # 33 Exhibit 183 # 34 Exhibit 184 # 35 Exhibit 185 # 36 Exhibit 186 # 37 Exhibit 187 # 38 Exhibit 188 # 39 Exhibit 189 # 40 Exhibit 190) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	908 (2033 pgs; 38 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 191 # 2 Exhibit 192 # 3 Exhibit 193 # 4 Exhibit 194 # 5 Exhibit 195 # 6 Exhibit 196 # 7 Exhibit 197 # 8 Exhibit 198 # 9 Exhibit 199 # 10 Exhibit 200 - Filed Under Seal # 11 Exhibit 201 # 12 Exhibit 202 # 13 Exhibit 203 # 14 Exhibit 204 # 15 Exhibit 205 # 16 Exhibit 206 # 17 Exhibit 207 # 18 Exhibit 208 # 19 Exhibit 209 # 20 Exhibit 210 # 21 Exhibit 211 # 22 Exhibit 212 # 23 Exhibit 213 # 24 Exhibit 214 # 25 Exhibit 215 # 26 Exhibit 216 # 27 Exhibit 217 # 28 Exhibit 218 # 29 Exhibit 219 # 30 Exhibit 220 # 31 Exhibit 221 # 32 Exhibit 222 # 33 Exhibit 223 # 34 Exhibit 224 # 35 Exhibit 225 # 36 Exhibit 226 # 37 Exhibit 227) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	909	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6

		Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 - Part 1 # 9 Exhibit 8 - Part 2 # 10 Exhibit 8 - Part 3) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	910	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 8 - part 4 # 2 Exhibit 8 - part 5 # 3 Exhibit 9 # 4 Exhibit 10 # 5 Exhibit 11 # 6 Exhibit 12 # 7 Exhibit 13 # 8 Exhibit 14 # 9 Exhibit 15 # 10 Exhibit 16 # 11 Exhibit 17 # 12 Exhibit 18 # 13 Exhibit 19 # 14 Exhibit 20 # 15 Exhibit 21 # 16 Exhibit 22 # 17 Exhibit 23 # 18 Exhibit 25) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	911	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 26 # 2 Exhibit 27 # 3 Exhibit 28 # 4 Exhibit 29 # 5 Exhibit 30 # 6 Exhibit 31 # 7 Exhibit 32 # 8 Exhibit 33 # 9 Exhibit 34 # 10 Exhibit 35 # 11 Exhibit 36 # 12 Exhibit 37 # 13 Exhibit 38 # 14 Exhibit 39 # 15 Exhibit 40) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	912	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 41 # 2 Exhibit 42 # 3 Exhibit 43 # 4 Exhibit 44 # 5 Exhibit 45 # 6 Exhibit 46 # 7 Exhibit 52 # 8 Exhibit 53 # 9 Exhibit 54 # 10 Exhibit 55 # 11 Exhibit 56 # 12 Exhibit 57 # 13 Exhibit 58 # 14 Exhibit 59 # 15 Exhibit 60 # 16 Exhibit 61 # 17 Exhibit 62 # 18 Exhibit 63 # 19 Exhibit 64 # 20 Exhibit 65 # 21 Exhibit 66 # 22 Exhibit 67 # 23 Exhibit 68 # 24 Exhibit 69 # 25 Exhibit 70) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	913 (8 pgs)	Certificate *of Service re: 1) Order Granting Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal; and 2) Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):874 Order on Motion to Seal, 876 Notice) (Gershbein, Evan) (Entered: 12/04/2025)
12/04/2025	914	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 71 # 2 Exhibit 72 - Part 1 # 3 Exhibit 72 - Part 2 # 4 Exhibit 73 # 5 Exhibit 74 # 6 Exhibit 75 # 7 Exhibit 76 # 8 Exhibit 77 # 9 Exhibit 78 # 10 Exhibit 79 - Part 1 # 11 Exhibit 79 - Part 2 # 12 Exhibit 80 # 13 Exhibit 81 # 14 Exhibit 82 # 15 Exhibit 83 # 16 Exhibit 84 # 17 Exhibit 85 # 18 Exhibit 86 # 19 Exhibit 87 # 20 Exhibit 88 # 21 Exhibit 89 # 22 Exhibit 90 # 23 Exhibit 91 # 24 Exhibit 92 # 25 Exhibit 93 # 26 Exhibit 94 # 27 Exhibit 95 # 28 Exhibit 96 # 29 Exhibit 97 # 30 Exhibit 98 # 31 Exhibit 99 # 32 Exhibit 100) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	915	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 101 - Part 1 # 2 Exhibit 101 - Part 2 # 3 Exhibit 102 # 4

		Exhibit 103 # 5 Exhibit 104 # 6 Exhibit 105 # 7 Exhibit 106 # 8 Exhibit 107 # 9 Exhibit 108 # 10 Exhibit 109 # 11 Exhibit 110 # 12 Exhibit 111 # 13 Exhibit 112 # 14 Exhibit 113 # 15 Exhibit 114 # 16 Exhibit 115 # 17 Exhibit 116 # 18 Exhibit 117 # 19 Exhibit 118 # 20 Exhibit 119 # 21 Exhibit 120 # 22 Exhibit 121 # 23 Exhibit 122 # 24 Exhibit 123 # 25 Exhibit 124 # 26 Exhibit 125 # 27 Exhibit 126 # 28 Exhibit 127 # 29 Exhibit 128 # 30 Exhibit 129 # 31 Exhibit 130) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	916 (47 pgs)	Declaration re: *Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of Modvicare Inc. and Its Debtor Affiliates* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/04/2025)
12/04/2025	917 (108 pgs; 8 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 131 # 2 Exhibit 132 # 3 Exhibit 133 # 4 Exhibit 134 # 5 Exhibit 135 # 6 Exhibit 136 # 7 Exhibit 137) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	918	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 138 # 2 Exhibit 139 # 3 Exhibit 140 # 4 Exhibit 141 # 5 Exhibit 142 # 6 Exhibit 143 # 7 Exhibit 144 # 8 Exhibit 145 # 9 Exhibit 146 # 10 Exhibit 147 # 11 Exhibit 148 # 12 Exhibit 149 # 13 Exhibit 150 # 14 Exhibit 151 # 15 Exhibit 152 # 16 Exhibit 153 # 17 Exhibit 154 # 18 Exhibit 155 # 19 Exhibit 156 # 20 Exhibit 157 # 21 Exhibit 158 # 22 Exhibit 159 # 23 Exhibit 160) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	919 (3182 pgs; 40 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 161 # 2 Exhibit 162 # 3 Exhibit 163 # 4 Exhibit 164 # 5 Exhibit 165 # 6 Exhibit 166 # 7 Exhibit 167 # 8 Exhibit 168 # 9 Exhibit 169 # 10 Exhibit 170 # 11 Exhibit 171 # 12 Exhibit 172 # 13 Exhibit 173 # 14 Exhibit 174 # 15 Exhibit 175 # 16 Exhibit 176 # 17 Exhibit 177 # 18 Exhibit 178 # 19 Exhibit 179 # 20 Exhibit 180 # 21 Exhibit 181 # 22 Exhibit 182 # 23 Exhibit 183 # 24 Exhibit 184 # 25 Exhibit 185 # 26 Exhibit 186 # 27 Exhibit 187 # 28 Exhibit 188 # 29 Exhibit 189 # 30 Exhibit 190 # 31 Exhibit 191 # 32 Exhibit 192 # 33 Exhibit 193 # 34 Exhibit 194 # 35 Exhibit 195 # 36 Exhibit 196 # 37 Exhibit 197 # 38 Exhibit 198 # 39 Exhibit 199) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	920	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 A.M. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 200) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	921	Sealed Document *Debtors' Omnibus Brief (A) in Support of Plan Confirmation and (B) Objecting to Committee's Motions for Standing to Pursue Claims and Lien Challenges*, Brief (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit A) (Davidson, Timothy) (Entered: 12/04/2025)

12/04/2025	922 (1411 pgs; 28 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 201 # 2 Exhibit 202 # 3 Exhibit 203 # 4 Exhibit 204 # 5 Exhibit 205 # 6 Exhibit 206 # 7 Exhibit 207 # 8 Exhibit 208 # 9 Exhibit 209 # 10 Exhibit 210 # 11 Exhibit 211 # 12 Exhibit 212 # 13 Exhibit 213 # 14 Exhibit 214 # 15 Exhibit 215 # 16 Exhibit 216 # 17 Exhibit 217 # 18 Exhibit 218 # 19 Exhibit 219 # 20 Exhibit 220 # 21 Exhibit 221 # 22 Exhibit 222 # 23 Exhibit 223 # 24 Exhibit 224 # 25 Exhibit 225 # 26 Exhibit 226 # 27 Exhibit 227) (Koster, Charles) (Entered: 12/04/2025)
12/04/2025	923 (39 pgs)	Statement *of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Affiliates and Joinder in Debtors' Reply Brief* (Filed By First Lien Agent and Consenting Creditors).(Related document(s):820 Sealed Document, 921 Sealed Document, Brief) (Warren, Matthew) (Entered: 12/04/2025)
12/04/2025	924 (16 pgs)	BNC Certificate of Mailing. (Related document(s):875 Transcript) No. of Notices: 104. Notice Date 12/04/2025. (Admin.) (Entered: 12/04/2025)
12/04/2025	925 (52 pgs)	Omnibus Response *of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (related document(s):728 Sealed Motion, 732 Generic Motion, 733 Generic Motion). Filed by First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 12/04/2025)

12/04/2025	926 (1242 pgs; 40 docs)	Declaration re: *Declaration of Matthew L. Warren in Support of: (I) Omnibus Response of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors Estates and (B) Exclusive Settlement Authority ; and (ii) Statement of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and Joinder in Debtors Reply Brief* (Filed By First Lien Agent and Consenting Creditors).(Related document(s):923 Statement, 925 Response) (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N # 15 Exhibit O # 16 Exhibit P # 17 Exhibit Q # 18 Exhibit R # 19 Exhibit S # 20 Exhibit T # 21 Exhibit U # 22 Exhibit V # 23 Exhibit W # 24 Exhibit X # 25 Exhibit Y # 26 Exhibit Z # 27 Exhibit AA # 28 Exhibit BB # 29 Exhibit CC # 30 Exhibit DD # 31 Exhibit DD-1 # 32 Exhibit DD-2 # 33 Exhibit DD-3 # 34 Exhibit DD-4 # 35 Exhibit DD-5 # 36 Exhibit DD-6 # 37 Exhibit EE # 38 Exhibit FF # 39 Exhibit GG) (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	927	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-001 # 2 DX-002 # 3 DX-003 # 4 DX-004 # 5 DX-005 # 6 DX-006 # 7 DX-007 # 8 DX-008 # 9 DX-009 # 10 DX-010 # 11 DX-011 # 12 DX-012 # 13 DX-013 # 14 DX-014 # 15 DX-015 # 16 DX-016 # 17 DX-017 # 18 DX-018 # 19 DX-019 # 20 DX-020 # 21 DX-021 # 22 DX-022 # 23 DX-023 # 24 DX-024 # 25 DX-025 # 26 DX-026 # 27 DX-027 # 28 DX-028 # 29 DX-029 # 30 DX-030 # 31 DX-031 # 32 DX-032 # 33 DX-033 # 34 DX-034 # 35 DX-035 # 36 DX-036 # 37 DX-037 # 38 DX-038 # 39 DX-039 # 40 DX-040 # 41 DX-041 # 42 DX-042 # 43 DX-043 # 44 DX-044) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	928	Sealed Document , Witness List (Filed By ModivCare Inc.). (Attachments: # 1 DX-045 # 2 DX-046 # 3 DX-047 # 4 DX-048 # 5 DX-049 # 6 DX-050 # 7 DX-051 # 8 DX-052 # 9 DX-053 # 10 DX-054 # 11 DX-055 # 12 DX-056 # 13 DX-057 # 14 DX-058 # 15 DX-059 # 16 DX-060 # 17 DX-061 # 18 DX-062 # 19 DX-063 # 20 DX-064 # 21 DX-065 # 22 DX-066 # 23 DX-067 # 24 DX-068 # 25 DX-069 # 26 DX-070 # 27 DX-071 # 28 DX-072 # 29 DX-073 # 30 DX-074 # 31 DX-075 # 32 DX-076 # 33 DX-077A # 34 DX-077B # 35 DX-078 # 36 DX-079 # 37 DX-080 # 38 DX-081 # 39 DX-082 # 40 DX-083 # 41 DX-084 # 42 DX-085 # 43 DX-086 # 44 DX-087 # 45 DX-088) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	929	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Dx-175 # 2 Dx-176 # 3 Dx-177 # 4 Dx-178 # 5 Dx-179 # 6 Dx-180 # 7 Dx-181 # 8 Dx-183 # 9 Dx-183 # 10 Dx-184 # 11 Dx-185 # 12 Dx-186 # 13 Dx-187 # 14 Dx-188 # 15 Dx-189 # 16 Dx-190 # 17 Dx-191 # 18 Dx-192 # 19 Dx-193 # 20 Dx-194 # 21 Dx-195 # 22 Dx-196 # 23 Dx-197 # 24 Dx-198 # 25 Dx-199 # 26 Dx-200 # 27 Dx-201 # 28 Dx-202 # 29 Dx-203 # 30 Dx-204 # 31 Dx-205 # 32 Dx-206 # 33 Dx-207 # 34 Dx-208 # 35 Dx-209 # 36 Dx-210 # 37 Dx-211 # 38 Dx-212 # 39 Dx-213 # 40 Dx-214 # 41 Dx-215 # 42 Dx-216 # 43

		Dx-217 # 44 Dx-218 # 45 Dx-219) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	930	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-089 # 2 DX-090 # 3 DX-091 # 4 DX-092 # 5 DX-093 # 6 DX-094 # 7 DX-095 # 8 DX-096 # 9 DX-097 # 10 DX-098 # 11 DX-099 # 12 DX-100 # 13 DX-101 # 14 DX-102 # 15 DX-103 # 16 DX-104 # 17 DX-105 # 18 DX-106 # 19 DX-107 # 20 DX-108 # 21 DX-109 # 22 DX-110 # 23 DX-111 # 24 DX-112 # 25 DX-113 # 26 DX-114 # 27 DX-115 # 28 DX-116 # 29 DX-117 # 30 DX-118 # 31 DX-119 # 32 DX-120 # 33 DX-121 # 34 DX-122 # 35 DX-123 # 36 DX-124 # 37 DX-125 # 38 DX-126 # 39 DX-127 # 40 DX-128 # 41 DX-129 # 42 DX-130 # 43 DX-131) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	931	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-132 # 2 DX-133 # 3 DX-134 # 4 DX-135 # 5 DX-136 # 6 DX-137 # 7 DX-138 # 8 DX-139 # 9 DX-140 # 10 DX-141 # 11 DX-142 # 12 DX-143 # 13 DX-144 # 14 DX-145 # 15 DX-146 # 16 DX-147 # 17 DX-148 # 18 DX-149 # 19 DX-150 # 20 DX-151 # 21 DX-152 # 22 DX-153 # 23 DX-154 # 24 DX-155 # 25 DX-156 # 26 DX-157 # 27 DX-158 # 28 DX-159 # 29 DX-160 # 30 DX-161 # 31 DX-162 # 32 DX-163 # 33 DX-164 # 34 DX-165 # 35 DX-166 # 36 DX-167 # 37 DX-168 # 38 DX-169 # 39 DX-170 # 40 DX-171 # 41 DX-172 # 42 DX-173 # 43 DX-174) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	932	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-220 # 2 DX-221 # 3 DX-222 # 4 DX-223 # 5 DX-224 # 6 DX-225 # 7 DX-226 # 8 DX-227 # 9 DX-228 # 10 DX-229 # 11 DX-230 # 12 DX-231 # 13 DX-232 # 14 DX-233 # 15 DX-234 # 16 DX-235 # 17 DX-236 # 18 DX-237 # 19 DX-238 # 20 DX-239 # 21 DX-240 # 22 DX-241 # 23 DX-242 # 24 DX-243 # 25 DX-245 # 26 DX-246 # 27 DX-247 # 28 DX-248 # 29 DX-249 # 30 DX-250 # 31 DX-251 # 32 DX-252 # 33 DX-253 # 34 DX-254 # 35 DX-255 # 36 DX-256 # 37 DX-257 # 38 DX-258 # 39 DX-259 # 40 DX-260 # 41 DX-261 # 42 DX-262 # 43 DX-263) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	933	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-264 # 2 DX-265 # 3 DX-266 # 4 DX-267 # 5 268 # 6 DX-269 # 7 DX-270 # 8 DX-271 # 9 DX-272 # 10 DX-273 # 11 DX-274 # 12 DX-275 # 13 DX-276 # 14 DX-277 # 15 DX-278 # 16 DX-279 # 17 DX-280 # 18 DX-281 # 19 DX-282 # 20 DX-283 # 21 DX-284 # 22 DX-285 # 23 DX-286 # 24 DX-287 # 25 DX-288 # 26 DX-289 # 27 DX-290 # 28 DX-291 # 29 DX-292 # 30 DX-293 # 31 DX-294 # 32 DX-295 # 33 DX-296 # 34 DX-297 # 35 DX-298 # 36 DX-299 # 37 DX-300 # 38 DX-301) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	934	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-303 # 2 DX-304 # 3 DX-305 # 4 DX-306 # 5 DX-307 # 6 DX-308 # 7 DX-309 # 8 DX-310 # 9 DX-311 # 10 DX-312 # 11 DX-313 # 12 DX-314 # 13 DX-315 # 14 DX-316 # 15 DX-317 # 16 DX-318 # 17 DX-319 # 18 DX-320 # 19 DX-321 # 20 DX-322 # 21 DX-323 # 22 DX-324 # 23 DX-325 # 24 DX-326 # 25 DX-327 # 26 DX-328 # 27 DX-329 # 28 DX-330 # 29 DX-331 # 30 DX-332 # 31 DX-333 # 32 DX-334 # 33 DX-335 # 34 DX-336 # 35 DX-337 # 36 DX-339 # 37 DX-340 # 38 DX-341 # 39 DX-342 # 40 DX-

		343 # 41 DX-344 # 42 DX-345 # 43 DX-346 # 44 DX-347 # 45 DX-349) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	935	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JK-001 # 2 JX-002 # 3 JX-003 # 4 JX-004 # 5 JX-005 # 6 JX-006 # 7 JX-007 # 8 JX-008 # 9 JX-009 # 10 JX-010 # 11 JX-011 # 12 JX-012 # 13 JX-013) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	936	Sealed Document , Witness List (Filed By ModivCare Inc.). (Attachments: # 1 JX-014 # 2 JX-015 # 3 JX-016 # 4 JX-017 # 5 JX-018 # 6 JX-019 # 7 JX-020 # 8 JX-021 # 9 JX-022 # 10 JX-023 # 11 JX-024 # 12 JX-025 # 13 JX-026) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	937	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-027 # 2 JX-028 # 3 JX-029 # 4 JX-030 # 5 JX-031 # 6 JX-032 # 7 JX-033 # 8 JX-034 # 9 JX-035 # 10 JX-036 # 11 JX-037 # 12 JX-038) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	938	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-040 # 2 JX-041 # 3 JX-042 # 4 JX-043 # 5 JX-044 # 6 JX-045 # 7 JX-046 # 8 JX-047 # 9 JX-048 # 10 JX-049 # 11 JX-050 # 12 JX-051) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	939	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-052 # 2 JX-053 # 3 JX-055 # 4 JX-057 # 5 JX-058 # 6 JX-059 # 7 JX-060 # 8 JX-061 # 9 JX-062 # 10 JX-063) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	940	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-064 # 2 JX-065 # 3 JX-066 # 4 JX-067 # 5 JX-068 # 6 JX-069 # 7 JX-070 # 8 JX-071 # 9 JX-072 # 10 JX-073 # 11 JX-074 # 12 JX-075) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	941	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-076 # 2 JX-077 # 3 JX-078 # 4 JX-079A # 5 JX-079B # 6 JX-079C # 7 JX-079D # 8 JX-079E # 9 JX-079F # 10 JX-080 # 11 JX-081 # 12 JX-082 # 13 JX-083 # 14 JX-084 # 15 JX-085 # 16 JX-087) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	942	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 JX-088 # 2 JX-089 # 3 JX-090 # 4 JX-091 # 5 JX-092 # 6 JX-093 # 7 JX-094 # 8 JX-095 # 9 JX-096 # 10 JX-097 # 11 JX-098 # 12 JX-099 # 13 JX-100) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	943 (202 pgs; 2 docs)	Omnibus Brief (Filed By ModivCare Inc.).(Related document(s):921 Sealed Document, Brief) (Attachments: # 1 Exhibit A) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	944	Sealed Document *Statement of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Affiliates and Joinder in Debtors' Reply Brief* (Filed By First Lien Agent and Consenting Creditors). (Warren, Matthew) (Entered: 12/05/2025)

12/05/2025	945	Sealed Document *Omnibus Response of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (Filed By First Lien Agent and Consenting Creditors). (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	946	Sealed Document *Declaration of Matthew L. Warren in Support of: (I) Omnibus Response of the Consenting Creditors to the (1) Motion of the Official Committee of Unsecured Creditors for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors Estates and (II) Exclusive Settlement Authority and (2) Omnibus Motion of the Official Committee of Unsecured Creditors (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors Estates and (B) Exclusive Settlement Authority ; and (ii) Statement of the Consenting Creditors in Support of Confirmation of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and Joinder in Debtors Reply Brief* (Filed By First Lien Agent and Consenting Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N # 15 Exhibit O # 16 Exhibit P # 17 Exhibit Q # 18 Exhibit R # 19 Exhibit Y # 20 Exhibit AA # 21 Exhibit BB) (Warren, Matthew) (Entered: 12/05/2025)
12/05/2025	947 (1 pg)	MOTION to Appear Pro Hac Vice for Drew S. McGehrin (Fee Paid: $100, receipt number A26717997) Filed by Creditor The Chubb Companies (Billingsley, James) (Main Document 947 replaced on 12/8/2025) (AkeitaHouse). (Entered: 12/05/2025)
12/05/2025	948 (8 pgs)	Objection *Global Medical Response, Inc.s Objection to the Debtors Notice of Cure Amount*. Filed by Global Medical Response, Inc. (Muhammad, Arsalan) (Entered: 12/05/2025)
12/05/2025	949	Sealed Document *Appendix of Exhibits Cited in Debtors Omnibus Brief (A) In Support of Plan Confirmation and (B) Objecting to Committees Motions for Standing to Pursue Claims and Lien Challenges* (Filed By ModivCare Inc.). (Attachments: # 1 001 # 2 002 # 3 003 # 4 004 # 5 005 # 6 006 # 7 007 # 8 008 # 9 009 # 10 010 # 11 011 # 12 012 # 13 013 # 14 014 # 15 015 # 16 016 # 17 017 # 18 018 # 19 019 # 20 020 # 21 021 # 22 022 # 23 023 # 24 024 # 25 025 # 26 026 # 27 027 # 28 028 # 29 029 # 30 030 # 31 031 # 32 032 # 33 033 # 34 034 # 35 035 # 36 036 # 37 037 # 38 038 # 39 039 # 40 040 # 41 041 # 42 042 # 43 043 # 44 044 # 45 045 # 46 046 # 47 047 # 48 048 # 49 049 # 50 050 # 51 051 # 52 052 # 53 053) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	950 (2598 pgs; 26 docs)	Additional Attachments Re: *Appendix of Exhibits Cited in Debtors Omnibus Brief (A) In Support of Plan Confirmation and (B) Objecting to Committees Motions for Standing to Pursue Claims and Lien*

		Challenges (related document(s):943 Brief) (Filed By ModivCare Inc.).(Related document(s):943 Brief) (Attachments: # 1 001 # 2 002 # 3 003 # 4 004 # 5 006 # 6 007 # 7 008 # 8 009 # 9 010 # 10 011 # 11 012 # 12 013 # 13 014 # 14 015 # 15 016 # 16 020 # 17 021 # 18 026 # 19 027 # 20 031 # 21 032 # 22 033 # 23 034 # 24 039 # 25 045) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	951	Sealed Document / *The Official Committee of Unsecured Creditors' Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 41 # 2 Exhibit 42 # 3 Exhibit 43 # 4 Exhibit 44 # 5 Exhibit 45 # 6 Exhibit 46 # 7 Exhibit 52 # 8 Exhibit 53 # 9 Exhibit 54 # 10 Exhibit 55 # 11 Exhibit 56 # 12 Exhibit 57 # 13 Exhibit 58 # 14 Exhibit 59 # 15 Exhibit 60 # 16 Exhibit 61 # 17 Exhibit 62 # 18 Exhibit 63 # 19 Exhibit 64 # 20 Exhibit 65 # 21 Exhibit 66 # 22 Exhibit 67 # 23 Exhibit 68 # 24 Exhibit 69 # 25 Exhibit 70) (Koster, Charles) (Entered: 12/05/2025)
12/05/2025	952 (42 pgs)	Declaration re: *Declaration of Zul Jamal in Support of Confirmation of the Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 921 Sealed Document, Brief) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	953 (26 pgs)	Declaration re: *Declaration of Chad J. Shandler in Support of Confirmation of the Debtors' Proposed Plan of Reorganization* (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 921 Sealed Document, Brief) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	954 (4 pgs)	Objection *Molina Healthcare, Inc.'s Limited Objection to Debtors' Notice of Potential Assumption of Certain of Debtors' Executory Contracts*. Filed by Molina Healthcare, Inc. (Jun, Catherine) (Entered: 12/05/2025)
12/05/2025	955 (1 pg)	Notice *of Withdrawal*. (Related document(s):747 Document) Filed by The Ronald McDonald House Entities (bmn4) (Entered: 12/05/2025)
12/05/2025	956 (5 pgs)	Notice *of Filing of Corrected Exhibit A to Declaration of Zul Jamal in Support of the Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):952 Declaration) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	957 (91 pgs)	Statement / *White & Case LLP's Third Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 to and including November 30, 2025* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 12/05/2025)
12/05/2025	958 (1927 pgs; 44 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-004 # 2 DX-005 # 3 DX-006 # 4 DX-007 # 5 DX-008 # 6 DX-009 # 7 DX-010 # 8 DX-012 # 9 DX-013 # 10 DX-014 # 11 DX-015 # 12 DX-019 # 13 DX-051 # 14 DX-052 # 15 DX-053 # 16 DX-054 # 17 DX-055 # 18 DX-056 # 19 DX-057 # 20 DX-059 # 21 DX-068 # 22 DX-070 # 23 DX-071 # 24 DX-238 # 25 DX-246 # 26 DX-247 # 27 DX-257 # 28 DX-258 # 29 DX-259 # 30 DX-263 # 31 DX-266 # 32 DX-270 # 33 DX-281 # 34 DX-282 # 35 DX-283 # 36 DX-284 # 37 DX-308 #

		38 DX-310 # 39 DX-337 # 40 DX-339 # 41 DX-345 # 42 DX-346 # 43 DX-347) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	959 (70 pgs)	Second Amended Chapter 11 Plan Filed by ModivCare Inc.. (Related document(s):119 Chapter 11 Plan) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	960 (96 pgs)	Notice *of Filing of Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):959 Amended Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	961 (263 pgs)	Notice *of Filing of Third Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	962 (104 pgs)	Proposed Order RE: *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (Filed By ModivCare Inc.).(Related document(s):959 Amended Chapter 11 Plan) (Davidson, Timothy) (Entered: 12/05/2025)
12/05/2025	979 (4 pgs)	Invoice for Claim re: 670 Objection to Claim Number by Claimant / Debtors' Omnibus Objection to Certain Proofs of Claim by Cherese Jackson (anc4) (Entered: 12/08/2025)
12/06/2025	963 (8 pgs; 2 docs)	Motion to Seal / *The Official Committee of Unsecured Creditors' Motion to File Certain Sensitive Information Contained in Supplemental Declarations Under Seal for the Duration of the Chapter 11 Cases* Filed by Creditor Committee Official Committee Of Unsecured Creditors (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 12/06/2025)
12/06/2025	964	Sealed Document / *Second Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of the Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors). (Pesce, Gregory) (Entered: 12/06/2025)
12/06/2025	965 (9 pgs)	Declaration re: / *Second Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of the Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):593 Declaration, 616 Order on Application to Employ, 964 Sealed Document) (Pesce, Gregory) (Entered: 12/06/2025)
12/06/2025	966 (19 pgs)	Certificate *of Service re: Documents Served on December 2, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):877 Witness List, Exhibit List, 879 Generic

		Motion, 880 Notice, 886 Statement, 888 Motion to Seal) (Gershbein, Evan) (Entered: 12/06/2025)
12/06/2025	967 (16 pgs)	BNC Certificate of Mailing. (Related document(s):898 Transcript) No. of Notices: 104. Notice Date 12/06/2025. (Admin.) (Entered: 12/06/2025)
12/07/2025	968 (14 pgs)	Agenda for Hearing on 12/8/2025 (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/07/2025)
12/07/2025	969 (3 pgs)	Notice of Appearance and Request for Notice Filed by Sean B Davis Filed by on behalf of Waystar, Inc. (Davis, Sean) (Entered: 12/07/2025)
12/07/2025	970 (7 pgs; 2 docs)	Response (Filed By Waystar, Inc.).(Related document(s):605 Notice) (Attachments: # 1 Proposed Order) (Davis, Sean) (Entered: 12/07/2025)
12/07/2025	971 (14 pgs)	Certificate *of Service re: Documents Served on or Before December 6, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):916 Declaration, 943 Brief, 952 Declaration, 953 Declaration, 956 Notice, 958 Exhibit List, 959 Amended Chapter 11 Plan, 960 Notice, 961 Notice, 962 Proposed Order) (Gershbein, Evan) (Entered: 12/07/2025)
12/07/2025	972 (9 pgs)	Certificate *of Service re: Debtors Agenda of Matters Set for Hearing on December 8, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):968 Agenda) (Gershbein, Evan) (Entered: 12/07/2025)
12/07/2025	973 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the December 3, 2025 Status Conference before Judge Alfredo R. Perez. Court Reporter/Transcriber: Access Transcripts (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Access Transcripts on 12/08/2025. Estimated completion date: 12/09/2025. Modified on 12/8/2025 (smg4). (Entered: 12/07/2025)
12/07/2025	974 (32 pgs)	Reply */ The Official Committee of Unsecured Creditors' Reply in Further Support of Its Motion for (I) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Uptier Transaction Claims and Causes of Action on Behalf of the Debtors' Estates and (II) Exclusive Settlement Authority* (related document(s):732 Generic Motion). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/07/2025)
12/07/2025	975 (17 pgs)	Reply */ Official Committee of Unsecured Creditors' Reply in Support of Omnibus Motion (I) Objecting to Claims and (II) for (A) Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Lien Challenge Claims Causes of Action on Behalf of the Debtors' Estates and (B) Exclusive Settlement Authority* (related document(s):733 Generic Motion). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/07/2025)
12/08/2025	976	Sealed Document */ Debtors' Second Amended Exhibit List for the Confirmation Hearing*, Exhibit List (Filed By ModivCare Inc.).

		(Attachments: # 1 DX-350 # 2 DX-351) (Davidson, Timothy) (Entered: 12/08/2025)
12/08/2025	977 (41 pgs; 2 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-350) (Davidson, Timothy) (Entered: 12/08/2025)
12/08/2025	978 (51 pgs; 3 docs)	Exhibit List (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 228 # 2 Exhibit 229) (Koster, Charles) (Entered: 12/08/2025)
12/08/2025	980	Sealed Document / *The Official Committee of Unsecured Creditors' First Amended Exhibit List for the Confirmation Hearing Scheduled to Begin on December 8, 2025 at 9:00 a.m. (Prevailing Central Time)* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit 229) (Koster, Charles) (Entered: 12/08/2025)
12/08/2025	981 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the December 8-10, 2025 Confirmation Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded hearing request for 12/8/2025 on 12/9/2025. Estimated completion date: 12/10/2025. Modified on 12/9/2025 (smg4). (Entered: 12/08/2025)
12/08/2025	982 (1 pg)	Order Granting Motion for Drew McGehrin To Appear pro hac vice (Related Doc # 947) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/8/2025. (abh4) (Entered: 12/08/2025)
12/08/2025	983 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 am to 10:45 am; 11:00 am to 12:00 pm; 1:00 pm to 2:25 pm; 2:34 pm to 3:44 pm; 3:59 pm to 5:08 pm. Appearances: see log. Additional appearances: Ray Schrock, Jamie Wine, Keith Simon, Tad Davidson, Elizabeth "Betsy" Marks, Craig Stanfield, George Kildonas, Alea Kennedy, Cherese Jackson, Deborah "Debbie" Newman, Chad Shandler, Heath Sampson, and Faisal Khan. Sworn and testified witnesses: Leslie Norwalk, Kenneth Shepard, and Daniel "Dan" Silvers. Admitted exhibits: ECF Nos. 936-5 (JX-18), 938-3 (JX-24), and 927-21 (DX-21). Confirmation and Motion hearing held. Oral argument heard. This matter is continued to 12/9/25 at 8:30 am. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) **Hearing scheduled for 12/9/2025 at 08:30 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 12/08/2025)
12/08/2025	984 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 9:00:34 AM]. File Size [49972 KB]. Run Time [01:44:07]. (admin). (Entered: 12/08/2025)
12/08/2025	985 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 11:00:11 AM]. File Size [28414 KB]. Run Time [00:59:12]. (admin). (Entered: 12/08/2025)
12/08/2025	986 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 1:00:02 PM]. File Size [40240 KB]. Run Time [01:23:50]. (admin).

		(Entered: 12/08/2025)
12/08/2025	987 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 2:34:09 PM]. File Size [32752 KB]. Run Time [01:08:14]. (admin). (Entered: 12/08/2025)
12/08/2025	988 (1 pg)	PDF with attached Audio File. Court Date & Time [12/8/2025 3:59:09 PM]. File Size [33048 KB]. Run Time [01:08:51]. (admin). (Entered: 12/08/2025)
12/08/2025	989 (3573 pgs; 5 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-352 # 2 DX-353 # 3 DX-354 # 4 DX-355) (Davidson, Timothy) (Entered: 12/08/2025)
12/09/2025	990 (38 pgs)	Exhibit List (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	991 (10 pgs)	Notice *of Filing of Unopposed DX List in Connection With Hearing to Consider Confirmation of Debtors' Plan*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	992 (9 pgs)	Certificate *of Service re: 1) Debtors Third Amended Exhibit List for the Confirmation Hearing; 2) Debtors Fourth Amended Exhibit List for the Confirmation Hearing; and 3) Notice of Filing of Unopposed DX List in Connection with Hearing to Consider Confirmation of Debtors Plan* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):989 Exhibit List, 990 Exhibit List, 991 Notice) (Gershbein, Evan) (Entered: 12/09/2025)
12/09/2025	993 (5 pgs)	Declaration re: */ Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* (Filed By ModivCare Inc.).(Related document(s):465 Amended Chapter 11 Plan, 916 Declaration, 959 Amended Chapter 11 Plan) (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	994 (43 pgs; 2 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-356) (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	995 (19 pgs; 2 docs)	Notice *of Filing of Unopposed CX List in Connection with the Confirmation Hearing*. Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A - Unopposed CX List) (Koster, Charles) (Entered: 12/09/2025)
12/09/2025	996 (24 pgs; 2 docs)	Transcript RE: Status Conference held on 12/03/25 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/9/2026. (AccessTranscripts) (Entered: 12/09/2025)
12/09/2025	997 (2 pgs)	Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief (Related Doc #

		722), Signed on 12/9/2025. (abh4) (Entered: 12/09/2025)
12/09/2025	998 (1 pg)	Letter from John Behnken, Jr (bmn4) (Entered: 12/09/2025)
12/09/2025	999 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 am to 10:20 am; 10:31 am to 11:51 am; 1:00 pm to 3:00 pm; 3:15 pm to 3:57 pm; 4:11 pm to 4:36 pm. Appearances: see log. Additional appearances: Elizabeth "Betsy" Marks, Jamie Wine, George Klidonas, Keith Simon, Tad Davidson, and Kamali Houston. Sworn and testified witnesses: James Lee, Chad Shandler, and Zul Jamal. Admitted exhibits: ECF No.: 990-1 through 990-85; 990-87 and 990-88 not for the truth of the matter; 991 (Exhibit A: except for the caveats previously discussed between the parties); 933-14 (DX-277); 993 (DX-356) subject to cross examination; 995 (CX-1 through CX-229 with the exception of the caveats previously discussed between the parties). Confirmation and Motion hearing held. Oral argument heard. Debtor is to file a supplemental declaration that reflects to the extent a claim was paid prior to the record voting date, and they voted to remove the claim. This matter is continued until 12/10/25 at 9:00 am. Closing arguments will be tentatively scheduled on 12/11/2025 at 2:00 pm. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) Hearing scheduled for 12/10/2025 at 09:00 AM at Houston, Courtroom 400 (ARP). (abh4) (Entered: 12/09/2025)
12/09/2025		Hearing Set On (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) **Hearing scheduled for 12/11/2025 at 02:00 PM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 12/09/2025)
12/09/2025	1000 (17 pgs; 6 docs)	First Application for Compensation / *White & Case LLP's First Interim Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including November 30, 2025* for White & Case LLP, Attorney, Period: 9/9/2025 to 11/30/2025, Fee: $10,778,971, Expenses: $146,980.24. Objections/Request for Hearing Due in 21 days. Filed by Attorney White & Case LLP (Attachments: # 1 Proposed Order # 2 Exhibit A # 3 Exhibit B # 4 Exhibit C # 5 Exhibit D) (Koster, Charles) (Entered: 12/09/2025)
12/09/2025	1001 (3 pgs)	Notice of Appearance and Request for Notice Filed by Simon Richard Mayer Filed by on behalf of National Specialty Insurance Company (Mayer, Simon) (Entered: 12/09/2025)
12/09/2025	1002 (21 pgs; 4 docs)	*Withdrawn* Application for Administrative Expenses *under 11 U.S.C. 503(b)(1)*. Objections/Request for Hearing Due in 21 days. Filed by Creditor National Specialty Insurance Company (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Proposed Order) (Mayer, Simon)Modified on 1/16/2026 (tjl4). (Entered: 12/09/2025)
12/09/2025	1003 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 8:30:02 AM]. File Size [52608 KB]. Run Time [01:49:36]. (admin). (Entered: 12/09/2025)
12/09/2025	1004 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 10:31:20 AM]. File Size [37695 KB]. Run Time [01:18:32].

		(admin). (Entered: 12/09/2025)
12/09/2025	1005 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 1:00:00 PM]. File Size [57735 KB]. Run Time [02:00:17]. (admin). (Entered: 12/09/2025)
12/09/2025	1006 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 3:15:01 PM]. File Size [20077 KB]. Run Time [00:41:50]. (admin). (Entered: 12/09/2025)
12/09/2025	1007 (1 pg)	PDF with attached Audio File. Court Date & Time [12/9/2025 4:11:44 PM]. File Size [11621 KB]. Run Time [00:24:13]. (admin). (Entered: 12/09/2025)
12/09/2025	1008 (3738 pgs; 14 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-357 # 2 DX-358 # 3 DX-359 # 4 DX-360 (Part 1 of 7) # 5 DX-360 (Part 2 of 7) # 6 DX-360 (Part 3 of 7) # 7 DX-360 (Part 4 of 7) # 8 DX-360 (Part 5 of 7) # 9 DX-360 (Part 6 of 7) # 10 DX-360 (Part 7 of 7) # 11 DX-361 # 12 DX-363 # 13 DX-364) (Davidson, Timothy) (Entered: 12/09/2025)
12/09/2025	1009	Sealed Document , Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-362) (Davidson, Timothy) (Entered: 12/09/2025)
12/10/2025	1010 (6 pgs)	Notice *of Filing of DX List in Connection with Hearing to Consider Confirmation of Debtors' Plan*. Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/10/2025)
12/10/2025	1011 (22 pgs)	Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors' Insurance Programs, Signed on 12/10/2025 (Related document(s):868 Stipulation) (abh4) (Entered: 12/10/2025)
12/10/2025	1012 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 am to 10:43 am; 11:00 am to 12:21 pm; 1:30 pm to 2:57 pm; 3:05 pm to 3:13 pm. Appearances: see log. Sworn and testified witnesses: Greg Magrisi and Marc Brown. Admitted exhibits: ECF No.: 990 (JX-89 through JX-100). Confirmation and Motion hearing held. Oral argument heard. This matter is continued until 12/11/25 at 2:00 pm. ERO: yes. (Related document(s):445 Plan, 728 Motion, 729 Motion) (abh4) ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) (abh4)Modified on 12/11/2025 (abh4). (Entered: 12/10/2025)
12/10/2025	1013 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 9:00:44 AM]. File Size [48329 KB]. Run Time [01:40:41]. (admin). (Entered: 12/10/2025)
12/10/2025	1014 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 11:00:06 AM]. File Size [38387 KB]. Run Time [01:19:58]. (admin). (Entered: 12/10/2025)

12/10/2025	1015 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 1:30:17 PM]. File Size [41323 KB]. Run Time [01:26:05]. (admin). (Entered: 12/10/2025)
12/10/2025	1016 (1 pg)	PDF with attached Audio File. Court Date & Time [12/10/2025 3:05:49 PM]. File Size [3310 KB]. Run Time [00:06:54]. (admin). (Entered: 12/10/2025)
12/10/2025	1017	Sealed Motion / *Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Term Sheet and Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/10/2025)
12/10/2025	1018 (5 pgs)	Declaration re: *Second Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc.* (Filed By ModivCare Inc.).(Related document(s):916 Declaration, 993 Declaration) (Davidson, Timothy) (Entered: 12/10/2025)
12/10/2025	1019 (43 pgs)	Notice / *The Official Committee of Unsecured Creditors' Deposition Designations of David Mounts Gonzales, Heath Sampson, Barbara Gutierrez, and Scott A. Kern*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1020	Sealed Document / *The Official Committee of Unsecured Creditors' Deposition Designations of David Mounts Gonzales, Heath Sampson, Barbara Gutierrez, and Scott A. Kern [Exhibits B-F]* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit B - Gonzales Deposition Transcript Vol. I # 2 Exhibit C - Gonzales Deposition Transcript Vol. II # 3 Exhibit D - Sampson Deposition Transcript # 4 Exhibit E - Gutierrez Deposition Transcript # 5 Exhibit F - Kern Deposition Transcript) (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1021 (283 pgs; 2 docs)	Transcript RE: Motion Hearing and Confirmation Day One held on December 8, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/10/2026. (mhen) (Entered: 12/10/2025)
12/10/2025	1022 (43 pgs)	Notice *of Filing of Demonstratives to the Confirmation Hearing*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1023 (56 pgs)	Notice / *The Official Committee of Unsecured Creditors' Deposition Designations of Daniel B. Silvers*. Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/10/2025	1024 (15 pgs)	Certificate *of Service re: 1) Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; 2) Debtors Fourth Amended* 002281

		Exhibit List for the Confirmation Hearing; and 3) Order (A) Extending the Time Period Within Which the Debtors May Remove Actions; and (B) Granting Related Relief (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):993 Declaration, 994 Exhibit List, 997 Order on Motion to Extend Time) (Gershbein, Evan) (Entered: 12/10/2025)
12/10/2025	1025 (19 pgs)	Certificate *of Service re: 1) Debtors Fifth Amended Exhibit List for the Confirmation Hearing; 2) Notice of Filing of DX List in Connection with Hearing to Consider Confirmation of Debtors Plan; 3) Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors Insurance Programs; and 4) Second Supplemental Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1008 Exhibit List, 1010 Notice, 1011 Generic Order, 1018 Declaration) (Gershbein, Evan) (Entered: 12/10/2025)
12/10/2025	1026 (43 pgs)	Amended Notice *of Filing Demonstratives to the Confirmation Hearing*. (Related document(s):1022 Notice) Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 12/10/2025)
12/11/2025	1027 (12 pgs; 2 docs)	Emergency Motion */ Debtors' Emergency Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Term Sheet and Granting Related Relief* Filed by Debtor ModivCare Inc. Hearing scheduled for 12/11/2025 at 02:00 PM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1028 (9 pgs; 2 docs)	Motion to Seal */ Motion of Debtors to File Exit Financing Term Sheet and Confidential Information Related Thereto Contained in the Motion to Enter Into and Perform Under the Exit Financing Term Sheet Under Seal* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1029 (7 pgs)	Response (Filed By The Chubb Companies).(Related document(s):790 Objection) (Billingsley, James) (Entered: 12/11/2025)
12/11/2025	1030 (29 pgs)	Notice *of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan, 961 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1031 (1 pg)	PDF with attached Audio File. Court Date & Time [12/11/2025 11:35:04 AM]. File Size [569 KB]. Run Time [00:01:11]. (admin). (Entered: 12/11/2025)
12/11/2025	1032	Sealed Document */ Notice of Filing of Debtors' Demonstrative from Confirmation Hearing* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/11/2025)

12/11/2025	1033 (1 pg)	Order Deeming Proof of Claim (ECF No. 563-1) Filed by Peggy Aaron as Timely Filed (Related Doc # 563), Signed on 12/11/2025. (abh4) (Entered: 12/11/2025)
12/11/2025	1034 (73 pgs; 3 docs)	Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 DX-365 # 2 DX-366) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1035 (148 pgs; 2 docs)	Proposed Order RE: *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (Filed By ModivCare Inc.).(Related document(s):959 Amended Chapter 11 Plan, 962 Proposed Order) (Attachments: # 1 Redline) (Davidson, Timothy) (Entered: 12/11/2025)
12/11/2025	1036	Courtroom Minutes. Time Hearing Held: 11:35 am to 11:37 am. Appearances: Brandon Bell. No additional appearances. Motion hearing held. Debtor is unopposed to motion 563. The Court rules the proof of claim is deemed timely filed. ERO: yes. (Related document(s):563 Motion to Extend Time) (abh4) (Entered: 12/11/2025)
12/11/2025	1037 (289 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Two held on December 9, 2025 before Judge Christopher M. Lopez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/11/2026. (mhen) (Entered: 12/11/2025)
12/11/2025	1038 (289 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Two held on December 9, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/11/2026. (mhen) (Entered: 12/11/2025)
12/11/2025	1039 (1 pg)	Courtroom Minutes. Time Hearing Held: 2:02 pm to 2:57 pm; 3:08pm to 6:03 pm. Appearances: see log. Additional appearances: George Klidonas, Ray Schrock, Jamie Wine, Keith Simon, Elizabeth "Betsy" Marks, Christopher "Chris" Shore, and Jonathan John Weichselbaum. Admitted exhibits: ECF No.: 1034-1 and 1034-2.Confirmation and Motion hearing held. Closing argument heard. Motion 1027 is approved on the record, debtor is to upload an order. The confirmation hearing is continue 12/12/2025 at 11:00 am. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document, 1027 Emergency Motion (with hearing date)) **Hearing scheduled for 12/12/2025 at 11:00 AM at telephone and video conference.** (abh4)Modified on 12/11/2025 (abh4). (Entered: 12/11/2025)
12/11/2025	1040 (2 pgs)	Order Granting Motion of Debtors to File Exit Financing Term Sheet and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Term Sheet Under Seal, Signed on 12/11/2025 (Related document(s):1027 Emergency

		Motion (with hearing date), 1028 Motion to Seal) (abh4) (Entered: 12/11/2025)
12/11/2025	1041 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the December 11, 2025 Confirmation Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 12/12/2025. Estimated completion date: 12/13/2025. Modified on 12/12/2025 (amp4). (Entered: 12/11/2025)
12/11/2025	1042 (1 pg)	PDF with attached Audio File. Court Date & Time [12/11/2025 2:02:38 PM]. File Size [25681 KB]. Run Time [00:53:30]. (admin). (Entered: 12/11/2025)
12/11/2025	1043 (1 pg)	PDF with attached Audio File. Court Date & Time [12/11/2025 3:08:06 PM]. File Size [83024 KB]. Run Time [02:52:58]. (admin). (Entered: 12/11/2025)
12/11/2025	1044	Sealed Document */ Notice of Filing of Debtors' Opening Statement and Closing Statement Demonstratives from Confirmation Hearing* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/11/2025)
12/12/2025	1045 (57 pgs; 2 docs)	Notice *of Filing of the Official Committee of Unsecured Creditors' Closing Statement Demonstrative From the Confirmation Hearing*. Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A) (Koster, Charles) (Entered: 12/12/2025)
12/12/2025	1046 (2 pgs)	Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code (Related Doc # 16, 59, 388, 412, 579,745), Signed on 12/12/2025. (abh4) (Entered: 12/12/2025)
12/12/2025	1047 (1 pg)	Courtroom Minutes. Time Hearing Held: 11:00 am to 11:27 am. Appearances: see log. Additional appearances: George Klidonas, Jamie Wine, and Ray Schrock. Confirmation and Emergency Motion hearing held. The Court confirms the plan for the reasons states on the record. Parties are to confer on an agreed order. If an agreement can not be reached, the parties may file their own orders and the court will decide. ERO: yes. (Related document(s):445 Amended Chapter 11 Plan, 728 Sealed Motion, 729 Sealed Document) (abh4) (Entered: 12/12/2025)
12/12/2025	1048 (1 pg)	PDF with attached Audio File. Court Date & Time [12/12/2025 11:02:34 AM]. File Size [11384 KB]. Run Time [00:23:43]. (admin). (Entered: 12/12/2025)
12/12/2025	1049 (3 pgs)	Order Authorizing the Debtors to Enter into and Perform Under the Exit Financing Term Sheet and Granting Related Relief, Signed on 12/12/2025 (Related document(s):1017 Sealed Motion, 1027 Emergency Motion (with hearing date)) (abh4) (Entered: 12/12/2025)
12/13/2025	1050 (206 pgs; 2 docs)	Transcript RE: Confirmation and Motion Hearing Day Three held on December 10, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037,

		ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/13/2026. (mhen) (Entered: 12/13/2025)
12/13/2025	1051 (17 pgs)	BNC Certificate of Mailing. (Related document(s):996 Transcript) No. of Notices: 106. Notice Date 12/13/2025. (Admin.) (Entered: 12/14/2025)
12/13/2025	1052 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1021 Transcript) No. of Notices: 106. Notice Date 12/13/2025. (Admin.) (Entered: 12/14/2025)
12/14/2025	1053 (152 pgs; 3 docs)	Proposed Order Submission After Hearing (Filed By ModivCare Inc.). (Related document(s):959 Amended Chapter 11 Plan, 962 Proposed Order, 1035 Proposed Order) (Attachments: # 1 Full Redline # 2 Changed-Page Only Redline) (Davidson, Timothy) (Entered: 12/14/2025)
12/15/2025	1054 (1 pg)	Order Conditionally Granting the Motions to Extend the Deadline to File an Objection to the Assumption Notices, Signed on 12/15/2025 (Related document(s):752 Motion to Extend Time, 754 Generic Motion, 755 Generic Motion, 756 Generic Motion, 759 Generic Motion, 760 Generic Motion, 761 Motion to Extend Time, 762 Generic Motion, 764 Motion to Extend Time, 765 Generic Motion, 767 Generic Motion, 768 Generic Motion, 769 Motion to Extend Time, 771 Motion to Extend Time, 772 Generic Motion, 774 Motion to Extend Time, 775 Generic Motion, 776 Generic Motion) (abh4) (Entered: 12/15/2025)
12/15/2025	1055 (107 pgs)	Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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, Signed on 12/15/2025 (Related document(s):959 Amended Chapter 11 Plan, 1053 Proposed Order Submission After Hearing (Greensheet)) (abh4) (Entered: 12/15/2025)
12/15/2025	1056 (2 pgs)	Notice *of Annual Rate Increase by Hunton Andrews Kurth LLP*. (Related document(s):503 Order on Application to Employ) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/15/2025)
12/15/2025	1057 (167 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Four held on December 11, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/16/2026. (mhen) (Entered: 12/15/2025)
12/15/2025	1058 (2 pgs)	Notice of Appearance and Request for Notice Filed by Shawn Michael Grady Filed by on behalf of Florence Speaker (Grady, Shawn) (Entered: 12/15/2025)
12/16/2025	1059 (4 pgs)	Witness List, Exhibit List (Filed By ModivCare Inc.).(Related document(s):657 Motion for Relief From Stay) (Davidson, Timothy) (Entered: 12/16/2025)

12/16/2025	1060 (3 pgs)	Withdraw Document (Filed By Hexaware Technologies Limited). (Related document(s):741 Objection) (Billingsley, James) (Entered: 12/16/2025)
12/16/2025	1061	Sealed Document / *Supplemental Declaration of Matt Lazzeri in Support of Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1062 (18 pgs)	Declaration re: / *Supplemental Declaration of Matt Lazzeri in Support of Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief* (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1063 (7 pgs)	Stipulation By ModivCare Inc. and Mary Beth Duran. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1064 (5 pgs)	Stipulation By ModivCare Inc. and Thresa Lyons, individually and as personal representative of the estate of Rosa Lyons. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/16/2025)
12/16/2025	1065 (10 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before November 25, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 605 Notice, 748 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1066 (4 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1067 (10 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before December 3, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 605 Notice, 712 Notice, 716 Order on Application to Employ, 748 Certificate, 813 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1068 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates*

		(Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1069 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before December 9, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):605 Notice, 685 Order on Motion to Extend Time, 699 Certificate, 734 Order on Application to Employ, 748 Certificate, 788 Certificate, 863 Generic Order, 889 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/16/2025	1070 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/16/2025)
12/17/2025	1071 (7 pgs)	Stipulation and Agreed Order Granting Limited Relief from Plan Injunction, Signed on 12/17/2025 (Related document(s):1063 Stipulation) (abh4) (Entered: 12/17/2025)
12/17/2025	1072 (5 pgs)	Agreed Order and Stipulation Resolving Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors, Signed on 12/17/2025 (Related document(s):471 Motion and 1064 Stipulation) (abh4) (Entered: 12/17/2025)
12/17/2025	1073 (9 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Extending the Exclusive Periods to File and Solicit a Plan* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/17/2025)
12/17/2025	1074 (1 pg)	MOTION to Appear Pro Hac Vice for Brad Lenox (Fee Paid: $100, receipt number A26758435) Filed by Creditor The Chubb Companies (Lenox, Bradley) (Entered: 12/17/2025)
12/17/2025	1075 (18 pgs)	Certificate *of Service re: Documents Served on or Before December 12, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1030 Notice, 1034 Exhibit List, 1035 Proposed Order, 1040 Generic Order) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1076 (8 pgs)	Certificate *of Service re: 1) Order Extending the Time for Debtors to Comply with Section 345(b) of the Bankruptcy Code; and 2) Order Authorizing the Debtors to Enter Into and Perform Under the Exit Financing Term Sheet and Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1046 Generic Order, 1049 Generic Order) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1077 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on December 12, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):128 Certificate, 352 Certificate, 394 Generic Order, 443 Certificate, 507 Order on Motion to Reject Lease or Executory Contract, 564 Certificate, 685 Order on

		Motion to Extend Time, 699 Certificate) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1078 (11 pgs)	Certificate *of Service re: 1) Debtors Witness and Exhibit List; and 2) Supplemental Declaration of Matt Lazzeri in Support of Debtors Application for Entry of an Order (A) Authorizing the Retention and Employment of Ernst & Young LLP as Tax, Consulting, Accounting and Valuation Services Provider to the Debtors and Debtors in Possession as of the Petition Date; and (B) Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1059 Witness List, Exhibit List, 1062 Declaration) (Gershbein, Evan) (Entered: 12/17/2025)
12/17/2025	1079 (3 pgs)	Declaration re: */ Third Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors). (Related document(s):593 Declaration, 616 Order on Application to Employ, 965 Declaration) (Pesce, Gregory) (Entered: 12/17/2025)
12/17/2025	1080 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1037 Transcript) No. of Notices: 106. Notice Date 12/17/2025. (Admin.) (Entered: 12/17/2025)
12/17/2025	1081 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1038 Transcript) No. of Notices: 106. Notice Date 12/17/2025. (Admin.) (Entered: 12/17/2025)
12/17/2025	1082 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1050 Transcript) No. of Notices: 106. Notice Date 12/17/2025. (Admin.) (Entered: 12/17/2025)
12/18/2025	1083 (1 pg)	Order Granting Motion for Brad Lenox To Appear pro hac vice (Related Doc # 1074) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 12/18/2025. (abh4) (Entered: 12/18/2025)
12/18/2025	1084 (1 pg)	Courtroom Minutes. Time Hearing Held: 11:02 am to 11:10 am. Appearances: see log. Additional appearances: Lisa Sallaj. Motion hearing held. Oral argument heard. This matter is continued to 1/29/2026 at 11:00 am. The parties are encouraged to confer upon an agreed order. To the extent an agreement is reached, the debtor may upload an agreed order. The stay will remain in effect. ERO: yes. (Related document(s):657 Motion for Relief From Stay, 663 Generic Application) **Hearing scheduled for 1/29/2026 at 11:00 AM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 12/18/2025)
12/18/2025	1085 (1 pg)	PDF with attached Audio File. Court Date & Time [12/18/2025 11:02:31 AM]. File Size [3272 KB]. Run Time [00:06:49]. (admin). (Entered: 12/18/2025)

12/18/2025	1086 (68 pgs)	Statement / *Third Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2025 through November 30, 2025* (Filed By AlixPartners, LLP). (Koster, Charles) (Entered: 12/18/2025)
12/18/2025	1087 (24 pgs)	Certificate *of Service re: 1) Order Conditionally Granting the Motions to Extend the Deadline to File an Objection to the Assumption Notices; 2) Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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; and 3) Notice of Annual Rate Increase by Hunton Andrews Kurth LLP* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1054 Generic Order, 1055 Order Confirming Chapter 11 Plan, 1056 Notice) (Gershbein, Evan) (Entered: 12/18/2025)
12/18/2025	1088 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1057 Transcript) No. of Notices: 106. Notice Date 12/18/2025. (Admin.) (Entered: 12/18/2025)
12/19/2025	1089 (5 pgs)	Stipulation By ModivCare Inc. and Florence Speaker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 12/19/2025)
12/19/2025	1090 (3 pgs)	Notice *of Annual Rate Increase by Latham & Watkins LLP*. (Related document(s):502 Order on Application to Employ) Filed by Latham & Watkins LLP (Davidson, Timothy) (Entered: 12/19/2025)
12/22/2025	1091 (2 pgs)	Order Granting Debtors' Motion to File Under Seal Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors' Insurance Programs (Related Doc # 869), Signed on 12/22/2025. (abh4) (Entered: 12/22/2025)
12/22/2025	1092 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Florence Speaker, Signed on 12/22/2025 (Related document(s):1089 Stipulation) (abh4) (Entered: 12/22/2025)
12/22/2025	1093 (13 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Limited Relief from Plan Injunction; 2) Agreed Order and Stipulation Resolving Motion of Thresa Lyons for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors; and 3) Debtors Motion for Entry of an Order Extending the Exclusive Periods to File and Solicit a Plan* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1071 Generic Order, 1072 Generic Order, 1073 Generic Motion) (Gershbein, Evan) (Entered: 12/22/2025)
12/22/2025	1094 (658 pgs)	Notice *of Filing of Fifth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan, 961 Notice, 1030 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/22/2025)
12/23/2025		Hearing Set by Request (Related document(s):1055 Order Confirming Chapter 11 Plan) Contacted by Tad Davidson. Movant to notice all

		interested parties and file a certificate of service with the court. **Status conference to be held on 12/23/2025 at 10:30 AM at telephone and video conference.** (tjl4) (Entered: 12/23/2025)
12/23/2025	1095 (2 pgs)	Notice *of Status Conference to be Held on December 23, 2025, at 10:30 A.M.* Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/23/2025)
12/23/2025	1096 (6 pgs)	Certificate *of Service re Notice of Status Conference to be Held on December 23, 2025, at 10:30 a.m.* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1095 Notice) (Gershbein, Evan) (Entered: 12/23/2025)
12/23/2025	1097 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by ModivCare Inc.. This is to order a transcript of Status Conference 12.23.25 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Veritext Legal Solutions (Filed By ModivCare Inc.). (Davidson, Timothy) Electronically forwarded to Veritext Legal Solutions on 12/23/25. Estimated completion date: 12/26/25. Modified on 12/23/2025 (anc4). (Entered: 12/23/2025)
12/23/2025	1098 (1 pg)	Courtroom Minutes. Time Hearing Held: 10:33 am to 10:40 am. Appearances: see log. Additional appearances: Charles Koster. Status conference held. Oral update provided to the court.ERO: yes. (Related document(s):1055 Order Confirming Chapter 11 Plan) (abh4) (Entered: 12/23/2025)
12/23/2025	1099 (1 pg)	Withdrawal of Claim: *No. 1 for Bexar County* (Stecker, Don) (Entered: 12/23/2025)
12/23/2025	1100 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $29796095 disbursed (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1101 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $888485 disbursed (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1102 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $3826597 disbursed (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1103 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $157542432 disbursed (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1104 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $45358131 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1105 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1106 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 12/23/2025)

12/23/2025	1107 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1108 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1109 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1110 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1111 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1112 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1113 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1114 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1115 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1116 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1117 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1118 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1119 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1120 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 12/23/2025)

12/23/2025	1121 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1122 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1123 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 11/30/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 12/23/2025)
12/23/2025	1124 (1 pg)	PDF with attached Audio File. Court Date & Time [12/23/2025 10:32:57 AM]. File Size [3721 KB]. Run Time [00:07:45]. (admin). (Entered: 12/23/2025)
12/23/2025	1125 (2 pgs)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Interested Party. This is to order a transcript of Bankruptcy Proceeding Held on December 12, 2025 before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Interested Party). (Carlson, Clifford) Electronically forwarded to Judicial Transcribers of Texas on 12/24/2025. Estimated completion date: 12/25/2025. Modified on 12/24/2025 (sew4). (Entered: 12/23/2025)
12/23/2025	1126 (7 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 12/23/2025)
12/23/2025	1127 (8 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before December 16, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 354 Certificate, 605 Notice, 748 Certificate) (Gershbein, Evan) (Entered: 12/23/2025)
12/23/2025	1128 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/23/2025)
12/26/2025	1129 (9 pgs; 2 docs)	Transcript RE: held on 12/23/25 before Judge ALFREDO R. PEREZ. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/26/2026. (VeritextLegalSolutions) (Entered: 12/26/2025)
12/26/2025	1130 (30 pgs)	Notice *of Filing of Sixth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates*. (Related document(s):725 Notice, 802 Notice, 959 Amended Chapter 11 Plan, 961 Notice, 1030 Notice, 1094 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/26/2025)

12/26/2025	1131 (11 pgs)	Certificate *of Service re: 1) Order Granting Debtors Motion to File Under Seal Stipulation and Agreed Order Regarding Payment of Defense Costs and Other Amounts in Connection with Debtors Insurance Programs; and 2) Stipulation and Agreed Order Granting Relief from Stay to Florence Speaker* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1091 Order on Motion to Seal, 1092 Generic Order) (Gershbein, Evan) (Entered: 12/26/2025)
12/28/2025	1132 (3 pgs)	Declaration re: */ Second Supplemental Declaration of Zul Jamal In Connection With Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date* (Filed By ModivCare Inc.).(Related document(s):504 Order on Application to Employ) (Davidson, Timothy) (Entered: 12/28/2025)
12/29/2025	1133 (14 pgs; 2 docs)	Motion */ Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/29/2025)
12/29/2025	1134 (4 pgs)	Notice *of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines With Respect to Administrative Expense and Rejection Damage Claims*. (Related document(s):959 Amended Chapter 11 Plan, 1055 Order Confirming Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 12/29/2025)
12/29/2025	1135 (2 pgs)	Order Extending Time to Assume or to Reject Unexpired Leases of Nonresidential Real Property (Related Doc # 879), Signed on 12/29/2025. (abh4) (Entered: 12/29/2025)
12/29/2025	1136 (2 pgs)	Order Granting the Motion to Seal the Letter to the Court (Related Doc # 888), Signed on 12/29/2025. (abh4) (Entered: 12/29/2025)
12/29/2025	1137 (1 pg)	Withdrawal of Claim: *No. 2 filed by City of El Paso* (Stecker, Don) (Entered: 12/29/2025)
12/29/2025	1138 (18 pgs)	Certificate *of Service re: Documents Served on December 23, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1094 Notice, 1100 Debtor-in-Possession Monthly Operating Report, 1101 Debtor-in-Possession Monthly Operating Report, 1102 Debtor-in-Possession Monthly Operating Report, 1103 Debtor-in-Possession Monthly Operating Report, 1104 Debtor-in-Possession Monthly Operating Report, 1105 Debtor-in-Possession Monthly Operating Report, 1106 Debtor-in-Possession Monthly Operating Report, 1107 Debtor-in-Possession Monthly Operating Report, 1108 Debtor-in-Possession Monthly Operating Report, 1109 Debtor-in-Possession Monthly Operating Report, 1110 Debtor-in-Possession Monthly Operating Report, 1111 Debtor-in-Possession Monthly Operating Report, 1112 Debtor-in-Possession Monthly Operating Report, 1113 Debtor-in-Possession Monthly Operating Report, 1114 Debtor-in-Possession Monthly Operating Report, 1115 Debtor-in-Possession Monthly Operating Report, 1116 Debtor-in-Possession Monthly Operating Report, 1117 Debtor-in-Possession Monthly Operating Report, 1118 Debtor-in-Possession Monthly Operating Report, 1119 Debtor-in-Possession Monthly Operating Report, 1120 Debtor-in-Possession Monthly Operating Report, 1121 Debtor-in-Possession Monthly Operating Report, 1122

		Debtor-in-Possession Monthly Operating Report, 1123 Debtor-in-Possession Monthly Operating Report) (Gershbein, Evan) (Entered: 12/29/2025)
12/30/2025	1139 (3 pgs)	Notice *of Withdrawal of Objection to Debtors' "Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases (Doc. 605)" (Related to Doc. No 736)*. Filed by Administrative Services Cooperative, Inc. (Conley, Phillip) (Entered: 12/30/2025)
12/30/2025	1140 (13 pgs)	Objection *to State Nationals Application for Payment of Administrative Claim* (related document(s):1002 Application for Administrative Expenses). Filed by First Lien Agent and Consenting Creditors (Warren, Matthew) (Entered: 12/30/2025)
12/30/2025	1141 (5 pgs)	Objection *// Limited Objection and Reservation of Rights of NEMT Insurance DE LLC, Series 1 to Application of National Specialty Insurance Company for Payment of Administrative Expense Claim Under 11 U.S.C. § 503(B)(1)* (related document(s):1002 Application for Administrative Expenses). Filed by NEMT Insurance DE LLC, Series 1 (Atkinson, Todd) (Entered: 12/30/2025)
12/30/2025	1142 (14 pgs; 2 docs)	Objection *to State National's Application for Payment of Administrative Claim* (related document(s):1002 Application for Administrative Expenses). Filed by ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 12/30/2025)
12/30/2025	1143 (4 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate) (Gershbein, Evan) (Entered: 12/30/2025)
12/30/2025	1144 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 12/30/2025)
12/31/2025	1145 (19 pgs; 2 docs)	Transcript RE: Confirmation and Standing Motion Hearing Day Five - Court's Ruling held on December 12, 2025 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 03/31/2026. (mhen) (Entered: 12/31/2025)
12/31/2025	1146 (17 pgs)	BNC Certificate of Mailing. (Related document(s):1129 Transcript) No. of Notices: 106. Notice Date 12/31/2025. (Admin.) (Entered: 12/31/2025)
01/01/2026	1147 (2 pgs)	Order Granting the Official Committee of Unsecured Creditors' Motion to File Certain Sensitive Information Contained in Supplemental

		Declarations Under Seal for the Duration of the Chapter 11 Cases (Related Doc # 963), Signed on 1/1/2026. (abh4) (Entered: 01/02/2026)
01/02/2026	1148 (4 pgs)	Certificate *of Service re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; and 3) Modified Official Form 410 Proof of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate) (Gershbein, Evan) (Entered: 01/02/2026)
01/02/2026	1149 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 01/02/2026)
01/04/2026	1150 (4 pgs)	BNC Certificate of Mailing. (Related document(s):1147 Order on Motion to Seal) No. of Notices: 71. Notice Date 01/04/2026. (Admin.) (Entered: 01/04/2026)
01/04/2026	1151 (1 pg)	Order Allowing Interim Compensation and Reimbursement of Expenses (Related Doc # 1000) Signed on 1/4/2026. (tjl4) (Entered: 01/05/2026)
01/05/2026		Hearing Set On (Related document(s):1002 Application for Administrative Expenses) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 1/20/2026 at 03:00 PM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 01/05/2026)
01/05/2026	1152 (17 pgs)	Certificate *of Service re: Notice of Filing of Sixth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1130 Notice) (Gershbein, Evan) (Entered: 01/05/2026)
01/05/2026	1153 (21 pgs)	Certificate *of Service re: 1) Second Supplemental Declaration of Zul Jamal in Connection with Order Authorizing the Employment and Retention of Moelis & Company LLC as Investment Banker and Placement Agent Effective as of the Petition Date; 2) Debtors Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts; 3) Order Extending Time to Assume or to Reject Unexpired Leases of Nonresidential Real Property; and 4) Order Granting the Motion to Seal the Letter to the Court* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1132 Declaration, 1133 Generic Motion, 1135 Generic Order, 1136 Order on Motion to Seal) (Gershbein, Evan) (Entered: 01/05/2026)
01/05/2026	1154 (8 pgs)	Certificate *of Service re: Objection to State Nationals Application for Payment of Administrative Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1142 Objection) (Gershbein, Evan) (Entered: 01/05/2026)
01/05/2026	1155 (7 pgs)	Notice *of Clarification Regarding Reply to Omnibus Objection*. (Related document(s):884 Reply) Filed by Alea Rachel Kennedy (anc4) (Entered: 01/06/2026)

01/06/2026	1156 (1 pg)	Withdrawal of Claim: *Claim #2128 with claim agent in the amount of $23.96* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1157 (1 pg)	Withdrawal of Claim: *Claim #2130 in the amount of $124.17 with claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1158 (1 pg)	Withdrawal of Claim: *Claim #2129 in the amount of $182.63 from claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1159 (1 pg)	Withdrawal of Claim: *Claim #56 in the amount of $102.21 from claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1160 (1 pg)	Withdrawal of Claim: *Claim #2131 in the amount of $81.30 from claim agent* (Turner, John) (Entered: 01/06/2026)
01/06/2026	1161 (5 pgs)	Stipulation By ModivCare Inc. and Lisa Sallaj. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.).(Related document(s):657 Motion for Relief From Stay, 790 Objection, 881 Response) (Davidson, Timothy) (Entered: 01/06/2026)
01/06/2026	1162 (3 pgs)	Certificate *of Service (Supplemental) re: Order Granting Motion of Debtors to File Fee and Reimbursement Letters and Confidential Information Related Thereto Contained in Motion to Enter Into and Perform Under the Exit Financing Engagement Letters Under Seal* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):874 Order on Motion to Seal, 913 Certificate) (Gershbein, Evan) (Entered: 01/06/2026)
01/07/2026	1163 (5 pgs)	Stipulation and Agreed Order Resolving Motion of Lisa Sallaj for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors, Signed on 1/7/2026 (Related document(s):657 Motion for Relief From Stay) (gc4) (Entered: 01/07/2026)
01/07/2026	1164 (2 pgs)	Notice *of Hearing*. (Related document(s):1002 Application for Administrative Expenses, Hearing (Bk)) Filed by National Specialty Insurance Company (Mayer, Simon) (Entered: 01/07/2026)
01/07/2026	1165 (3 pgs)	Affidavit Re: *Publication of the Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims in the New York Times* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice) (Gershbein, Evan) (Entered: 01/07/2026)
01/07/2026	1166 (21 pgs; 2 docs)	BNC Certificate of Mailing. (Related document(s):1145 Transcript) No. of Notices: 106. Notice Date 01/07/2026. (Admin.) Additional attachment(s) added on 1/9/2026 (rbw4) (Entered: 01/07/2026)
01/12/2026	1167 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order Resolving Motion of Lisa Sallaj for Relief from Stay and for Order Determining Inapplicability of Stay to Certain Non-Debtors* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1163 Generic Order) (Gershbein, Evan) (Entered: 01/12/2026)

01/13/2026	1168 (13 pgs; 3 docs)	Agreed Order and Certificate of Counsel (Filed By ModivCare Inc.). (Related document(s):670 Objection to Claim) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 01/13/2026)
01/14/2026	1169 (4 pgs)	Order Granting Debtors' Omnibus Objection to Certain Proofs of Claim, Signed on 1/14/2026 (Related document(s):670 Objection to Claim) (gc4) (Entered: 01/14/2026)
01/14/2026	1170 (1 pg)	Withdrawal of Claim: *No. 14 filed by Ector CAD* (Stecker, Don) (Entered: 01/14/2026)
01/14/2026	1171 (1 pg)	Withdrawal of Claim: *Modivcare Solutions, LLC - Siriuspoint America Insurance Company - Claim No. 723* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1172 (1 pg)	Withdrawal of Claim: *Modivcare, Inc. - Siriuspoint America Insurance Company - Claim No. 724* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1173 (1 pg)	Withdrawal of Claim: *Modivcare Solutions, LLC - Atlantic Specialty Insurance Company - Claim No. 725* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1174 (1 pg)	Withdrawal of Claim: *Modivcare, Inc. - Atlantic Specialty Insurance Company - Claim No. 726* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1175 (1 pg)	Withdrawal of Claim: *Ride Plus, LLC - Atlantic Specialty Insurance Company - Claim No. 727* (Williams, Scott) (Entered: 01/14/2026)
01/14/2026	1176 (1 pg)	Withdrawal of Claim: *A & B Homecare Solutions, L.L.C. - Atlantic Specialty Insurance Company - Claim No. 728* (Williams, Scott) (Entered: 01/14/2026)
01/15/2026	1177 (5 pgs)	Stipulation By ModivCare Inc. and Helen Denise Walker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/15/2026)
01/15/2026	1178 (46 pgs; 3 docs)	Statement */ Fourth Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from December 1, 2025 Through December 29, 2025* (Filed By Official Committee Of Unsecured Creditors). (Attachments: # 1 Exhibit A # 2 Exhibit B) (Koster, Charles) (Entered: 01/15/2026)

01/15/2026	1179 (6 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates; and 2) Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1030 Notice, 1055 Order Confirming Chapter 11 Plan, 1075 Certificate, 1087 Certificate) (Gershbein, Evan) (Entered: 01/15/2026)
01/16/2026	1180 (2 pgs)	Withdraw Document (Filed By National Specialty Insurance Company). (Related document(s):1002 Application for Administrative Expenses) (Mayer, Simon) (Entered: 01/16/2026)
01/16/2026	1181 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Helen Denise Walker, Signed on 1/16/2026 (Related document(s):1177 Stipulation) (tjl4) (Entered: 01/16/2026)
01/19/2026	1182 (3219 pgs)	Certificate *of Service re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice) (Gershbein, Evan) (Entered: 01/19/2026)
01/19/2026	1183 (12 pgs)	Certificate *of Service re: Order Granting Debtors' Omnibus Objection to Certain Proofs of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1169 Generic Order) (Gershbein, Evan) (Entered: 01/19/2026)
01/19/2026	1184 (6 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; 3) Modified Official Form 410 Proof of Claim; and 4) Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 01/19/2026)
01/19/2026	1185 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 01/19/2026)
01/20/2026	1186 (6 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 01/20/2026)

01/20/2026	1187 (1 pg)	MOTION to Appear Pro Hac Vice for Thomas F. Koegel (Fee Paid: $100, receipt number A26844734) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 01/20/2026)
01/20/2026	1188 (86 pgs; 15 docs)	Objection *of HealthSpring, Inc. to Debtor's Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (related document(s):1133 Generic Motion). Filed by HealthSpring, Inc. (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Declaration of Kayla McKenzie # 14 Declaration of Dana Mott) (Jones, Erin) (Entered: 01/20/2026)
01/20/2026	1189	Sealed Document *UNREDACTED Objection of HealthSpring, Inc.'s Objection to Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts and related exhibits* (Filed By HealthSpring, Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Declaration of Kayla McKenzie # 14 Declaration of Dana Mott) (Jones, Erin) (Entered: 01/20/2026)
01/20/2026	1190 (6 pgs; 2 docs)	Motion to Seal *UNREDACTED Objection of HealthSpring, Inc. to Debtor's Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts and related Exhibits - Filed Under Seal at Docket No. 1189* Filed by Interested Party HealthSpring, Inc. (Attachments: # 1 Proposed Order) (Jones, Erin) (Entered: 01/20/2026)
01/21/2026	1191 (2 pgs)	Notice *of Withdrawal of Limited Objection to Debtors' Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases*. Filed by Keystone Quality Transport, Lifestar Response of Maryland, Inc. (Conley, Phillip) (Entered: 01/21/2026)
01/21/2026	1192 (5 pgs)	*Docketed in Error. Previously filed and signed at ECF Nos. 1177, 1181 * Stipulation By ModivCare Inc. and Helen Denise Walker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy)Modified on 1/21/2026 (tjl4). (Entered: 01/21/2026)
01/21/2026	1193 (5 pgs)	Stipulation By ModivCare Inc. and Deborah Slaughter. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/21/2026)
01/21/2026	1194 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Deborah Slaughter, Signed on 1/21/2026 (Related document(s):1193 Stipulation) (gc4) (Entered: 01/21/2026)
01/21/2026	1195 (1 pg)	Order Granting Motion for Thomas F. Koegel To Appear pro hac vice (Related Doc # 1187) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 1/21/2026. (gc4) (Entered: 01/21/2026)

01/21/2026	1196 (12 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Stay to Helen Denise Walker* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1181 Generic Order) (Gershbein, Evan) (Entered: 01/21/2026)
01/23/2026		Hearing Set On (Related document(s):1133 Generic Motion) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 1/28/2026 at 08:30 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 01/23/2026)
01/26/2026		Hearing Converted to Status Conference by Agreement (Related document(s):1133 Generic Motion) Parties contacted the Case Manager. **Status conference to be held on 1/28/2026 at 08:30 AM at telephone and video conference.** (tjl4) (Entered: 01/26/2026)
01/26/2026	1197 (60 pgs)	Statement / *White & Case LLP's Fourth Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the period from December 1, 2025 to and including December 29, 2025* (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) (Entered: 01/26/2026)
01/26/2026	1198 (12 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Stay to Deborah Slaughter* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1194 Generic Order) (Gershbein, Evan) (Entered: 01/26/2026)
01/27/2026	1199 (1 pg)	MOTION to Appear Pro Hac Vice for Nimrod H. Aviad (Fee Paid: $100, receipt number A26864258) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 01/27/2026)
01/27/2026	1200 (5 pgs)	Stipulation By ModivCare Inc. and Michael Walsh. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/27/2026)
01/27/2026	1201 (31 pgs; 2 docs)	Motion *of Reorganized Debtors for Entry of an Order: (A) Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections; (B) the Form of Objection Notice; and (C) Granting Related Relief* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 01/27/2026)
01/28/2026	1202 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:45 AM. Appearances: See attached. Additional appearances: Jonathan Weichselbaum for the Debtor. ERO: Yes. Status Conference set for 2/04/2026 at 8:30 AM following filing of related documents and deposition. (Related document(s):1133 Generic Motion, 1188 Objection). **Status conference to be held on 2/4/2026 at 08:30 AM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 01/28/2026)
01/28/2026	1203 (1 pg)	PDF with attached Audio File. Court Date & Time [1/28/2026 8:30:02 AM]. File Size [7149 KB]. Run Time [00:14:54]. (admin). (Entered: 01/28/2026)

01/28/2026	1204 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Michael Walsh, Signed on 1/28/2026 (Related document(s):1200 Stipulation) (gc4) (Entered: 01/28/2026)
01/28/2026	1205 (1 pg)	Order Granting Motion for Nimrod H. Aviad To Appear pro hac vice (Related Doc # 1199) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 1/28/2026. (gc4) (Entered: 01/28/2026)
01/28/2026	1206 (7 pgs)	Notice *Regarding Status of Various Cure Objections*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 01/28/2026)
01/29/2026	1207	Courtroom Minutes. Time Hearing Held: 11:09 AM to 11:12 AM. Appearances: No appearances. ERO: Yes. Motion 663 is denied on the record without prejudice. (Related document(s):663 Generic Application) (gc4) (Entered: 01/29/2026)
01/29/2026	1208 (1 pg)	PDF with attached Audio File. Court Date & Time [1/29/2026 11:09:10 AM]. File Size [1049 KB]. Run Time [00:02:11]. (admin). (Entered: 01/29/2026)
01/29/2026	1209 (9 pgs)	Motion to Compel *Debtors to Prosecute or Resolve Claim Objection* Filed by Creditor Alea Rachel Kennedy (abh4) (Entered: 01/29/2026)
01/30/2026	1210 (1 pg)	Notice *Friendly Medical Transportation's Notice of Withdrawal of its Limited Objection to Debtors' Notice of Potential Assumption of Certain Debtors' Executory Contracts and Unexpired Leases*. (Related document(s):605 Notice, 723 Notice) Filed by Friendly Medical Transportation (McKay, Zachary) (Entered: 01/30/2026)
01/30/2026	1211 (5 pgs)	Stipulation By ModivCare Inc. and Edwin Barroso-Perez. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1212 (5 pgs)	Stipulation By ModivCare Inc. and Connie Smith. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1213 (13 pgs)	Response (Filed By ModivCare Inc.).(Related document(s):1188 Objection, 1189 Sealed Document, 1202 Courtroom Minutes) (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1214 (7 pgs)	Declaration re: */ Declaration of Kenneth Shepard in Support of Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (Filed By ModivCare Inc.).(Related document(s):1213 Response) (Davidson, Timothy) (Entered: 01/30/2026)
01/30/2026	1215 (5 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By

002301

		Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 01/30/2026)
01/30/2026	1216 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 01/30/2026)
02/02/2026	1217 (1 pg)	MOTION to Appear Pro Hac Vice for Joshua M. Robbins (Fee Paid: $100, receipt number A26882194) Filed by Interested Party HealthSpring, Inc. (Robbins, Joshua) (Entered: 02/02/2026)
02/02/2026	1218 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Edwin Barroso-Perez, Signed on 2/2/2026 (Related document(s):1211 Stipulation) (gc4) (Entered: 02/02/2026)
02/02/2026	1219 (5 pgs)	Stipulation and Agreed Order Granting Relief from Stay to Connie Smith, Signed on 2/2/2026 (Related document(s):1212 Stipulation) (gc4) (Entered: 02/02/2026)
02/02/2026	1220 (13 pgs)	Certificate *of Service re: 1) Motion of Reorganized Debtors for Entry of an Order: (A) Approving Procedures for Reorganized Debtors Filing of Omnibus Claims Objections; (B) the Form of Objection Notice; and (C) Granting Related Relief; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Michael Walsh* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1201 Generic Motion, 1204 Generic Order) (Gershbein, Evan) (Entered: 02/02/2026)
02/03/2026	1221 (1 pg)	Order Granting Motion for Joshua M. Robbins To Appear pro hac vice (Related Doc # 1217) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 2/3/2026. (gc4) (Entered: 02/03/2026)
02/03/2026	1222 (5 pgs)	Stipulation By ModivCare Inc. and Norman Fishbein. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/03/2026)
02/03/2026	1223 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $70444092 disbursed (Filed By ModivCare Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1224 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $1571363 disbursed (Filed By Higi SH LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1225 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $3457675 disbursed (Filed By Valued Relationships, Inc.). (Bell, Brandon) (Entered: 02/03/2026)

02/03/2026	1226 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $189422794 disbursed (Filed By ModivCare Solutions, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1227 (25 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $57018124 disbursed (Filed By All Metro Home Care Services of New York, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1228 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By All Metro Payroll Services Corporation). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1229 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By At-Home Quality Care, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1230 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By California MedTrans Network IPA LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1231 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By California MedTrans Network MSO LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1232 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By CareGivers America Registry, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1233 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Florida MedTrans Network LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1234 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Florida MedTrans Network MSO LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1235 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Health Trans, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1236 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Healthcom Holdings LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1237 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Higi Care Holdings, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1238 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Higi SH Holdings Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1239 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Metropolitan Medical Transportation IPA, LLC). (Bell, Brandon) (Entered: 02/03/2026)

02/03/2026	1240 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By MLA Sales, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1241 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By National MedTrans, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1242 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By OEP AM, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1243 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Provado Technologies, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1244 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Red Top Transportation, Inc.). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1245 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By TriMed, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/03/2026	1246 (12 pgs)	Debtor-In-Possession Monthly Operating Report for Filing Period ending 12/31/2025, $0 disbursed (Filed By Victory Health Holdings, LLC). (Bell, Brandon) (Entered: 02/03/2026)
02/04/2026	1247 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:57 AM. Appearances: See attached. Additional appearances: Jonathan Weichselbaum and Betsy Marks for the Debtor. ERO: Yes. Hearing for motion 1133 set for 2/13/2026 at 1:00 PM virtually. Counsel may contact the Case Manager to schedule a Status Conference on discovery issues prior to the hearing if need arises. Counsel may file a short Sur-Reply in advance of the hearing. (Related document(s):1133 Generic Motion) **Hearing scheduled for 2/13/2026 at 01:00 PM at telephone and video conference.** (gc4) (Entered: 02/04/2026)
02/04/2026	1248 (1 pg)	PDF with attached Audio File. Court Date & Time [2/4/2026 8:30:42 AM]. File Size [14581 KB]. Run Time [00:30:23]. (admin). (Entered: 02/04/2026)
02/04/2026	1249 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Norman Fishbein, Signed on 2/4/2026 (Related document(s):1222 Stipulation) (gc4) (Entered: 02/04/2026)
02/04/2026		Hearing Set by Request (Related document(s):1133 Generic Motion) Parties contacted the Case Manager. **Status conference to be held on 2/9/2026 at 08:30 AM at Houston, Courtroom 400 (ARP).** (tjl4) (Entered: 02/04/2026)
02/04/2026	1250 (31 pgs; 3 docs)	Application for Administrative Expenses *HEXAWARE TECHNOLOGIES LIMITEDS REQUEST FOR ALLOWANCE AND PAYMENT OF AN ADMINISTRATIVE CLAIM*. Objections/Request for Hearing Due in 21 days. Filed by Creditor Hexaware Technologies Limited (Attachments: #

		1 Proposed Order Ex. A (Proposed Order) # 2 Exhibit Ex. B (Invoices)) (Billingsley, James) (Entered: 02/04/2026)
02/04/2026	1251 (12 pgs)	Certificate *of Service re: 1) Reorganized Debtors Reply in Support of Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts; and 2) Declaration of Kenneth Shepard in Support of Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1213 Response, 1214 Declaration) (Gershbein, Evan) (Entered: 02/04/2026)
02/04/2026	1252 (15 pgs)	Certificate *of Service re: Notice Regarding the Status of Various Cure Objections* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1206 Notice) (Gershbein, Evan) (Entered: 02/04/2026)
02/04/2026	1253 (12 pgs)	BNC Certificate of Mailing. (Related document(s):1218 Generic Order) No. of Notices: 106. Notice Date 02/04/2026. (Admin.) (Entered: 02/04/2026)
02/04/2026	1254 (12 pgs)	BNC Certificate of Mailing. (Related document(s):1219 Generic Order) No. of Notices: 106. Notice Date 02/04/2026. (Admin.) (Entered: 02/04/2026)
02/05/2026	1255 (17 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Edwin Barroso-Perez; and 2) Stipulation and Agreed Order Granting Relief from Stay to Connie Smith* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1218 Generic Order, 1219 Generic Order) (Gershbein, Evan) (Entered: 02/05/2026)
02/06/2026	1256 (31 pgs; 5 docs)	Objection to Claim Number by Claimant Alea Kennedy. Alea Kennedy. / *Reorganized Debtors' Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy)* (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order) (Davidson, Timothy) (Entered: 02/06/2026)
02/06/2026	1257 (19 pgs; 3 docs)	Objection to Claim Number by Claimant / *Reorganized Debtors' Second Omnibus Objection to Certain Claims* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 02/06/2026)
02/06/2026	1258 (5 pgs)	Stipulation By ModivCare Inc. and Heather Swick. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/06/2026)
02/06/2026	1259 (1 pg)	MOTION to Appear Pro Hac Vice for Ruben Reyna (Fee Paid: $100, receipt number A26900921) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 02/06/2026)
02/06/2026	1260 (13 pgs; 2 docs)	Adversary case 26-03035. Nature of Suit: (91 (Declaratory judgment)), (72 (Injunctive relief - other)) Complaint by HealthSpring, Inc. against ModivCare Solutions, LLC. Fee Amount $350 (Attachments: # 1 Adversary Proceeding Cover Sheet) (Jones, Erin) (Entered: 02/06/2026)
02/06/2026	1261 (2 pgs)	Request for Issuance of Summons on ModivCare Solutions LLC. (Jones, Erin) (Entered: 02/06/2026)

02/07/2026	1262 (78 pgs; 9 docs)	Emergency Motion / *Reorganized Debtors' Emergency Motion for Protective Order or, in the Alternative, to Bifurcate Hearing in Connection with Motion to Reject* Filed by Debtor ModivCare Inc. Hearing scheduled for 2/9/2026 *at 08:30 AM at Houston, Courtroom 400 (ARP). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Proposed Order) (Davidson, Timothy)Modified on 2/9/2026 (tjl4). (Entered: 02/07/2026)*
02/08/2026	1263 (6 pgs)	Objection *of HealthSpring, Inc. to Reorganized Debtor's Emergency Motion for Protective Order or, in the alternative, to Bifurcate Hearing in Connection with Motion to Reject* (related document(s):1262 Emergency Motion (with hearing date)). Filed by HealthSpring, Inc. (Jones, Erin) (Entered: 02/08/2026)
02/09/2026	1264	Summons Not Issued as to ModivCare Solutions, LLC due to these deficiencies: Summons provided is for an adversary proceeding. Attorney or Plaintiff notified of deficiencies by NEF. (amp4) (Entered: 02/09/2026)
02/09/2026	1265 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Heather Swick, Signed on 2/9/2026 (Related document(s):1258 Stipulation) (gc4) (Entered: 02/09/2026)
02/09/2026	1266 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:39 AM. Appearances: See attached. ERO: Yes. Counsel updated the Court on 1133 which is to be heard on 2/13/2026 at 1:00 PM. (Related document(s):1133 Generic Motion, 1262 Emergency Motion (with hearing date)) (gc4) (Entered: 02/09/2026)
02/09/2026	1267 (1 pg)	PDF with attached Audio File. Court Date & Time [02/09/2026 08:30:34 AM]. File Size [3931 KB]. Run Time [00:08:15]. (admin). (Entered: 02/09/2026)
02/09/2026	1268 (734 pgs; 2 docs)	Final Application for Compensation / *First and Final Application of Latham & Watkins LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Co-Counsel to the Debtors for the Period of August 20, 2025 Through December 29, 2025* for Latham & Watkins LLP, Debtor's Attorney, Period: 8/20/2025 to 12/29/2025, Fee: $22673312.75, Expenses: $460717.30. Objections/Request for Hearing Due in 21 days. Filed by Attorney Latham & Watkins LLP (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1269 (185 pgs; 2 docs)	Final Application for Compensation / *First and Final Application of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of August 20, 2025 Through December 29, 2025* for Hunton Andrews Kurth LLP, Debtor's Attorney, Period: 8/20/2025 to 12/29/2025, Fee: $1401454.50, Expenses: $109498.32. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1270 (469 pgs; 2 docs)	Final Application for Compensation / *FTI Consulting Inc.'s Application for Final Allowance and Payment of Fees and Expenses as Financial Advisor, Chief Transformation Officer, and Additional Personnel for the Debtors for the Period from August 20, 2025 Through December 29, 2025* for FTI Consulting, Inc., Financial Advisor, Period: 8/20/2025 to

		12/29/2025, Fee: $9252783.25, Expenses: $64070.21. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1271 (139 pgs; 2 docs)	Final Application for Compensation / *Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025 through December 29, 2025* for Ernst & Young LLP, Other Professional, Period: 8/20/2025 to 12/29/2025, Fee: $1707182.80, Expenses: $0. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1272 (15 pgs; 2 docs)	Final Application for Compensation / *First and Final Fee Application of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors, for the Period from August 20, 2025 through December 29, 2025* for Cresa, LLC, Other Professional, Period: 8/20/2025 to 12/29/2025, Fee: $1950000.00, Expenses: $0.00. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1273 (109 pgs; 2 docs)	Final Application for Compensation for Quinn Emanuel Urquhart & Sullivan, LLP, Special Counsel, Period: 9/1/2025 to 12/29/2025, Fee: $2,056,575.25, Expenses: $17,184.47. Objections/Request for Hearing Due in 21 days. Filed by Spec. Counsel Quinn Emanuel Urquhart & Sullivan, LLP (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 02/09/2026)
02/09/2026	1274 (5 pgs)	Stipulation By ModivCare Inc. and Santa Guerrero. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/09/2026)
02/09/2026	1275 (18 pgs)	Certificate *of Service re: Documents Served on February 4, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1223 Debtor-in-Possession Monthly Operating Report, 1224 Debtor-in-Possession Monthly Operating Report, 1225 Debtor-in-Possession Monthly Operating Report, 1226 Debtor-in-Possession Monthly Operating Report, 1227 Debtor-in-Possession Monthly Operating Report, 1228 Debtor-in-Possession Monthly Operating Report, 1229 Debtor-in-Possession Monthly Operating Report, 1230 Debtor-in-Possession Monthly Operating Report, 1231 Debtor-in-Possession Monthly Operating Report, 1232 Debtor-in-Possession Monthly Operating Report, 1233 Debtor-in-Possession Monthly Operating Report, 1234 Debtor-in-Possession Monthly Operating Report, 1235 Debtor-in-Possession Monthly Operating Report, 1236 Debtor-in-Possession Monthly Operating Report, 1237 Debtor-in-Possession Monthly Operating Report, 1238 Debtor-in-Possession Monthly Operating Report, 1239 Debtor-in-Possession Monthly Operating Report, 1240 Debtor-in-Possession Monthly Operating Report, 1241 Debtor-in-Possession Monthly Operating Report, 1242 Debtor-in-Possession Monthly Operating Report, 1243 Debtor-in-Possession Monthly Operating Report, 1244 Debtor-in-Possession Monthly Operating Report, 1245 Debtor-in-Possession Monthly Operating Report, 1246 Debtor-in-Possession Monthly Operating Report, 1249 Generic Order) (Gershbein, Evan) (Entered: 02/09/2026)

02/09/2026	1276 (43 pgs; 2 docs)	Final Application for Compensation / *Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025* for Moelis & Company LLC, Other Professional, Period: 8/20/2025 to 12/29/2025, Fee: $11400000.00, Expenses: $51544.17. Objections/Request for Hearing Due in 21 days. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/09/2026)
02/10/2026	1277 (2 pgs)	Withdrawal of Claim: 10 (dah4) (Entered: 02/10/2026)
02/10/2026	1278 (11 pgs; 2 docs)	*Withdrawn* Application for Administrative Expenses . Objections/Request for Hearing Due in 21 days. Filed by Creditor Salesforce, Inc. (Attachments: # 1 Proposed Order) (Chou, Emily)Modified on 4/10/2026 (gc4). (Entered: 02/10/2026)
02/10/2026	1279 (7 pgs)	Declaration re: *Declaration in Support of the Application for Allowance and Payment of Administrative Expense Claim of Salesforce, Inc* (Filed By Salesforce, Inc.).(Related document(s):1278 Application for Administrative Expenses) (Chou, Emily) (Entered: 02/10/2026)
02/10/2026	1280 (1 pg)	Order Granting Motion for Ruben Reyna To Appear pro hac vice (Related Doc # 1259) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 2/10/2026. (gc4) (Entered: 02/10/2026)
02/10/2026	1281 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Santra Guerrero, Signed on 2/10/2026 (Related document(s):1274 Stipulation) (abh4) (Entered: 02/11/2026)
02/11/2026	1282 (62 pgs; 8 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7) (Davidson, Timothy) (Entered: 02/11/2026)
02/11/2026	1283	Sealed Document *Witness and Exhibit List* (Filed By HealthSpring, Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18 # 19 Exhibit 19 # 20 Exhibit 20 # 21 Exhibit 21 # 22 Exhibit 22 # 23 Exhibit 23 # 24 Exhibit 24 # 25 Exhibit 25 # 26 Exhibit 26 # 27 Exhibit 27 # 28 Exhibit 28 # 29 Exhibit 29 # 30 Exhibit 30 # 31 Exhibit 31 # 32 Exhibit 32 # 33 Exhibit 33 # 34 Exhibit 34 # 35 Exhibit 35 # 36 Exhibit 36 # 37 Exhibit 37 # 38 Exhibit 38 # 39 Exhibit 39 # 40 Exhibit 40 # 41 Exhibit 41 # 42 Exhibit 42 # 43 Exhibit 43 # 44 Exhibit 44 # 45 Exhibit 45 # 46 Exhibit 46 # 47 Exhibit 47 # 48 Exhibit 48 # 49 Exhibit 49 # 50 Exhibit 50 # 51 Exhibit 51 # 52 Exhibit 52 # 53 Exhibit 53 # 54 Exhibit 54 # 55 Exhibit 55 # 56 Exhibit 56 # 57 Exhibit 57 # 58 Exhibit 58 # 59 Exhibit 59 # 60 Exhibit 60 # 61 Exhibit 61 # 62 Exhibit 62 # 63 Exhibit 63 # 64 Exhibit 64 # 65 Exhibit 65) (Jones, Erin) (Entered: 02/11/2026)
02/11/2026	1284 (5 pgs; 2 docs)	Motion to Seal *HealthSpring, Inc.'s Witness/Exhibit List and Exhibits Filed at Dkt. No. 1283* Filed by Interested Party HealthSpring, Inc. (Attachments: # 1 Proposed Order) (Jones, Erin) (Entered: 02/11/2026)

02/11/2026	1285 (20 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; 3) Modified Official Form 410 Proof of Claim; and 4) Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/11/2026)
02/11/2026	1286 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 02/11/2026)
02/11/2026	1287 (7 pgs)	Certificate *of Service (Supplemental) re: 1) Notice of Chapter 11 Bankruptcy Case; 2) Notice of Deadlines for the Filing of Proofs of Claim, Including Requests for Payment Pursuant to Section 503(b)(9) of the Bankruptcy Code; 3) Modified Official Form 410 Proof of Claim; and 4) Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/11/2026)
02/11/2026	1288 (322 pgs; 2 docs)	Final Application for Compensation */ Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through December 29, 2025* for AlixPartners, LLP, Financial Advisor, Period: 9/10/2025 to 12/29/2025, Fee: $4,980,847.00, Expenses: $41,910.29. Objections/Request for Hearing Due in 21 days. Filed by Financial Advisor AlixPartners, LLP (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 02/11/2026)
02/11/2026	1289 (17 pgs)	Certificate *of Service re: 1) Reorganized Debtors Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy); and 2) Reorganized Debtors Second Omnibus Objection to Certain Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1256 Objection to Claim, 1257 Objection to Claim) (Gershbein, Evan) (Entered: 02/11/2026)
02/12/2026	1290 (53 pgs; 2 docs)	Final Application for Compensation */ White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 through December 29, 2025* for White & Case LLP, Attorney, Period: 9/9/2025 to 12/29/2025, Fee: $13,893,521.0, Expenses: $300,469.13. Objections/Request for Hearing Due in 21 days. Filed by Attorney White & Case LLP

		(Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 02/12/2026)
02/12/2026	1291 (5 pgs)	Declaration re: */ Fourth Supplemental Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):593 Declaration, 616 Order on Application to Employ, 965 Declaration, 1079 Declaration) (Koster, Charles) (Entered: 02/12/2026)
02/12/2026	1292 (16 pgs; 2 docs)	Reply *Sur-Reply of HealthSpring, Inc. to Debtor's Reply to Objection to Motion for Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts* (related document(s):1133 Generic Motion). Filed by HealthSpring, Inc. (Attachments: # 1 Exhibit A) (Jones, Erin) (Entered: 02/12/2026)
02/12/2026	1293 (16 pgs; 2 docs)	Exhibit List (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1283 Sealed Document, 1292 Reply) (Attachments: # 1 Exhibibit 69) (Jones, Erin) (Entered: 02/12/2026)
02/12/2026	1294 (8 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Heather Swick* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1265 Generic Order) (Gershbein, Evan) (Entered: 02/12/2026)
02/12/2026	1295 (8 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Santa Guerrero; and 2) Reorganized Debtors Witness and Exhibit List* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1281 Generic Order, 1282 Witness List, Exhibit List) (Gershbein, Evan) (Entered: 02/12/2026)
02/12/2026	1296 (19 pgs; 2 docs)	Final Application for Compensation */ First and Final Application of Mills Halstead Zaloudek, LLC as Real Estate Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of October 24, 2025 Through December 29, 2025* for Mills Halstead Zaloudek, LLC, Attorney, Period: 10/24/2025 to 12/29/2025, Fee: $5084.50, Expenses: $0. Objections/Request for Hearing Due in 21 days. Filed by Attorney Mills Halstead Zaloudek, LLC (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/12/2026)
02/13/2026	1297 (1 pg)	Courtroom Minutes. Time Hearing Held: 1:00 pm to 3:01 pm; 3:11 pm to 4:54 pm. Appearances: see log. Additional appearances: Elizabeth Betsy Marks, George Klidonas, Jonathan Jon Weichselbaum, Meghana Koenitzer, Matt Carter, and Joe Simons. Sworn and testified witness: Ken Shepard and Kayla McKenzie. Admitted exhibits: 1282-1, 1282-2, and 1282-4 through 1282-6,1283-57, 1283-1, 1283-59, 1283-20, 1283-28, 1283-32, 1283-35, 1283-36, 1283-37, 1283-46, 1283-50, 1283-9, and 1283-56. Motion hearing held. Oral argument heard on the record. Motion 1133 is to taken under advisement. The Court will issue its ruling on 2/17/26 at 4:00 pm. Mr. Robbins may proffer the additional witness testimony before the court, or he may consider Ms. Marks proposition of admitting the declaration as stated on the record. ERO: yes. (Related document(s):1133 Generic Motion) **Hearing scheduled for 2/17/2026 at 04:00 PM at telephone and video conference.** (abh4) (Entered: 02/13/2026)

02/13/2026	1298 (9 pgs)	Certificate *of Service re: Documents Served on or Before February 10, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1268 Application for Compensation, 1269 Application for Compensation, 1270 Application for Compensation, 1271 Application for Compensation, 1272 Application for Compensation, 1276 Application for Compensation) (Gershbein, Evan) (Entered: 02/13/2026)
02/16/2026	1299 (1 pg)	MOTION to Appear Pro Hac Vice for Randall L. Hagen (Fee Paid: $100, receipt number A26923188) Filed by Interested Party HealthSpring, Inc. (Jones, Erin) (Entered: 02/16/2026)
02/16/2026	1300 (3 pgs)	Notice of Appearance and Request for Notice Filed by Paul M. Lopez Filed by on behalf of COLLIN COUNTY TAX ASSESSOR/COLLECTOR (Lopez, Paul) (Entered: 02/16/2026)
02/16/2026	1301 (2 pgs)	Order Granting HealthSpring, Inc.s Motion to Seal Objection of HealthSpring, Inc. to Debtors Motion for an Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts [Docket No. 1133] and Supporting Declarations and Exhibits (Related Doc # 1190), Signed on 2/16/2026. (abh4) (Entered: 02/16/2026)
02/17/2026	1302 (1 pg)	Order Granting Motion for Randall L. Hagen To Appear pro hac vice (Related Doc # 1299) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 2/17/2026. (abh4) (Entered: 02/17/2026)
02/17/2026	1303 (9 pgs)	Brief (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1292 Reply) (Jones, Erin) (Entered: 02/17/2026)
02/17/2026	1304 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Expedited (7 days)) by HealthSpring, Inc.. This is to order a transcript of Hearing on Debtors' Motion to Reject held on 02/13/2026 at 1:00 p.m. CST before Judge Alfredo R. Perez. Court Reporter/Transcriber: Veritext Legal Solutions (Filed By HealthSpring, Inc.). (Jones, Erin) Electronically forwarded to Veritext Legal Solutions on 2/17/2026. Estimated completion date: 2/24/2026. Modified on 2/17/2026 (smg4). (Entered: 02/17/2026)
02/17/2026	1305 (2 pgs)	Stipulation By HealthSpring, Inc. and ModivCare Inc.. Does this document include an agreed order or otherwise request that the judge sign a document? No. (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1292 Reply, 1297 Courtroom Minutes, 1303 Brief) (Jones, Erin) (Entered: 02/17/2026)
02/17/2026	1306 (6 pgs)	Stipulation By ModivCare Inc. and Maria Angulo. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/17/2026)
02/17/2026	1307 (2 pgs)	Notice -- *Genesys Cloud Services Inc.'s Notice Of Withdrawal Of Its Objection To Debtors' Notice Of Potential Assumption Of Certain Debtors' Executory Contracts And Unexpired Leases*. (Related document(s):743 Objection) Filed by Genesys Cloud Services Inc (Rieger, Shannon) (Entered: 02/17/2026)

02/17/2026	1308 (2 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 02/17/2026)
02/17/2026	1321	Courtroom Minutes. Time Hearing Held: 4:00 pm to 4:19 pm; 4:37 pm to 4:45 pm. Appearances: Elizabeth Betsy Marks, George Klidonas, Jonathan Jon Weichselbaum, Meghana Koenitzer, Joshua Robbins, Steven Hamiliton, Thomas Koegel, Ruben Reyna, and Erin Jones. Motion hearing held. Oral argument heard on the record. The debtor is permitted to reject the contract for reasons stated on the record. Debtor is to submit a proposed form of order. ERO: yes. (Related document(s):1133 Generic Motion) (abh4) (Entered: 02/23/2026)
02/18/2026	1309 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Maria Angulo, Signed on 2/18/2026 (Related document(s):1306 Stipulation) (abh4) (Entered: 02/18/2026)
02/18/2026	1310 (1 pg)	PDF with attached Audio File. Court Date & Time [02/17/2026 04:00:03 PM]. File Size [12592 KB]. Run Time [00:26:40]. (admin). (Entered: 02/18/2026)
02/18/2026	1311 (22 pgs; 2 docs)	Certificate of No Objection *Regarding Motion of Reorganized Debtors for Entry of an Order: (A) Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections; (B) the Form of Objection Notice; and (C) Granting Related Relief* (Filed By ModivCare Inc.).(Related document(s):1201 Generic Motion) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 02/18/2026)
02/18/2026	1312 (4 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/18/2026)
02/18/2026	1314 (20 pgs)	Reply *of Claimant to Debtor's Objection to Claim Nos. 1678 and 1679*. Filed by Alea Rachel Kennedy (dmm4) (Entered: 02/19/2026)
02/19/2026	1313 (19 pgs)	Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief, Signed on 2/19/2026 (Related document(s):1201 Generic Motion, 1311 Certificate of No Objection) (abh4) (Entered: 02/19/2026)
02/19/2026	1315 (5 pgs)	Certificate *of Service re: First and Final Application of Mills Halstead Zaloudek, LLC as Real Estate Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of October 24, 2025 Through December 29, 2025* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1296 Application for Compensation) (Gershbein, Evan) (Entered: 02/19/2026)
02/19/2026	1316 (15 pgs)	BNC Certificate of Mailing. (Related document(s):1301 Order on Motion to Seal) No. of Notices: 71. Notice Date 02/19/2026. (Admin.) (Entered: 02/19/2026)

02/20/2026	1317 (14 pgs; 3 docs)	Notice *of Filing of Revised Proposed Order Authorizing the Reorganized Debtors to Reject Certain Executory Contracts*. (Related document(s):1133 Generic Motion) Filed by ModivCare Inc. (Attachments: # 1 Proposed Order # 2 Exhibit A) (Davidson, Timothy) (Entered: 02/20/2026)
02/20/2026	1318 (1 pg)	PDF with attached Audio File. Court Date & Time [02/13/2026 01:00:20 PM]. File Size [57069 KB]. Run Time [02:01:35]. (admin). (Entered: 02/20/2026)
02/20/2026	1319 (26 pgs; 3 docs)	Response (Filed By HealthSpring, Inc.).(Related document(s):1133 Generic Motion, 1188 Objection, 1189 Sealed Document, 1213 Response, 1292 Reply, 1310 MP3, 1317 Notice) (Attachments: # 1 Exhibit A - Email Correspondence # 2 Exhibit B - Proposed Order on Motion to Reject) (Jones, Erin) (Entered: 02/20/2026)
02/20/2026	1320 (6 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before February 18, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 02/20/2026)
02/23/2026	1322 (1 pg)	Order Setting Hearing, Signed on 2/23/2026 (Related document(s):1209 Motion to Compel) **Hearing scheduled for 3/30/2026 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 02/23/2026)
02/23/2026	1323 (9 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Maria Angulo* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1309 Generic Order) (Gershbein, Evan) (Entered: 02/23/2026)
02/24/2026	1324 (1 pg)	Transcript RE: hearing motion held on 2/13/26 before Judge ALFREDO R. PEREZ. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 05/26/2026. (VeritextLegalSolutions) (Entered: 02/24/2026)
02/24/2026	1325 (4 pgs)	Order Authorizing the Reorganized Debtors to Reject Certain Executory Contracts (Related Doc # 1133), Signed on 2/24/2026. (abh4) (Entered: 02/24/2026)
02/24/2026	1326 (5 pgs)	Certificate *of Service re: Order Approving Procedures for Reorganized Debtors Filing of Omnibus Claims Objections and Granting Related Relief* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1313 Generic Order) (Gershbein, Evan) (Entered: 02/24/2026)
02/26/2026	1327 (6 pgs)	Stipulation By ModivCare Inc. and Sonia Burgos. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/26/2026)

02/27/2026	1328 (7 pgs)	Second Notice *Regarding the Status of Various Cure Objections*. (Related document(s):1206 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 02/27/2026)
02/27/2026	1329 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Sonia Burgos, Signed on 2/27/2026 (Related document(s):1327 Stipulation) (gc4) (Entered: 02/27/2026)
02/27/2026	1330 (7 pgs)	Stipulation By ModivCare Inc. and Cindy Bosley. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 02/27/2026)
02/27/2026	1331 (7 pgs)	Certificate *of Service re: Order Authorizing the Reorganized Debtors to Reject Certain Executory Contracts* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1325 Generic Order) (Gershbein, Evan) (Entered: 02/27/2026)
02/27/2026	1332 (18 pgs)	BNC Certificate of Mailing. (Related document(s):1324 Transcript) No. of Notices: 106. Notice Date 02/27/2026. (Admin.) (Entered: 02/27/2026)
03/01/2026	1333 (13 pgs)	BNC Certificate of Mailing. (Related document(s):1329 Generic Order) No. of Notices: 106. Notice Date 03/01/2026. (Admin.) (Entered: 03/01/2026)
03/01/2026	1334 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Cindy Bosley, Signed on 3/1/2026 (Related document(s):1330 Stipulation) (gc4) (Entered: 03/02/2026)
03/03/2026	1335 (3 pgs; 2 docs)	Certificate of No Objection (Filed By Quinn Emanuel Urquhart & Sullivan, LLP).(Related document(s):1273 Application for Compensation) (Attachments: # 1 Proposed Order) (Tomasco, Patricia) (Entered: 03/03/2026)
03/03/2026	1336 (4 pgs; 2 docs)	Certificate of No Objection *Regarding First and Final Application of Latham & Watkins LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Co-Counsel to the Debtors for the Period of August 20, 2025 Through December 29, 2025* (Filed By Latham & Watkins LLP).(Related document(s):1268 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1337 (4 pgs; 2 docs)	Certificate of No Objection *Regarding First and Final Application of Hunton Andrews Kurth LLP as Bankruptcy Co-Counsel for the Debtors for Allowance and Payment of Fees and Expenses Incurred for the Period of August 20, 2025 Through December 29, 2025* (Filed By ModivCare Inc.).(Related document(s):1269 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1338 (5 pgs; 2 docs)	Certificate of No Objection *Regarding FTI Consulting Inc.'s Application for Final Allowance and Payment of Fees and Expenses as Financial Advisor, Chief Transformation Officer, and Additional Personnel for the Debtors for the Period from August 20, 2025 Through December 29, 2025* (Filed By FTI Consulting, Inc.).(Related document(s):1270

		Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1339 (7 pgs; 3 docs)	Certificate of No Objection *Regarding Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025 through December 29, 2025* (Filed By Ernst & Young LLP).(Related document(s):1271 Application for Compensation) (Attachments: # 1 Revised Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1340 (4 pgs; 2 docs)	Certificate of No Objection *Regarding First and Final Fee Application of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors, for the Period from August 20, 2025 through December 29, 2025* (Filed By Cresa, LLC).(Related document(s):1272 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1341 (5 pgs; 2 docs)	Certificate of No Objection *Regarding Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025* (Filed By Moelis & Company LLC).(Related document(s):1276 Application for Compensation) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/03/2026)
03/03/2026	1342 (6 pgs)	Stipulation By ModivCare Inc. and Moira Sandrock. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/03/2026)
03/04/2026	1343 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Moira Sandrock, Signed on 3/4/2026 (Related document(s):1342 Stipulation) (gc4) (Entered: 03/04/2026)
03/04/2026	1344 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses (Related Doc # 1268) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1345 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses for Hunton Andrews Kurth LLP as Debtor's Bankruptcy Co-Counsel (Related Doc # 1269) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1346 (2 pgs)	Order Allowing Compensation and Reimbursement of Expenses for FTI Consulting, Inc. as Financial Advisor, Chief Transformation Officer, and Additional Personnel to the Debtors for the Period from August 20, 2025 Through December 29, 2025 (Related Doc # 1270) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1347 (2 pgs)	Order Granting First and Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025 through December 29, 2025 (Related Doc # 1271) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)

03/04/2026	1348 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses of Cresa, LLC, Real Estate Consultant and Advisor to the Debtors (Related Doc # 1272) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1349 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses (Related Doc # 1273) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1350 (2 pgs)	Order Granting Final Fee Application of Moelis & Company LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Investment Banker to the Debtors for the Period from August 20, 2025 through December 29, 2025 (Related Doc # 1276) Signed on 3/4/2026. (gc4) (Entered: 03/04/2026)
03/04/2026	1351 (25 pgs; 2 docs)	Objection *To Final Request For Fees and Expenses by AlixPartners* (related document(s):1288 Application for Compensation). Filed by ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 03/04/2026)
03/05/2026	1352 (11 pgs)	Certificate *of Service re: 1) Second Notice Regarding the Status of Various Cure Objections; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Sonia Burgos* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1328 Notice, 1329 Generic Order) (Gershbein, Evan) (Entered: 03/05/2026)
03/05/2026	1353 (5 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Cindy Bosley* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1334 Generic Order) (Gershbein, Evan) (Entered: 03/05/2026)
03/05/2026	1354 (32 pgs)	Objection (related document(s):1290 Application for Compensation). Filed by ModivCare Topco, LLC (Goott, Miriam) (Entered: 03/05/2026)
03/05/2026	1355 (1 pg)	Proposed Order RE: (Filed By ModivCare Topco, LLC).(Related document(s):1354 Objection) (Goott, Miriam) (Entered: 03/05/2026)
03/06/2026	1356 (6 pgs)	Stipulation By ModivCare Inc. and Hannah Book. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/06/2026)
03/06/2026	1357 (6 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before February 25, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 03/06/2026)
03/06/2026	1358 (6 pgs)	Certificate *of Service (Supplemental) re: Documents Served on or Before February 27, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):53 Order on Emergency Motion, 66 Order on Emergency Motion, 353 Certificate, 1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 03/06/2026)
03/07/2026	1359 (2 pgs)	Certificate *of Non-Opposition* (Filed By Debra Jones).(Related document(s):1257 Objection to Claim) (Norwood, Bach) (Entered: 03/07/2026)

03/07/2026	1360 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Hannah Book, Signed on 3/7/2026 (Related document(s):1356 Stipulation) (gc4) (Entered: 03/09/2026)
03/09/2026		Adversary Case 4:26-ap-3035 Closed. (abh4) (Entered: 03/09/2026)
03/09/2026	1361 (1 pg)	Order Granting HealthSpring, Inc.'s Motion to Seal (Related Doc # 1284) Signed on 3/9/2026. (gc4) (Entered: 03/09/2026)
03/09/2026	1362 (1 pg)	Final Order Allowing Compensation and Reimbursement of Expenses for Mills Halstead Zaloudek as Debtors' Real Estate Counsel (Related Doc # 1296) Signed on 3/9/2026. (gc4) (Entered: 03/09/2026)
03/09/2026	1363 (8 pgs; 2 docs)	Motion to Extend Time */ Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* Filed by Debtor ModivCare Inc. (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/09/2026)
03/09/2026	1364 (8 pgs)	Certificate *of Service re: Documents Served on March 4, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1343 Generic Order, 1344 Order on Application for Compensation, 1345 Order on Application for Compensation, 1346 Order on Application for Compensation, 1347 Order on Application for Compensation, 1348 Order on Application for Compensation, 1350 Order on Application for Compensation, 1351 Objection) (Gershbein, Evan) (Entered: 03/09/2026)
03/10/2026	1365 (6 pgs)	Stipulation By ModivCare Inc. and Jhovanna Parker. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/10/2026)
03/10/2026	1367 (27 pgs; 2 docs)	Response (related document(s):1257 Objection to Claim). (Attachments: # 1 Exhibit) (bnb6) (Entered: 03/11/2026)
03/11/2026	1366 (5 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Jhovanna Parker, Signed on 3/11/2026 (Related document(s):1365 Stipulation) (gc4) (Entered: 03/11/2026)
03/11/2026	1368 (9 pgs)	Certificate *of Service re: Objection to Final Fee Application Filed by White & Case, LLP* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1354 Objection) (Gershbein, Evan) (Entered: 03/11/2026)
03/12/2026	1369 (6 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Hannah Book; 2) Final Order Allowing Compensation and Reimbursement of Expenses for Mills Halstead Zaloudek as Debtors Real Estate Counsel; and 3) Reorganized Debtors Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1360 Generic Order, 1362 Order on Application for Compensation, 1363 Motion to Extend Time) (Gershbein, Evan) (Entered: 03/12/2026)
03/13/2026		Hearing Set On (Related document(s):1257 Objection to Claim) Movant to notice all interested parties and file a certificate of service with the

		court. **Hearing scheduled for 4/8/2026 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 03/13/2026)
03/13/2026	1370 (3 pgs)	Order Granting Reorganized Debtors' Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy), Signed on 3/13/2026 (Related document(s):1256 Objection to Claim) (gc4) (Entered: 03/13/2026)
03/16/2026	1371 (9 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Jhovanna Parker* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1366 Generic Order) (Gershbein, Evan) (Entered: 03/16/2026)
03/17/2026	1372 (2 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 03/17/2026)
03/17/2026	1373 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 03/17/2026)
03/17/2026	1374 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 03/17/2026)
03/18/2026	1375 (9 pgs)	Certificate *of Service re: Order Granting Reorganized Debtors Objection to Proofs of Claim Nos. 1678 and 1679 (Alea Kennedy)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1370 Generic Order) (Gershbein, Evan) (Entered: 03/18/2026)
03/19/2026	1376 (5 pgs)	Notice *Regarding Rejection of Executory Contracts with PRN Ambulance LLC and ProTransport-1 LLC*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan, 1206 Notice, 1328 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 03/19/2026)
03/20/2026	1377 (6 pgs)	Stipulation By ModivCare Inc. and Stacie Rogers. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/20/2026)
03/20/2026	1378 (6 pgs)	Stipulation By ModivCare Inc. and Shabana Hafiz. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/20/2026)
03/21/2026	1379 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Stacie Rogers, Signed on 3/21/2026 (Related document(s):1377 Stipulation) (gc4) (Entered: 03/23/2026)

03/21/2026	1380 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Shabana Hafiz, Signed on 3/21/2026 (Related document(s):1378 Stipulation) (gc4) (Entered: 03/23/2026)
03/24/2026	1381 (9 pgs)	Certificate *of Service re: Notice Regarding Rejection of Executory Contracts with PRN Ambulance LLC and ProTransport-1 LLC* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1376 Notice) (Gershbein, Evan) (Entered: 03/24/2026)
03/26/2026	1382 (6 pgs)	Stipulation By ModivCare Inc. and Joyce Carr. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1383 (28 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Third Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1384 (28 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Fourth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1385 (28 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Fifth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1386 (28 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Sixth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1387 (28 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Seventh Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1388 (19 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Eighth Omnibus Objection to Certain Claims (Late-Filed Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/26/2026)
03/26/2026	1389 (13 pgs)	Response *to Notice Re: Rejection of Executory Contracts with PRN Ambulance LLC and Protransport-1 LLC*. Filed by PRN Ambulance, LLC, Protransport-1, LLC (Torrell, Gary) (Entered: 03/26/2026)
03/26/2026	1390 (10 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Stacie Rogers; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Shabana Hafiz* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1379 Generic Order, 1380 Generic Order) (Gershbein, Evan) (Entered: 03/26/2026)

03/27/2026	1391 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Joyce Carr, Signed on 3/27/2026 (Related document(s):1382 Stipulation) (gc4) (Entered: 03/27/2026)
03/30/2026	1392 (1 pg)	Courtroom Minutes. Time Hearing Held: 8:59 AM to 9:01 AM. Appearances: See attached. ERO: Yes. Motion 1209 is terminated as moot for the reasons stated on the record. (Related document(s):1209 Motion to Compel) (gc4) (Entered: 03/30/2026)
03/30/2026	1393 (1 pg)	PDF with attached Audio File. Court Date & Time [03/30/2026 08:59:23 AM]. File Size [760 KB]. Run Time [00:01:31]. (admin). (Entered: 03/30/2026)
03/31/2026	1394 (4 pgs; 2 docs)	Certificate of No Objection *Regarding Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* (Filed By ModivCare Inc.).(Related document(s):1363 Motion to Extend Time) (Attachments: # 1 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1395 (29 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Ninth Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Harbour, Jason) (Entered: 03/31/2026)
03/31/2026	1396 (29 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Tenth Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1397 (29 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Eleventh Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1398 (27 pgs; 3 docs)	Objection to Claim Number by Claimant */ Reorganized Debtors' Twelfth Omnibus Objection to Certain Claims (Satisfied Claims)* (Attachments: # 1 Exhibit A # 2 Proposed Order) (Davidson, Timothy) (Entered: 03/31/2026)
03/31/2026	1399 (7 pgs)	Third Notice *Regarding the Status of Various Cure Objections*. (Related document(s):1206 Notice, 1328 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 03/31/2026)
04/01/2026	1400 (2 pgs)	Order Granting Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims (Related Doc # 1363) Signed on 4/1/2026. (gc4) (Entered: 04/01/2026)
04/02/2026		Hearing Set On (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection) Movant to notice all interested parties and file a certificate of service with the court. **Status conference to be held on 4/6/2026 at 09:00 AM at telephone and video conference.** (abh4) (Entered: 04/02/2026)
04/02/2026	1401 (6 pgs)	Stipulation By ModivCare Inc. and Jessica Buhler. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/02/2026)

04/02/2026	1402 (281 pgs)	Certificate *of Service re: Documents Served on or Before March 27, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1383 Objection to Claim, 1384 Objection to Claim, 1385 Objection to Claim, 1386 Objection to Claim, 1387 Objection to Claim, 1388 Objection to Claim) (Gershbein, Evan) (Entered: 04/02/2026)
04/02/2026	1403 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Joyce Carr* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1391 Generic Order) (Gershbein, Evan) (Entered: 04/02/2026)
04/02/2026	1404 (4 pgs)	Notice *of Status Conference to be Held on April 6, 2026 at 9:00 a.m. (CT)*. (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection) Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 04/02/2026)
04/02/2026	1405 (1 pg)	Response *of ZBS Logistics, LLC to Omnibus Claim Objection*. Filed by ZBS Logistics, LLC (bnb6) (Entered: 04/02/2026)
04/02/2026	1406 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Confirmation Hearing on Joint Chapter 11 Plan and Related Matters, (II) Objection Deadline, and (III) Summary of the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):457 Order Setting Hearing, 801 Certificate) (Gershbein, Evan) (Entered: 04/02/2026)
04/02/2026	1408 (2 pgs)	Response (related document(s):1383 Objection to Claim). (bnb6) (Entered: 04/03/2026)
04/03/2026	1407 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Jessica Buhler, Signed on 4/3/2026 (Related document(s):1401 Stipulation) (gc4) (Entered: 04/03/2026)
04/03/2026	1409 (74 pgs; 4 docs)	Opposition Motion to Compel *White & Case, LLP to Respond to Discovery Requests* Filed by Interested Party ModivCare Topco, LLC (Attachments: # 1 Exhibit A - Requests for Production # 2 Exhibit B - Objections to Request for Production # 3 Proposed Order) (Goott, Miriam) (Entered: 04/03/2026)
04/03/2026	1410 (99 pgs; 5 docs)	Reply */ White & Case LLP's Reply in Support of its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* (related document(s):1290 Application for Compensation). Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D) (Koster, Charles) (Entered: 04/03/2026)
04/03/2026	1411 (49 pgs; 4 docs)	Reply *of AlixPartners, LLP to Objection to its Final Fee Application* (related document(s):1288 Application for Compensation). Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C) (Koster, Charles) (Entered: 04/03/2026)
04/03/2026	1412 (15 pgs; 2 docs)	Motion to Compel *MOTION OF CRESA, LLC TO ENFORCE THE FINAL FEE ORDER, COMPEL PAYMENT OF COURT-APPROVED FEES, AND*

		FOR RELATED RELIEF Filed by Other Prof. Cresa, LLC (Attachments: # 1 Proposed Order) (Rahn, Alexandria) (Entered: 04/03/2026)
04/06/2026	1413 (1 pg)	Courtroom Minutes. Time Hearing Held: 9:00 AM to 9:28 AM. Appearances: Appearances: See attached. Additional appearances: Johnie Patterson and Miriam Goott for the Reorganized Debtors. ERO: Yes. The Court discussed bifurcating the motion and continued the hearing to 4/30/2026 at 4:00 PM. (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection) **Status conference to be held on 4/30/2026 at 04:00 PM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 04/06/2026)
04/06/2026	1414 (1 pg)	PDF with attached Audio File. Court Date & Time [04/06/2026 09:00:09 AM]. File Size [12914 KB]. Run Time [00:27:22]. (admin). (Entered: 04/06/2026)
04/06/2026	1415 (24 pgs; 3 docs)	Witness List, Exhibit List (Filed By ModivCare Inc.). (Attachments: # 1 Exhibit 1 # 2 Exhibit 2) (Davidson, Timothy) (Entered: 04/06/2026)
04/06/2026	1416 (3 pgs)	Notice *of Virtual Hearing to Be Held on April 8, 2026, at 9:00 a.m. (Prevailing Central Time)*. (Related document(s):1257 Objection to Claim, 1367 Response) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 04/06/2026)
04/06/2026	1417 (195 pgs)	Certificate *of Service re Documents Served on March 31, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1395 Objection to Claim, 1396 Objection to Claim, 1397 Objection to Claim, 1398 Objection to Claim) (Gershbein, Evan) (Entered: 04/06/2026)
04/06/2026	1418 (12 pgs)	Certificate *of Service re 1) Third Notice Regarding the Status of Various Cure Objections and 2) Order Granting Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1399 Notice, 1400 Order on Motion to Extend Time) (Gershbein, Evan) (Entered: 04/06/2026)
04/06/2026	1419 (8 pgs)	Certificate *of Service re 1) Stipulation and Agreed Order Granting Relief from Plan Injunction to Jessica Buhler; and 2) ModivCare Topco, LLC's Motion to Compel White & Case, LLP to Respond to Discovery Requests* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Related document(s):1407 Generic Order, 1409 Motion to Compel) (Gershbein, Evan) (Entered: 04/06/2026)
04/06/2026	1420 (9 pgs)	Certificate *of Service re 1) Reorganized Debtors' Witness and Exhibit List; and 2) Notice of Virtual Hearing to be Held on April 8, 2026, at 9:00 a.m. (Prevailing Central Time)* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1415 Witness List, Exhibit List, 1416 Notice) (Gershbein, Evan) (Entered: 04/06/2026)
04/07/2026	1421 (17 pgs; 3 docs)	Agreed Order and Certificate of Counsel (Filed By ModivCare Inc.). (Related document(s):1257 Objection to Claim, 1367 Response) (Attachments: # 1 Proposed Order # 2 Redline) (Davidson, Timothy) (Entered: 04/07/2026)

04/07/2026	1422 (2 pgs)	Notice *of Cancellation of Virtual Hearing to Be Held on April 8, 2026, at 9:00 a.m. (prevailing Central Time)*. (Related document(s):1257 Objection to Claim, 1367 Response, 1416 Notice, 1421 Agreed Order and Certificate of Counsel) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 04/07/2026)
04/07/2026	1423 (6 pgs)	Order Granting Reorganized Debtors' Second Omnibus Objection to Certain Proofs of Claim, Signed on 4/7/2026 (Related document(s):1257 Objection to Claim) (gc4) (Entered: 04/07/2026)
04/08/2026	1424 (2 pgs)	Withdraw Document (Filed By Salesforce, Inc.).(Related document(s):1278 Application for Administrative Expenses) (Chou, Emily) (Entered: 04/08/2026)
04/08/2026	1425 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (3-Day) by Charles R. Koster. This is to order a transcript of the April 6, 2026 Status Conference before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 04/10/2026. Estimated completion date: 04/13/2026. Modified on 4/10/2026 (amp4). (Entered: 04/08/2026)
04/08/2026	1426 (8 pgs)	Response to Ninth Omnibus Claim by Gurpreet Singh (dah4) (Entered: 04/08/2026)
04/09/2026	1427 (18 pgs; 2 docs)	Emergency Motion , Motion to Reconsider (related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1413 Courtroom Minutes). Filed by Interested Party ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 04/09/2026)
04/10/2026		Hearing Set On (Related document(s):1427 Emergency Motion, Motion to Reconsider) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 4/30/2026 at 04:00 PM at Houston, Courtroom 400 (ARP).** (abh4) (Entered: 04/10/2026)
04/10/2026	1428 (6 pgs)	Stipulation By ModivCare Inc. and Debra Jones. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/10/2026)
04/10/2026	1429 (7 pgs; 2 docs)	Proposed Order RE: */ Notice of Filing Proposed Scheduling and Bifurcation Order* (Filed By Official Committee Of Unsecured Creditors). (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1410 Reply, 1411 Reply, 1427 Emergency Motion, Motion to Reconsider) (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 04/10/2026)
04/10/2026	1430 (6 pgs; 2 docs)	Proposed Order RE: */ Notice of Filing Proposed Order Requiring the Reorganized Debtors to Deposit Funds in Escrow with the Court* (Filed By Official Committee Of Unsecured Creditors).(Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1410 Reply, 1411 Reply, 1427 Emergency Motion, Motion to Reconsider) (Attachments: # 1 Proposed Order) (Koster, Charles) (Entered: 04/10/2026)

04/12/2026	1431 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Debra Jones, Signed on 4/12/2026 (Related document(s):1428 Stipulation) (gc4) (Entered: 04/13/2026)
04/14/2026	1432 (8 pgs)	Certificate *of Service re: 1) Certificate of Counsel Regarding Reorganized Debtors Second Omnibus Objection to Certain Claims; 2) Notice of Cancellation of Virtual Hearing to be Held on April 8, 2026, at 9:00 a.m. (Prevailing Central Time); and 3) Order Granting Reorganized Debtors Second Omnibus Objection to Certain Proofs of Claim* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1421 Agreed Order and Certificate of Counsel, 1422 Notice, 1423 Generic Order) (Gershbein, Evan) (Entered: 04/14/2026)
04/14/2026	1433 (9 pgs)	Certificate *of Service re: ModivCare Topco, LLCs Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1427 Emergency Motion, Motion to Reconsider) (Gershbein, Evan) (Entered: 04/14/2026)
04/14/2026	1434 (2 pgs)	Debtors Master Service List (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global). (Gershbein, Evan) (Entered: 04/14/2026)
04/15/2026	1435 (19 pgs)	Response *to Omnibus Claim Objection*. Filed by Lee Paige (bnb6) (Entered: 04/16/2026)
04/16/2026	1436 (1 pg)	Motion *for Leave to File Electronically.* Filed by Interested Party Mark P. Donaldson (dmm4) (Entered: 04/16/2026)
04/16/2026	1437 (6 pgs)	Objection *to Omnibus Objection re: Proof of Claim*. Filed by Mark P. Donaldson (dmm4) (Entered: 04/16/2026)
04/16/2026	1438 (1 pg)	Transcript RE: Status Conference held on April 6, 2026 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 07/15/2026. (mhen) (Entered: 04/16/2026)
04/16/2026	1439 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order Granting Relief from Plan Injunction to Debra Jones* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1431 Generic Order) (Gershbein, Evan) (Entered: 04/16/2026)
04/17/2026	1440 (12 pgs)	Stipulation By ModivCare Inc. and the Chubb Companies. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/17/2026)
04/17/2026	1441 (7 pgs)	Stipulation By ModivCare Inc. and Daniel Benke, Surnoivea Bryant, Albert Dunn, Jr., Willa Richardson. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/17/2026)

04/17/2026	1442 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 04/17/2026)
04/18/2026	1443 (11 pgs)	Stipulation and Agreed Order Related to the Withdrawal of (I) the Proofs of Claim of the Chubb Companies and (II) the Claim Objection, Signed on 4/18/2026 (Related document(s):1440 Stipulation) (gc4) (Entered: 04/20/2026)
04/18/2026	1444 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Claimants in Certain Personal injury Matters Pending in the Court of Common Pleas of Orangenburg County, South Carolina, Signed on 4/18/2026 (Related document(s):1441 Stipulation) (gc4) (Entered: 04/20/2026)
04/21/2026	1445 (1 pg)	Withdrawal of Claim: 33 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1446 (1 pg)	Withdrawal of Claim: 34 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1447 (1 pg)	Withdrawal of Claim: 35 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1448 (1 pg)	Withdrawal of Claim: 36 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1449 (1 pg)	Withdrawal of Claim: 37 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1450 (1 pg)	Withdrawal of Claim: 38 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/21/2026	1451 (1 pg)	Withdrawal of Claim: 39 Filed by Louisiana Department of Revenue (Anderson, Mia) (Entered: 04/21/2026)
04/23/2026	1452 (1 pg)	MOTION to Appear Pro Hac Vice for Armen M. Tashjian (Fee Paid: $100, receipt number A27125314) Filed by Creditor Shooshanik Charkhchian (Wang, Ronghua) (Entered: 04/23/2026)
04/23/2026	1453 (15 pgs)	Response (related document(s):1383 Objection to Claim). (Wang, Ronghua) (Entered: 04/23/2026)
04/23/2026	1454 (43 pgs)	Declaration re: -- *Declaration of Armen M. Tashjian in Support of Response of Shooshanik Charkhchian to Reorganized Debtors' Third Omnibus Objection to Certain Claims (Late-Filed Claims) as to Claim No. 1914* (Filed By Shooshanik Charkhchian).(Related document(s):1453 Response) (Wang, Ronghua) (Entered: 04/23/2026)
04/23/2026	1455 (10 pgs)	Response (Filed By Administrative Services Cooperative, Inc.).(Related document(s):1383 Objection to Claim) (Conley, Phillip) (Entered:

		04/23/2026)
04/23/2026	1456 (8 pgs)	Certificate *of Service re: 1) Stipulation and Agreed Order Related to the Withdrawal of (I) the Proofs of Claim of the Chubb Companies and (II) the Claim Objection; and 2) Stipulation and Agreed Order Granting Relief from Plan Injunction to Claimants in Certain Personal Injury Matters Pending in the Court of Common Pleas of Orangeburg County, South Carolina* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1443 Generic Order, 1444 Generic Order) (Gershbein, Evan) (Entered: 04/23/2026)
04/24/2026	1457 (1 pg)	Order Granting Motion for Armen M. Tashjian To Appear pro hac vice (Related Doc # 1452) **Note: Instructions to request Texas Southern CM/ECF registration through PACER are found here** Signed on 4/24/2026. (gc4) (Entered: 04/24/2026)
04/24/2026	1458 (50 pgs; 3 docs)	Objection / *White & Case LLP's Objection to ModivCare TopCo, LLC's Motion to Compel* (related document(s):1409 Motion to Compel). Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Exhibit A # 2 Exhibit B) (Koster, Charles) (Entered: 04/24/2026)
04/24/2026	1459 (4 pgs)	Stipulation By ModivCare Topco, LLC and Cresa, LLC. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Topco, LLC).(Related document(s):1412 Motion to Compel) (Patterson, Johnie) (Entered: 04/24/2026)
04/24/2026	1460 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1438 Transcript) No. of Notices: 113. Notice Date 04/24/2026. (Admin.) (Entered: 04/24/2026)
04/24/2026	1462 (2 pgs)	Response *to Reorganized Debtor's Eleventh Omnibus Claim Objection*. Filed by Jackson Parish Ambulance Service District (dmm4) (Entered: 04/27/2026)
04/24/2026	1464 (3 pgs)	Response to Omnibus Objection to Claim (related document(s):1387 Objection to Claim). (abh4) (Entered: 04/28/2026)
04/27/2026	1461 (4 pgs)	Stipulation and Agreed Order, Signed on 4/27/2026 (Related document(s):1412 Motion to Compel, 1459 Stipulation) (gc4) (Entered: 04/27/2026)
04/27/2026	1463 (8 pgs)	Response . Filed by Maxine Randolph (Attachments: # 1 Exhibit) (dmm4) (Entered: 04/27/2026)
04/27/2026	1465 (4 pgs)	Objection to Claim Number by Claimant Waldron & Company. Waldron & Company. *Seventh Omnibus Claim Objection* (dah4) (Entered: 04/28/2026)
04/28/2026	1466 (8 pgs)	Objection / *White & Case LLP's Objection to ModivCare TopCo, LLC's Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* (related document(s):1427 Emergency Motion, Motion to Reconsider). Filed by Official Committee Of Unsecured Creditors (Koster, Charles) (Entered: 04/28/2026)

04/28/2026	1467 (2 pgs)	Proposed Order RE: *and Certificate of Service* (Filed By Maxine Randolph).(Related document(s):1463 Response) (var2) (Entered: 04/28/2026)
04/28/2026	1468 (5 pgs)	Response *to Reorganized Debtors Fourth Omnibus Claim Objection*. Filed by Eileen Garcia (dmm4) (Entered: 04/28/2026)
04/29/2026	1469 (6 pgs)	Stipulation By ModivCare Inc. and Tristen Brenner. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 04/29/2026)
04/29/2026	1470 (11 pgs; 2 docs)	Application for Administrative Expenses . Objections/Request for Hearing Due in 21 days. Filed by Creditors PRN Ambulance, LLC, Protransport-1, LLC (Attachments: # 1 Proposed Order) (Mayer, Simon) (Entered: 04/29/2026)
04/30/2026	1471 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By ModivCare Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1472 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Higi SH LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1473 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Valued Relationships, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1474 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By ModivCare Solutions, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1475 (14 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By All Metro Home Care Services of New York, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1476 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By All Metro Payroll Services Corporation). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1477 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By At-Home Quality Care, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1478 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By California MedTrans Network IPA LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1479 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By California MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1480 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By CareGivers America Registry, LLC). (Rankin, Catherine) (Entered: 04/30/2026)

04/30/2026	1481 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Florida MedTrans Network LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1482 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Florida MedTrans Network MSO LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1483 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Health Trans, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1484 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Healthcom Holdings LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1485 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Higi Care Holdings, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1486 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Higi SH Holdings Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1487 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Metropolitan Medical Transportation IPA, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1488 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By MLA Sales, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1489 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By National MedTrans, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1490 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By OEP AM, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1491 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Provado Technologies, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1492 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Red Top Transportation, Inc.). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1493 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By TriMed, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1494 (10 pgs)	Chapter 11 Post-Confirmation Report for Quarter Ended 3/31/2026 (Filed By Victory Health Holdings, LLC). (Rankin, Catherine) (Entered: 04/30/2026)
04/30/2026	1495 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Tristen Brenner, Signed on 4/30/2026 (Related document(s):1469 Stipulation) (gc4) (Entered: 04/30/2026)

04/30/2026	1496 (8 pgs)	Response (Relates to docket entry 1395) (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn)Modified on 5/1/2026 (abh4). (Entered: 04/30/2026)
04/30/2026	1497 (18 pgs)	Declaration re: *ISO of AlphaOne Response to Debtors' Ninth Omnibus Claim Objection* (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn) (Entered: 04/30/2026)
04/30/2026	1498 (2 pgs)	Proposed Order RE: *Overruling Reorganized Debtors' Ninth Omnibus Objection* (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn) (Entered: 04/30/2026)
04/30/2026	1499 (1 pg)	Certificate *of Service* (Filed By AlphaOne Ambulance Medical Services, Inc.). (Krogh, Shawn) (Entered: 04/30/2026)
04/30/2026	1500 (5 pgs)	Fourth Notice *Regarding the Status of Various Cure Objections*. (Related document(s):605 Notice, 1055 Order Confirming Chapter 11 Plan, 1206 Notice, 1328 Notice, 1399 Notice) Filed by ModivCare Inc. (Davidson, Timothy) (Entered: 04/30/2026)
04/30/2026	1501 (1 pg)	Courtroom Minutes. Time Hearing Held: 4:00 PM to 4:32 PM. Appearances: See attached. Additional appearances: Johnie Patterson and Miriam Goot for Topco. ERO: Yes. Hearing continued to 6/09/2026 at 10:00 AM. Any additional filings may be filed by 6/03/2026, with replies to be filed before 6/09/2026. (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1427 Emergency Motion, Motion to Reconsider) **Hearing scheduled for 6/9/2026 at 10:00 AM at Houston, Courtroom 400 (ARP).** (gc4) (Entered: 04/30/2026)
04/30/2026	1502 (2 pgs)	Order Requiring the Reorganized Debtors to Deposit Funds in Escrow with the Court, Signed on 4/30/2026 (Related document(s):1288 Application for Compensation, 1290 Application for Compensation) (gc4) (Entered: 04/30/2026)
04/30/2026	1503 (1 pg)	PDF with attached Audio File. Court Date & Time [04/30/2026 04:00:56 PM]. File Size [14634 KB]. Run Time [00:31:00]. (admin). (Entered: 04/30/2026)
04/30/2026	1504 (7 pgs)	Certificate *of Service re: Stipulation and Agreed Order* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1461 Generic Order) (Gershbein, Evan) (Entered: 04/30/2026)
04/30/2026	1505 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 04/30/2026)
05/01/2026	1506 (4 pgs; 2 docs)	Notice of Appeal filed. (related document(s):1502 Generic Order). Fee Amount $298. Appellant Designation due by 05/15/2026. (Attachments: # 1 Exhibit Order Appealed From) (Patterson, Johnie) (Entered: 05/01/2026)

05/01/2026		Receipt of Notice of Appeal(25-90309) [appeal,ntcapl] (298.00) Filing Fee. Receipt number A27151923. Fee amount $ 298.00. (U.S. Treasury) (Entered: 05/01/2026)
05/01/2026	1507	Election to Appeal to District Court . (Patterson, Johnie) (Entered: 05/01/2026)
05/01/2026	1509 (43 pgs)	Response (related document(s):1397 Objection to Claim). (var2) (Entered: 05/04/2026)
05/02/2026	1508 (20 pgs)	BNC Certificate of Mailing. (Related document(s):1502 Generic Order) No. of Notices: 116. Notice Date 05/02/2026. (Admin.) (Entered: 05/02/2026)
05/04/2026	1510 (1 pg)	AO 435 TRANSCRIPT ORDER FORM (Daily (24 hours)) by Charles R. Koster. This is to order a transcript of the April 30, 2026 Hearing before Judge Alfredo R. Perez. Court Reporter/Transcriber: Judicial Transcribers of Texas (Filed By Official Committee Of Unsecured Creditors). (Koster, Charles) Electronically forwarded to Judicial Transcribers of Texas on 5/4/26. Estimated completion date: 5/5/26. Modified on 5/4/2026 (anc4). (Entered: 05/04/2026)
05/05/2026	1511 (1 pg)	Transcript RE: Status Conference held on April 30, 2026 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 08/3/2026. (mhen) (Entered: 05/05/2026)
05/05/2026	1512 (13 pgs; 3 docs)	Notice *of Filing Proposed Scheduling and Bifurcating Order*. (Related document(s):1354 Objection, 1410 Reply, 1427 Emergency Motion, Motion to Reconsider, 1466 Objection) Filed by Official Committee Of Unsecured Creditors (Attachments: # 1 Proposed Order # 2 Exhibit A - Redline) (Koster, Charles) (Entered: 05/05/2026)
05/05/2026	1513 (15 pgs)	Certificate *of Service re: Documents Served on April 30, 2026* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1471 Chapter 11 Post-Confirmation Report, 1472 Chapter 11 Post-Confirmation Report, 1473 Chapter 11 Post-Confirmation Report, 1474 Chapter 11 Post-Confirmation Report, 1475 Chapter 11 Post-Confirmation Report, 1476 Chapter 11 Post-Confirmation Report, 1477 Chapter 11 Post-Confirmation Report, 1478 Chapter 11 Post-Confirmation Report, 1479 Chapter 11 Post-Confirmation Report, 1480 Chapter 11 Post-Confirmation Report, 1481 Chapter 11 Post-Confirmation Report, 1482 Chapter 11 Post-Confirmation Report, 1483 Chapter 11 Post-Confirmation Report, 1484 Chapter 11 Post-Confirmation Report, 1485 Chapter 11 Post-Confirmation Report, 1486 Chapter 11 Post-Confirmation Report, 1487 Chapter 11 Post-Confirmation Report, 1488 Chapter 11 Post-Confirmation Report, 1489 Chapter 11 Post-Confirmation Report, 1490 Chapter 11 Post-Confirmation Report, 1491 Chapter 11 Post-Confirmation Report, 1492 Chapter 11 Post-Confirmation Report, 1493 Chapter 11 Post-Confirmation Report, 1494 Chapter 11 Post-Confirmation Report, 1495 Generic Order, 1500 Notice) (Gershbein, Evan) (Entered: 05/05/2026)

05/05/2026	1514 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 05/05/2026)
05/06/2026	1515 (11 pgs)	Response to ModivCare Inc., et al., (Reorganized Debor) and ModivCare Solutions LLC Objection Filing. (dlr1)Modified on 5/6/2026 (dlr1). (Entered: 05/06/2026)
05/06/2026	1516 (1 pg)	Clerk's Notice of Filing of an Appeal. On May 1, 2026, ModivCare Topco, LLC filed a notice of appeal. The appeal has been assigned to U.S. District Judge Nicholas J. Ganjei, Civil Action 4:26-cv-03651. Parties notified (Related document(s):1506 Notice of Appeal) (sat4) (Entered: 05/06/2026)
05/07/2026	1517 (10 pgs)	Letter from Barbara Elaine Neiswender regarding Claim. (var2) (Entered: 05/07/2026)
05/07/2026	1518 (14 pgs; 2 docs)	Emergency Motion , Motion To Stay Pending Appeal (related document(s):1502 Generic Order, 1506 Notice of Appeal). Filed by Interested Party ModivCare Topco, LLC (Attachments: # 1 Proposed Order) (Patterson, Johnie) (Entered: 05/07/2026)
05/08/2026	1519 (19 pgs)	BNC Certificate of Mailing. (Related document(s):1511 Transcript) No. of Notices: 116. Notice Date 05/08/2026. (Admin.) (Entered: 05/08/2026)
05/09/2026	1520 (3 pgs)	Scheduling and Bifurcation Order, Signed on 5/9/2026 (Related document(s):1288 Application for Compensation, 1290 Application for Compensation, 1351 Objection, 1354 Objection, 1409 Motion to Compel, 1410 Reply, 1411 Reply, 1427 Emergency Motion, Motion to Reconsider, 1458 Objection, 1466 Objection) (gc4) (Entered: 05/11/2026)
05/11/2026		Hearing Set On (Related document(s):1518 Emergency Motion, Motion To Stay Pending Appeal) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 5/20/2026 at 08:30 AM at telephone and video conference.** (tjl4) (Entered: 05/11/2026)
05/11/2026	1521 (46 pgs; 5 docs)	Emergency Motion */ White & Case LLP's (I) Emergency Motion for Entry of an Order Finding ModivCare TopCo LLC in Civil Contempt, and (II) Objection to ModivCare TopCo, LLC's Emergency Motion for Stay Pending Appeal* Filed by Attorney White & Case LLP (Attachments: # 1 Proposed Order # 2 Exhibit 1 # 3 Exhibit 2 # 4 Exhibit 3) (Koster, Charles) (Entered: 05/11/2026)
05/12/2026		Hearing Set On (Related document(s):1521 Emergency Motion) Movant to notice all interested parties and file a certificate of service with the court. **Hearing scheduled for 5/20/2026 at 08:30 AM at telephone and video conference.** (tjl4) (Entered: 05/12/2026)
05/12/2026	1522 (3 pgs)	Notice *of Withdrawal of Appearance and Request to Cease Service of Notices, Orders, Pleadings, and Documents*. Filed by Cresa, LLC (Boydston, Elizabeth) (Entered: 05/12/2026)

05/12/2026	1523 (4 pgs)	Notice *of Hybrid Hearing to be Held on May 20, 2026 at 8:30 a.m. (Prevailing Central Time)*. (Related document(s):1521 Emergency Motion) Filed by White & Case LLP (Koster, Charles) (Entered: 05/12/2026)
05/12/2026	1524 (9 pgs)	Certificate *of Service re: ModivCare Topco, LLCs Emergency Motion for Stay Pending Appeal* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1518 Emergency Motion, Motion To Stay Pending Appeal) (Gershbein, Evan) (Entered: 05/12/2026)
05/13/2026	1525 (3 pgs)	Certificate *of Service (Supplemental) re: Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plans Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* (Filed By Kurtzman Carson Consultants, LLC d/b/a Verita Global).(Related document(s):1134 Notice, 1182 Certificate) (Gershbein, Evan) (Entered: 05/13/2026)
05/14/2026	1526 (6 pgs)	Stipulation By ModivCare Inc. and Howard Rogers. Does this document include an agreed order or otherwise request that the judge sign a document? Yes. (Filed By ModivCare Inc.). (Davidson, Timothy) (Entered: 05/14/2026)
05/14/2026	1527 (2 pgs)	Statement of Issues on Appeal (related document(s):1506 Notice of Appeal). (Patterson, Johnie) (Entered: 05/14/2026)
05/14/2026	1528 (3 pgs)	Appellant Designation of Contents For Inclusion in Record On Appeal (related document(s):1506 Notice of Appeal). (Patterson, Johnie) (Entered: 05/14/2026)
05/15/2026	1529 (6 pgs)	Stipulation and Agreed Order Granting Relief from Plan Injunction to Howard Rogers, Signed on 5/15/2026 (Related document(s):1526 Stipulation) (gc4) (Entered: 05/15/2026)

PACER Service Center

Transaction Receipt

05/18/2026 10:30:15

PACER Login:	johniepatterson	**Client Code:**	
Description:	Docket Report	**Search Criteria:**	25-90309 Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Format: html Page counts for documents: included
Billable Pages:	30	**Cost:**	3.00

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

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

COMPLEX CASE FEE APPLICATION COVER SHEET FOR WHITE & CASE LLP'S FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**White & Case LLP**	
Applicant's Role in Case:	Counsel to the Official Committee of Unsecured Creditors (the "Committee")	
Employment Order:	October 31, 2025 [Docket No. 616]	
Application: FINAL	**Beginning Date**	**End Date**
Time period covered by this Application for which interim compensation has not previously been awarded:	12/1/2025	12/29/2025
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case?		Yes
Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed?		Yes
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases?		Yes
Do expense reimbursements represent actual and necessary expenses incurred?		Yes

[1] A complete list of each of the Debtors in these 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 these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Compensation Breakdown for Final Period Covered by This Application	
Total professional fees requested in this Application:	$13,629,498.00[2]
Total professional hours covered by this Application:	9,298.0
Average hourly rate for attorneys:	$1,466
Total paraprofessional fees requested in this Application:	$264,023.00
Total actual paraprofessional hours covered by this Application:	527.9
Average hourly rate for paraprofessionals:	$500
Total fees requested in this Application:	$13,893,521.00
Total expense reimbursements requested in this Application:	$300,469.13
Total fees and expenses requested in this Application:	$14,193,990.13

Status of Plan: On December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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]. On December 29, 2025, the effective date under the Debtors' plan occurred.

Primary Benefits: White & Case LLP served as the Committee's general bankruptcy counsel in all aspects of the chapter 11 cases. Among other things, the firm advised the Committee with respect to:

a) Advising the Committee regarding the chapter 11 process, the rights of unsecured creditors, and their fiduciary duties;
b) Keeping the Committee apprised of developments in the chapter 11 cases;
c) Challenging the terms of the Debtors' debtor-in-possession financing, including discovery;
d) Objecting to the Debtors' disclosure statement;
e) Challenging the Debtors' settlement with UnitedHealthcare, including discovery;
f) Investigating the Debtors' prepetition uptier transaction and the validity of liens on the Debtors' assets, including discovery;
g) Litigating motions for derivative standing to prosecute claims arising from the Debtors' prepetition uptier transaction and challenging the validity of liens on the Debtors' assets;
h) Contesting confirmation of the chapter 11 plan, primarily but not exclusively, concerning the value of the Debtors' estates, including discovery with respect to the foregoing; and
i) Advising the Committee on settlement issues.

[2] Throughout the chapter 11 cases, in preparing the Prior Fee Statements and this Application, White & Case reviewed its fees worked and expenses incurred. Following that review, White & Case voluntarily elected to reduce its fees by 377.8 hours totaling $487,911.00, and its expenses by $7,432.84. White & Case will not seek payment for such amounts under this final fee application.

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

In re:	)	
	)	Chapter 11
MODIVCARE, INC, *et al*.[3]	)	
	)	Case No. 25-90309 (ARP)
Debtors.	)	(Jointly Administered)

WHITE & CASE LLP'S FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

TO UNITED STATES BANKRUPTCY JUDGE ALFREDO R. PEREZ:

White & Case LLP ("White & Case"), counsel for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned chapter 11 cases of the debtors and debtors in possession (the "Debtors"), states as follows in support of this final application (this "Application") requesting final allowance and payment of compensation for services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the period from September 9, 2025 through December 29, 2025 (the "Final Period"):

[3] A complete list of each of the Debtors in these 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 these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

JURISDICTION

1. The United States Bankruptcy Court for the Southern District of Texas (the "Court") has jurisdiction over this matter under to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper under to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and other bases for the relief requested is section 330 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules"), Paragraph 60 of the *Procedures for Complex Cases in the Southern District of Texas*, and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 500] (the "Compensation Procedures Order"), and the Confirmation Order and Plan (each as defined herein).

RELIEF REQUESTED

4. White & Case requests that the Court enter an order granting White & Case final allowance and directing the Debtors to remit payment to White & Case of compensation for services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the Final Period.

PROCEDURAL BACKGROUND

A. The Debtors' Chapter 11 Cases

5. Each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court on August 20, 2025 (the "Petition Date"). The Debtors continued to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner was appointed.

6. On September 5, 2025, the United States Trustee for Region 7 (the "U.S. Trustee") filed *The United States Trustee's Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 124], notifying parties in interest that the U.S. Trustee had appointed the Committee in these chapter 11 cases. For most of these chapter 11 cases, the Committee was comprised of the following members: (a) Wilmington Savings Fund Society, FSB; (b) Madison Avenue International LP; (c) Jupiter Asset Management; (d) Uber Health, LLC; (e) MedEx Medical Transport Service, Inc.; and (f) Marquis Hines.[4]

7. On October 12, 2025, the Court entered the Compensation Procedures Order. [Docket No. 500].

8. On December 15, 2025, (the "Confirmation Date"), the Court entered an order [Docket No. 1055] (the "Confirmation Order") confirming the Plan.

9. On December 29, 2025, the effective date (the "Effective Date") of the Plan occurred. The Plan requires all professionals, including White & Case, to file final applications for services rendered and reimbursement of expenses through the Effective Date no later than forty-five (45) days after the Effective Date. Professionals' fees and expenses of the Committee (and other parties) incurred after the Confirmation Date are subject to the reimbursement provisions of the Plan.

B. Retention of White & Case as Counsel to the Committee and Prior Fee Requests

10. On September 9, 2025, the Committee selected White & Case as its bankruptcy counsel.

11. On October 8, 2025, the Committee filed its *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White*

[4] Randstad North America resigned on October 22, 2025, at which time the Committee was reconstituted [Docket No. 568].

& Case LLP as Counsel Effective as of September 9, 2025 [Docket No. 472] (the "Retention Application").

12. On October 31, 2025, the Court entered an order [Docket No. 616] (the "Retention Order") approving the Retention Application and authorizing the retention of White & Case as bankruptcy counsel to the Committee effective as of September 9, 2025. The Retention Order authorizes White & Case to be compensated on an hourly basis and to be reimbursed for actual and necessary expenses.

13. On November 7, 2025, White & Case filed and served White & Case LLP's *First Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and including September 30, 2025* [Docket No. 684] (the "First Monthly Fee Statement"). In the First Monthly Fee Statement, White & Case sought payment of (i) $2,064,621.60 (80% of $2,580,777.00) as compensation for professional services rendered and (ii) $20,974.54 for reimbursement of expenses. There were no objections to the First Monthly Fee Statement. White & Case received payments of $2,085,596.14 after the objection deadline passed.

14. On December 2, 2025, White & Case filed and served *White & Case LLP's Second Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2025 to and Including October 31, 2025* [Docket No. 882] (the "Second Monthly Fee Statement"). In the Second Monthly Fee Statement, White & Case sought payment of (a) $2,875,109.60 (80% of $3,593,887.00) as compensation for professional services rendered and (b) $32,303.88 for reimbursement of expenses. There were no objections to the Second Monthly Fee Statement. White & Case received payments of $2,907,413.48 after the objection deadline passed.

15. On December 5, 2025, White & Case filed and served *White & Case LLP's Third Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2025 to and Including November 30, 2025* [Docket No. 957] (the "Third Monthly Fee Statement"). In the Third Monthly Fee Statement, White & Case sought payment of (a) $3,683,445.60 (80% of $4,604,307.00) as compensation for professional services rendered and (b) $93,701.82 for reimbursement of expenses. There were no objections to the Third Monthly Fee Statement. White & Case received payments of $3,777,147.42 after the objection deadline passed.

16. On December 9, 2025, White & Case filed and served *White & Case LLP's First Interim Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including November 30, 2025* [Docket No. 1000] (the "Interim Fee Application"). In the Interim Fee Application, White & Case sought (a) approval of $10,778,971.0 as compensation for professional services rendered and $146,980.24 for reimbursement of expenses, and (b) payment of the unpaid amounts of such approved amounts. There were no objections to the Interim Fee Application. The Court entered an order approving the Interim Fee Application and authorizing the Debtors to disburse any unpaid amounts allowed. [Docket No. 1151]. White & Case received payments of $2,155,794.20 thereafter.

17. On January 26, 2026, White & Case filed and served *White & Case LLP's Fourth Monthly Fee Statement for Allowance of Compensation and Reimbursement of Expenses for the Period from December 1, 2025 to and Including December 29, 2025* [Docket No. 1197] (the "Fourth Monthly Fee Statement" and, collectively with the First Monthly Fee Statement, Second Monthly Fee Statement, Third Monthly Fee Statement, the "Prior Fee Statements"). In the Fourth Monthly Fee Statement, White & Case sought payment of (a) $2,491,640.00 (80% of

$3,114,550.00) as compensation for professional services rendered, and (b) $147,671.31 for reimbursement of expenses. There were no objections to the Fourth Monthly Fee Statement. White & Case expects to receive payments of $2,639,311.31 before this Application is heard.

18. In support of this Application, White & Case submits its Prior Fee Statements and Interim Fee Application, previously filed and served in these chapter 11 cases, which are incorporated by reference.

CASE SUMMARY[5]

19. The Debtors' chapter 11 cases presented complex issues on a very short timeline requiring, among other things, a thorough investigation of a liability management exercise consummated only five months prior to the Petition Date and an assessment of the Debtors' untested plan valuation, which initially would have left unsecured creditors entirely out of the money.[6] The Committee's advisors determined that the Debtors' valuation was particularly "cuspy"—meaning that either a successful challenge to the secured creditors' claims or minor adjustments to the Debtors' valuation would put the unsecured creditors' class in the money.

20. At the outset of these chapter 11 cases, the Debtors (based on the milestones set by the Consenting Creditors[7] under a proposed plan that would not provide any recovery for unsecured creditors) sought to confirm a plan and exit chapter 11 within *ninety days* after the Petition Date and only *sixty-nine days* after White & Case's retention as Committee counsel. Once retained, White & Case immediately began working to: (i) evaluate the Debtors' first day motions,

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5 An extensive description of these Chapter 11 Cases is contained within the disclosure statement.

6 The Debtors' initial plan only provided the general unsecured creditor class with a pro rata share of the right (if qualified) to purchase up to $200 million of new common interests pursuant to an equity rights offering. *See Joint Chapter 11 Plan of Reorganization of ModivCare Inc. And Its Debtor Affiliates* [Docket No. 119] (as later amended, the "Plan").

7 "Consenting Creditors" refers to the Debtors' prepetition secured creditors represented by Paul Hastings LLP set forth on Exhibit A to the *Verified Statement Pursuant to Bankruptcy Rule 2019* [Docket No. 791]

including the proposed DIP Facility (as defined below), the Plan, and the Disclosure Statement;[8] (ii) assess the Debtors' proposed valuation, which was not market tested or then-supported by expert work product and was much lower than the valuation for their liability management transaction consummated just six months prior to the Petition Date; and (iii) investigate the prepetition secured creditors' lien package and prepetition transactions, including the recently consummated uptier notes exchange, which came at the expense of the recoveries of a substantial portion of the unsecured creditors in these cases.

21. This was not a small task. For instance, the DIP Facility included a significant backstop fee in the form of twenty percent (20%) of the post-reorganization equity that had already been approved by the Bankruptcy Court at the first day hearing, and the value of which had not yet been determined. The Committee's position was that this provision (along with several other provisions discussed below) created a further risk of depleting value that would otherwise be available to unsecured creditors. In addition, assessing the Debtors' proposed Plan valuation—which was not yet in process as of the Petition Date—required the application of two distinct types of expertise: (i) an evaluation of the Debtors' business plan on a granular, segment-by-segment basis; and (ii) a determination and application of the appropriate valuation methodology.

22. White & Case also conducted a thorough assessment of the Debtors' potential settlement with UnitedHealthcare Insurance Company ("UHC"). The Committee determined it was prudent to evaluate the terms of the UHC Settlement (as defined below) because, among other things, the termination of the UHC relationship would have a direct impact on stakeholder recoveries. The Committee conducted required diligence in keeping with its statutory duties. As further discussed below, the Debtors' relationship with UHC was also a key workstream leading

[8] "Disclosure Statement" refers to the *Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 550].

up to the confirmation hearing, in part because the Debtors did not disclose whether UHC had found replacement parties for their key contracts until after the confirmation hearing had begun.[9]

23. White & Case also investigated potential claims and causes of action related to the Debtor's prepetition transactions. Investigating the prepetition liability management transaction required extensive review of the Debtors' financial condition at various points in time, scrutiny of applicable market factors and the participants' incentives, a valuation of consideration exchanged, and analysis of the legal principles applicable to certain potential claims arising from the transaction. The Committee served targeted discovery relating to these issues. The Debtors' independent director (the "Independent Director") and his counsel, Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn"), tasked with a similar investigation mandate (but on behalf of a different constituency), also served document requests, conducted numerous interviews, reviewed all of the documents produced in responsive to the Committee's requests, and attended the depositions noticed by the Committee regarding the transactions and conduct at issue.

24. White & Case did not represent the members of the Committee in their individual capacity. But the firm was nevertheless forced to address the repercussions for the Committee of unreasonable discovery served on two Committee members by the Debtors and the Consenting Creditors.

25. In just over three months, White & Case reviewed more than 30,000 documents, conducted 14 depositions of representatives for the Debtors (including certain current and former directors and officers) and Consenting Creditors, and held three interviews with the Debtors' management team. White & Case (and the other Committee professionals) worked around the clock to satisfy the Committee's statutory duty to protect the interests of unsecured creditors on

[9] *See* Dec. 8, 2025 Hr'g Tr. (K. Shepard Cross Examination) at 172:12-173:18.

the expedited timeline sought by the Debtors. This was necessary to ensure that unsecured creditors' interests were adequately represented. While Plan recoveries initially provided for *no* recovery to general unsecured creditors, as a result of the Committee's work, the Plan ultimately provided for a distribution to general unsecured creditors of their pro rata share of (i) 2% of the Debtors' new common interests (subject to dilution), new warrants, participation rights in an equity rights offering for eligible holders or (ii) a "cash-out" option for holders of claims less than $1,000,000 for a pro rata share of a pool of cash up to $32 million.

A. Committee Professionals Have Satisfied Their Burden Under Section 330

26. The professional seeking compensation under section 330 of the Bankruptcy Code bears the burden to establish a case in support of the fee award. 11 U.S.C. § 330(a)(3). A professional can satisfy its burden by submitting fee applications with sufficient information for the court to make a determination as to reasonableness. *See In re El Paso Refinery, L.P.*, 257 B.R. 809, 841 (Bankr. W.D. Tex. 2000) ("Normally, the fee application itself sets out evidence sufficient for a prima facie case that the final fee award sought to be approved is both reasonable and necessary within the meaning of the statute."). Once the applicant establishes a *prima facie* case that its fees are reasonable, any objecting party has the burden of demonstrating that specific fee requests are unreasonable. *Castorena v. Mendoza*, 2011 WL 13315708, at *5 (S.D. Tex. Mar. 14, 2011) ("Generalized statements that time spent was unreasonable or unnecessary are not particularly helpful and not entitled to much weight.") (internal quotations omitted). Courts in this District have previously recognized that vague objections to reasonableness do not satisfy this burden. *See, e.g.*, *In re MLCJR, LLC*, Case No. 23-90324 (Bankr. S.D. Tex. Sept. 25, 2024), Hr'g Tr. at 7:22-8:4 (noting that "[a] general complaint that too much time was spent . . . or a fee was too high, or creditors did not substantially recover . . . may not be enough to substantiate an objection").

27. White & Case has satisfied its burden to demonstrate that its fees are reasonable. As further evidenced in the fee applications, the Committee and its professionals played a vital role in ensuring that the rights of all unsecured creditors were fully represented, including through four distinct workstreams.

i. DIP Motion

28. White & Case conducted a comprehensive review of the proposed debtor-in-possession financing (the "DIP Facility") described in the *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] (the "DIP Motion"), which contained several provisions that the Committee viewed as objectionable, including:

a) Outsized fees to the DIP lenders, including the backstop fee equal to 20% of the equity in the reorganized Debtors (noting that the Debtors' own estimated total enterprise value was between $80 million and $126 million);

b) Extension of the DIP liens and adequate protections liens to unencumbered assets, including avoidance actions;

c) A waiver of section 506(c) of the Bankruptcy Code;

d) A waiver of the "equities of the case" exception to section 552(b) of the Bankruptcy Code;

e) A waiver of an ability to advocate for application of the doctrine of marshalling;

f) A compressed timeline for confirmation of the a chapter 11 plan;[10]

[10] The Court ultimately extended the timeline for confirmation of the chapter 11 cases after the Committee filed *The Official Committee of Unsecured Creditors' Emergency Motion for Entry of An Order (I) Scheduling Certain Dates and*

g) A limitation of the Committee's professional fees during the chapter 11 cases;

h) An insufficient $50,000 investigation budget for the Committee;

i) A professional escrow account where the Debtors would be required to borrow and pay interest on cash in escrow to fund the estimated future fees of estate professionals;

j) A stipulation by the Debtors that all of their cash constituted cash collateral of the prepetition secured creditors without any potential for investigation or challenge;

k) An increase in the secured creditors' prepetition interest rate as a form of adequate protection;

l) Confusing (at best) language regarding the ability to keep challenges live during the challenge period;

m) An unqualified right to credit bid for the prepetition agent under the first lien credit agreement (the "Prepetition First Lien Agent");

n) An automatic right for the DIP agent to exercise all remedies against DIP collateral with only a five-day notice period;

o) Full approval to and shield from challenge any and all fees on the DIP Facility paid prepetition; and

p) No requirement to provide notice to the Committee of immaterial amendments to the DIP Facility.

These provisions created a risk of depleting value that would otherwise be available to unsecured creditors and required thorough and careful review.

29. In furtherance of the Committee's statutory duties, White & Case, among other things, carefully reviewed the DIP Motion, the proposed final order to approve the DIP Motion

Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and Associated Proceedings, (II) Establishing Certain Protocols, and (III) Granting Related Relief [Docket No. 484] (the "**Scheduling Motion**").

(the "Final DIP Order") and the DIP Facility's credit agreement (the "DIP Credit Agreement"); conducted a detailed analysis of which entities were obligors and which assets were included or carved out of the proposed financing; assessed the propriety and scope of fees and other charges the Debtors sought to approve; provided proposed revisions to the Final DIP Order; negotiated these revisions with Debtors; conducted legal research related to outstanding issues; reviewed thousands of documents produced by the Debtors in response to the Committee's discovery requests; conducted two depositions of Debtor representatives; prepared the Committee's financial advisor for deposition; defended the deposition of the Committee's financial advisor; drafted and refined the Committee's objection to the DIP Motion [Docket No. 346] (the "DIP Objection"); assisted AlixPartners LLP ("AlixPartners") with its supporting declaration to the DIP Objection [Docket No. 349]; and prepared for the hearing on the Debtors' DIP Motion on September 30, 2025.

30. White & Case's work resulted in a revised proposed Final DIP Order, which, removed the Prepetition First Lien Agent's unqualified right to credit bid, required the DIP agent to seek relief from the automatic stay before exercising any remedies against the DIP Collateral, removed the cap on the Committee's professional fees and increased the Committee's investigation budget.

ii. UHC Settlement

31. All parties agreed from the beginning of these chapter 11 cases that the threatened loss of over $250 million in revenues from UHC would substantially reduce stakeholder recoveries. In response to the potential settlement between UHC and the Debtors described in the *Motion of Debtors for Entry of an Order Pursuant to Bankruptcy Rule 9019 (A) Approving a Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related*

Relief [Docket No. 439] (the "UHC Settlement"), the Committee sought informal discovery about UHC and their market reputation for terminating contracts (or threatening to) and then reengaging. During those informal interviews with the Debtors' management, the Debtors confirmed that they could not identify any potential replacement providers.

32. The Committee then served limited discovery to the Debtors (document requests and a deposition notice) and filed a limited objection to the UHC Settlement.[11] White & Case took one deposition of the Debtors' CRO, Chad Shandler. During his deposition, Mr. Shandler testified that (i) the loss of the UHC contracts would put the prepetition lenders under the Debtors' first lien credit agreement (collectively, the "First Lien Lenders") underwater, (ii) the Debtors had not identified potential replacement parties, (iii) he believed that the Debtors would identify the potential replacement parties prior to the termination date, and (iv) management expected that the Debtors would extend their existing contracts if replacement parties did not emerge by the termination date.

33. Given that testimony, the Committee raised the issue to the Court to address the material adverse consequences to the Committee's constituents' recoveries if the UHC contracts reappeared before the termination date or soon thereafter, and also to protect the legitimacy of the overall chapter 11 process. The Debtors did not provide updates to the transition process prior to the October 30, 2025 hearing.[12] The Committee's objection to the UHC Settlement, which it presented at the October 30, 2025 hearing ensured the critical issue of whether the UHC relationship was actually terminating was presented to the Court and protected everyone from

[11] *See The Official Committee of Unsecured Creditors' Preliminary Objection to the Motion of Debtors for Entry of An Order Pursuant to Bankruptcy Rule 9019 (A) Approving A Global Settlement Agreement By and Among the Debtors and UHC and (B) Granting Related Relief* [Docket No. 576] at ¶ 2.

[12] *See* Oct. 30, 2025 Hr'g Tr. at 86:5-87:13.

criticism if UHC reemerged. The Court reserved the Committee's rights to raise the issue at confirmation.[13]

34. The Debtors informed AlixPartners through early December that potential replacement parties were not yet identified.[14] But the Debtors apparently did get that information from a UHC representative shortly before the confirmation trial and the Debtors decided to make the disclosure (through hearsay statements) during the confirmation trial.[15]

iii. Investigation of Claims and Causes of Action

35. At the outset of these chapter 11 cases, the Debtors filed the Plan, which proposed—in exchange for *zero* recovery for unsecured creditors—the cancellation of more than half a billion of unsecured claims, and broad releases for no consideration for their directors, officers, and professionals, as well as those of the Consenting Creditors. This required a comprehensive investigation into potential estate claims and causes of action, including those relating to the liens under the Debtors' secured loans and the Debtors' prepetition transactions. Debtors' counsel, Latham & Watkins LLP ("Latham"), was initially conducting this investigation. But Latham had previously represented the former administrative agent under the prepetition first lien credit agreement.[16] It was only after the Committee was engaged and retained White & Case, and over three weeks after the Petition Date, that the Independent Director engaged Quinn to conduct this investigation.[17]

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13 *See id.* at 103:5-22.

14 *See* Dec. 8, 2025 Hr'g Tr. (K. Shepard Cross Examination) at 172:12-173:18.

15 *See id.*

16 *See Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Latham & Watkins LLP as Bankruptcy Co-Counsel Effective as of the Petition Date* [Docket No. 338-1] ¶ 30. Latham was not involved in the prepetition liability management transaction with the First Lien Lenders. *Id.*

17 *See Declaration of Daniel B. Silvers, Investigating Director of ModivCare Inc., in Support of Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 687] at ¶ 8 ("Because Latham formerly represented JPMorgan Chase Bank, N.A., which, until September 2025, had served as the administrative agent under the Company's credit agreement dated as of February 3, 2022…I determined to retain separate counsel to assist me in the Investigation. On

36. White & Case undertook a comprehensive investigation into these matters. Investigations like this are typical in large, complex chapter 11 cases, especially those involving failed liability management transactions that were consummated by the Debtors prior to the Petition Date. Assessing the viability of, and seeking standing to prosecute, claims and causes of action were especially important because they could have been the sole source of recovery for unsecured creditors, which were slated to receive nothing under the proposed Plan. For example, a successful challenge to the liability management transaction would have resulted in distribution to unsecured creditors with only minor adjustments to the Debtors' valuation.

37. In connection with the Lien Challenge (as defined below), White & Case reviewed the prepetition first lien and second lien loan documents and related collateral packages; analyzed the Debtors' unperfected assets; and conducted thorough lien perfection reviews for each Debtor, including specialized reviews related to the liens on the Debtors' intellectual property. Recognizing the unique challenges posed by the Debtors' healthcare-related assets, White & Case also researched perfection requirements for Medicare and Medicaid receivables. To further support the Lien Challenge, White & Case conducted numerous depositions and interviews to understand the Debtors' business operations and the extent to which post-petition revenue was generated by post-petition labor. Ultimately, the Committee found colorable claims in connection with the Lien Challenge and White & Case drafted and litigated the *Committee's Omnibus Claim Objection and Lien Challenge Standing Motion* [Docket No. 729] and the *First Supplement to the Committee's Omnibus Claim Objection and Lien Challenge Standing Motion* [Docket No. 806], which necessitated significant preparation in advance of the confirmation hearing.

September 15, 2025, at my direction, the Company retained Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel") for that purpose.").

38. The Committee also investigated sophisticated and complex prepetition transactions between the Debtors and their secured lenders, which demanded the highest level of diligence and expertise. Five months prior to the Petition Date, the Debtors completed an uptier transaction that increased their secured debt to approximately $1.7 billion through a dollar-for-dollar exchange of $271 million of unsecured notes for second-lien secured notes. As part of the investigation, White & Case deposed one of the Debtors' former independent board members who testified that the Debtors' management and restructuring advisors "seemed to be focused on . . . getting into bankruptcy" and the prospect of bankruptcy "overshadowed each and every aspect of what was happening" throughout his tenure on the board.[18]

39. The Committee had no choice but to thoroughly explore these issues. Accordingly, in connection with the Uptier Challenge (as defined below), White & Case conducted legal research into potential causes of action; conducted extensive discovery on the Debtors and First Lien Lenders, including reviewing thousands of documents relating to the Debtors' prepetition transactions and deposing several of the Debtors' former and current officers and directors; together with the Committee's financial advisor, analyzed the value of the consideration exchanged in the transactions; and drafted and litigated the Uptier Challenge [Docket No. 975]. White & Case also reviewed and researched potential causes of action related to the payments of prepetition bonuses and severance packages to Company employees.

40. White & Case also analyzed the adequacy of the Independent Director's own investigation into the Debtors' prepetition transactions, along with his associated conclusions and recommendations, to adequately assess the Debtors' exercise of their business judgment in granting broad releases under the Plan. This involved additional discovery and trial preparation,

[18] Gonzales Dep. Tr, 196:14-197:23.

along with a repeated need to seek Court intervention regarding the timing of the Independent Director's disclosures and assertions of privilege. The latter dispute ultimately resulted in the Court partially sustaining the Committee's objection to certain aspects of the Independent Director's testimony regarding the his investigation and conclusions.[19]

iv. Plan

41. White & Case conducted a thorough review and analysis of the Plan, Disclosure Statement, and Plan Supplement,[20] ensuring that all provisions were scrutinized for their impact on unsecured creditors. The valuation of the Debtors' business was at the center of these chapter 11 cases. The Debtors and the Consenting Creditors initially filed a Plan that provided no recovery to unsecured creditors without even conducting an expert valuation, much less a valuation that had been market tested. The Committee was required to hire its own experts to assess the Debtors' underlying business plan—which assessed each of the Debtors' operative business segments—and to determine and apply the appropriate valuation methodology to independently conclude whether the Debtors' presumption that unsecured creditors were out of the money was correct.

42. The Committee's experts found that it was not. With only certain adjustments to the business plan and taking appropriate valuation methodologies into account, the Committee believed that there could have been enough value to satisfy claims of the First Lien Lenders and the prepetition noteholders under the Debtors' second lien notes, with residual value flowing to

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[19] *See, e.g.*, Dec. 8, 2025 Hr'g. Tr. (D. Silvers' Direct Testimony) at 203:3-207:24; 220:18-24; 221:20-222:19; 223:16-21; 230:24-231:15.

[20] "**Plan Supplement**" refers, collectively to the *Notice of Filing of Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 725], *Notice of Filing of Second Plan Supplement for the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 802], *Notice of Filing of Third Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 961], *Notice of Filing of Fourth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 1030], *Notice of Filing of Fifth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 1094], and *Notice of Filing of Sixth Plan Supplement for the Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliate* [Docket No. 1130].

unsecured creditors.[21] This was without even considering any additional value that could have been recovered from the Lien Challenge and Uptier Challenge. Those challenges, if successful, would have showed that the Plan was incorrectly premised on the First Lien Lenders' secured claim being $881 million, which would have required a revision of the equity splits and, therefore, enhanced the proposed recovery to unsecured creditors.

43. White & Case conducted legal research related to the approval of the Plan and Disclosure Statement; closely examined the Independent Director's investigation and the scope and propriety of the Plan's proposed releases; drafted and filed the Disclosure Statement Objection (as defined below) and a supporting declaration [Docket No. 422]; assisted AlixPartners with the Committee's expert reports regarding the Debtors' business plan and valuation; and drafted and filed the Plan Objection (as defined below), advocating for the interests of unsecured creditors in light of the Plan's proposed treatment. In addition, the Committee provided numerous comments to the Debtors' pleadings and negotiated certain issues encompassed in the final orders for the Solicitation Procedures and Plan.

44. After extensive, good faith attempts to reach a consensual resolution, White & Case prepared for and participated in the multi-day hearing on the confirmation of the Plan, as well as the Uptier Challenge and Lien Challenge. Among other things, White & Case drafted the pleadings; prepared and conducted direct examinations, cross-examinations of each of the Debtors' witnesses, and oral argument; and finalized and negotiated exhibit lists and deposition designations. The four-day hearing included testimony by eight witnesses, including two Committee experts. The Court specifically found that the Committee's valuation expert testimony

[21] Mr. Gonzales testified that a "consistent problem with FTI" throughout his tenure on the board was that their forecasts were almost "always lower than actual." *See* Gonzales Dep. Tr. 121:8-12,. Mr. Gonzales testified to his belief that FTI's forecasts were low "80 or 90 percent" of the time and it was a "pattern" that he saw in their projections. *Id.* at 121:13-18; 173:20-24.

was credible.[22] White & Case's efforts were instrumental in ensuring that the Committee's voice was heard and that the interests of unsecured creditors were represented in a case where their recovery was initially non-existent. Ultimately, in part based on the work of the Committee's professionals, the recovery for general unsecured creditors increased to provide for (i) a pro rata share of 2% of the reorganized equity, a warrant package and participation rights for eligible holders in an equity rights offering, or (ii) for holders of claims less than $1,000,000, a "cash-out" option for a pro rata share of a $32 million pool.

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45. Throughout these chapter 11 cases, White & Case has filed thousands of pages of detailed time entries, all of which have been approved on an interim basis without formal objection from any party.[23] White & Case has been consistently transparent in its fee applications, providing the information and detail necessary for a presumption of reasonableness. White & Case has satisfied the standards for final allowance and payment of its fees.

TERMS AND CONDITIONS OF EMPLOYMENT AND COMPENSATION

46. The terms and conditions of White & Case's employment by the Debtors and compensation to be paid to White & Case by the Debtors are outlined in the Retention Application and Retention Order. Post-petition compensation paid to White & Case by the Debtors has been paid from the Debtors' estates, in accordance with the Compensation Procedures Order and applicable bankruptcy law.

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22 Dec. 12, 2025 Hr'g. Tr. at 8:21-24.

23 The Consenting Creditors filed a *Reservation of Rights of the Consenting Creditors With Respect to White & Case LLP's First Monthly Fee Statement For Allowance of Compensation And Reimbursement of Expenses For the Period From September 9, 2025 to and Including September 30, 2025, and First Monthly Fee Statement of Alixpartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, For Allowance Of Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred For the Period From September 10, 2025 Through September 30, 2025* [Docket No. 753], but did not file a formal objection.

PROFESSIONAL SERVICES PROVIDED BY WHITE & CASE TO THE COMMITTEE

47. White & Case has assisted the Committee in all matters in these chapter 11 cases. In support of this Application, White & Case submits the following:

A. A proposed final order allowing compensation and reimbursement of expenses in the form located on the Court's website.

B. With respect to the period from September 9, 2025 to December 29, 2025:

a. Detailed statements of White & Case's hours expended and fees earned are attached to the Prior Fee Statements, filed at Docket Nos. 684, 882, 957, and 1197;

b. A summary of White & Case's hours expended and fees earned grouped by timekeeper (attorneys and paraprofessionals), attached hereto as **Exhibit A**;

c. A summary of White & Case's hours expended and fees earned grouped by billing category only, attached hereto as **Exhibit B**;

d. A summary of White & Case's hours expended, and fees earned grouped by billing category and then by timekeeper (attorneys and paraprofessionals), attached hereto as **Exhibit C**;

e. Detailed statements of White & Case's expenses incurred are attached to the Prior Fee Statements, filed at Docket Nos. 684, 882, 957, and 1197. An additional detailed statement of White & Case's expenses incurred through December 29, 2025, but not included in the Prior Fee Statements, is attached hereto as **Exhibit D**; and

f. A summary of White & Case's expenses incurred is attached hereto as **Exhibit E**.

C. A summary chart disclosing the customary and comparable compensation is attached hereto as **Exhibit F**.

D. A certification by Gregory F. Pesce, a partner of White & Case, is attached hereto as **Exhibit G**.

48. The following is a brief narrative summary, by project category, of the most significant professional services provided by White & Case to the Committee during the Final

Period.[24] These descriptions—together with the time detail attached to its Prior Fee Statements—demonstrate that White & Case was heavily involved in performing services for the Committee on a daily basis, often including night and weekend work,[25] to meet the needs of the Committee in these chapter 11 cases.

No.	Category Name
	Brief Narrative Summary
B01	**Adversary Proceedings**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to potential adversary proceedings to be initiated by the Committee, which are summarized in greater detail in B16 and B17.
B02	**Asset Analysis, Sale & Disposition**
	White & Case attorneys analyzed the exhibits contained in the Plan Supplement referencing the sale and disposition of assets [Docket Nos. 725, 802, 961, 1030].
B03	**Automatic Stay Issues**
	White & Case attorneys worked on various matters including analyzing and assessing the various motions for relief from automatic stay filed in the chapter 11 cases [Docket Nos. 471, 657].
B04	**Case Administration**
	White & Case attorneys and paraprofessionals worked on various matters related to the management of the chapter 11 cases, including monitoring the docket, maintaining a case calendar of upcoming deadlines, and addressing and monitoring work in progress. White & Case attorneys corresponded and met regularly regarding the progress and current status of ongoing workstreams to ensure work was not being duplicated.
B05	**Case Strategy**
	Throughout the chapter 11 cases, White & Case attorneys advised the Committee with respect to strategy on several issues, including, but not limited to: (1) certain pending motions; (2) strategy related to DIP Financing & Cash Collateral [*see* project category B11]; (3) strategy related to Discovery [*see* project category B12]; (4) strategy related to the Plan

[24] The summary herein is divided according to the project categories that White & Case created to best reflect the categories of tasks that it was required to perform during the chapter 11 cases. Nevertheless, under the circumstances, and given the interconnectedness of the issues in the chapter 11 cases, certain of these categories may overlap with one another.

[25] Approximately 15.5% of the hours billed were billed on a Saturday or a Sunday.

	and Disclosure Statement [*see* project category B13]; and (5) strategy related to the Investigations and Lien Challenge [*see* project categories B16 and B17]; and (6) strategy related to potential settlement [*see* project categories B18]. Further, White & Case attorneys discussed many of the foregoing issues with the Debtors, the Consenting Creditors, and their respective advisors.
B06	**Cash Management & Intercompany Issues**
	White & Case attorneys and paraprofessionals worked on various matters related to Cash Management and Intercompany Issues, including: (1) analyzing and conducting research related to the Debtors' cash management motion and critical vendor motions [Docket Nos. 6, 16, 280] (collectively, the "Cash Management Motion and Critical Vendor Motion"); (2) revising the proposed final orders granting the Cash Management Motion and Critical Vendor Motion, then approved by the Court [Docket Nos. 334, 388, 394]; and (3) attending to calls and correspondence with Debtors' counsel regarding the Cash Management Motion and Critical Vendor Motion.
B07	**Claims Administration & Objections**
	Throughout the chapter 11 cases, White & Case attorneys worked on various matters related to the administration of claims in the chapter 11 cases, including, but not limited to (1) analyzing proofs of claim; (2) reviewing AlixPartners' analysis of the claims filed in the chapter 11 cases; (3) analyzing the Consenting Creditors' proofs of claim; (4) researching claim objection procedures; and (5) preparing the Lien Challenge Standing Motion (as defined herein), which is discussed in greater detail in B17.
B08	**Committee Meetings & Communications**
	Throughout the chapter 11 cases, White & Case attorneys (1) streamlined the Committee's financial advisor pitching process; (2) drafted the Committee's bylaws; (3) worked with AlixPartners in preparing weekly presentations to the Committee regarding the chapter 11 cases; (4) organized and attended weekly meetings with the Committee; (5) prepared minutes of weekly meetings with the Committee; and (6) maintained constant communication with Committee members throughout the chapter 11 cases.
B09	**Corporate, Securities & Regulatory Issues**
	Throughout the chapter 11 cases, White & Case attorneys analyzed the exhibits and revisions thereto contained in the Plan Supplement and conferred on various corporate, securities and regulatory issues [Docket Nos. 725, 802, 961, 1030].
B10	**Creditor Communications**
	Throughout the chapter 11 cases, White & Case attorneys met and conferred with counsel to the Consenting Creditors, communicated with individual Committee members regarding discussions with other constituents in the chapter 11 cases, and communicated with individual unsecured creditors regarding general case information.

B11	**DIP Financing & Cash Collateral**
	White & Case attorneys undertook various workstreams related to the Debtors' DIP Motion, including, but not limited to: (1) reviewing the DIP Motion; (2) analyzing the DIP Credit Agreement; (3) analyzing the entities obligated under the DIP Credit Agreement; (4) analyzing the assets included and excluded from the DIP Credit Agreement; (5) assessing the propriety of the various fees sought to be approved by the DIP Motion; (6) revising the Debtors' proposed Final DIP Order in order to resolve the Committee's issues; (7) meeting and conferring with the Debtors regarding the Committee's revisions to the proposed Final DIP Order; (8) drafting the DIP Objection, which was filed on September 23, 2025 [Docket No. 346]; (9) conducting various research workstreams in preparation of the DIP Objection; (8) conferring with AlixPartners and assisting in the preparation and filing of their declaration in support of the DIP Objection, which was filed on September 23, 2025 [Docket No. 349].
B12	**Discovery**
	Throughout the chapter 11 cases, White & Case attorneys undertook extensive discovery, including discovery related to the liens asserted on the Debtors' assets, the Debtors' prepetition transactions, the Debtors' DIP Motion, the Debtors' Plan and Disclosure Statements, and the UHC Settlement. Such discovery included reviewing over 30,000 documents, preparing for and conducting fourteen depositions, defending three depositions, and interviewing Company witnesses. Throughout this process, White & Case attorneys attended to various discovery disputes with the Debtors and Consenting Creditors, including by: (1) preparing for and attending several meet and confers and exchanging correspondences regarding their document productions; (2) negotiating interim deadlines and litigating an appropriate scheduling order; and (3) corresponding with Quinn, counsel to the Independent Director, regarding the Independent Director's investigation, and litigating remaining issues with the aid of this Court.
B13	**Exclusivity, Plan & Disclosure Statement**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to the Plan and Disclosure Statement, including, but not limited to: (1) reviewing the Plan, Disclosure Statement, and Plan Supplement; (2) analyzing the Independent Director's investigation and the Plan's proposed releases; (3) conducting various research related to approval of the Disclosure Statement; (4) drafting, finalizing, and filing the Committee's objection to the Disclosure Statement, which was filed on October 2, 2025 [Docket No. 421] (the "Disclosure Statement Objection"); (5) drafting, finalizing, and filing the declaration in support of the Disclosure Statement Objection, which was filed on October 2, 2025 [Docket No. 422]; (6) attending to various internal meetings and external calls with AlixPartners and the Committee regarding the Disclosure Statement Objection; (7) drafting, finalizing, and filing the Scheduling Motion, which was filed on October 9, 2025 [Docket No. 484]; (8) meeting with the Debtors and finalizing the agreed-upon order regarding the scheduling of confirmation dates and deadlines, which was filed on October 15, 2025 [Docket No. 546]; (9) conducting various research related to confirmation of the Plan; (10) drafting, finalizing, and filing the Committee's objection to confirmation of the

	Plan, which was filed on November 25, 2025 [Docket No. 851] (the "Plan Objection"); (11) attending to various internal meetings and external calls with AlixPartners and the Committee regarding the Plan Objection; and (12) preparing for the multi-day hearing on confirmation of the Plan.
B14	**Executory Contracts & Unexpired Leases**
	White & Case attorneys analyzed and assessed the Debtors' assumed and rejected executory contracts.
B15	**Hearings & Court Matters**
	Throughout the chapter 11 cases, White & Case attorneys and paraprofessionals prepared for and attended various hearings and status conferences, including, but not limited to: the contested DIP hearing on September 30, 2025; the Court's ruling on the DIP Motion on October 3, 2025; the status conference on the Confirmation schedule on October 10, 2025; the hearing on the UHC Settlement on October 30, 2025; hearings and status conferences regarding the Independent Director's declarations on November 21, 2025, November, 25, 2025, and December 3, 2025; and the contested Confirmation hearing from December 8, 2025 through December 12, 2025.
B16	**Investigation of Causes of Action**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to the investigation of causes of action, including, but not limited to: (1) reviewing the first lien and second lien credit documents and collateral packages; (2) analyzing the Debtors' unperfected assets; (3) conducting lien perfection reviews with respect to each Debtor; (4) conducting IP lien perfection reviews with respect to each Debtor; (5) researching perfection requirements with respect to Medicare and Medicaid Receivables; (6) researching perfection requirements with respect to cash and motor vehicles; (7) researching the application of section 552 of the Bankruptcy Code and its exceptions; (8) conducting various depositions and interviews with respect to the Debtors' business and the extent post-petition revenue is derived from post-petition labor; (9) drafting, finalizing and filing the Committee's Omnibus Claim Objection and Lien Challenge Standing Motion, which was filed on November 14, 2025 [Docket No. 729] (the "Lien Challenge Standing Motion"); (10) drafting, finalizing and filing the First Supplement to the Committee's Omnibus Claim Objection and Lien Challenge Standing Motion, which was filed on November 24, 2025 [Docket No. 806] (together with the Lien Challenge Standing Motion, the "Lien Challenge"); (11) analyzing the Debtors' and Consenting Creditors' replies to the Lien Challenge [Docket Nos. 921, 923, 925]; (12) drafting, finalizing and filing the Committee's Reply in Support of the Lien Challenge, which was filed on December 7, 2025 [Docket No. 975]; (13) analyzing the Debtors' prepetition transactions; (14) analyzing the Debtors' prepetition credit documents; (15) reviewing AlixPartners' analysis of the Debtors' prepetition transactions; (16) conducting various research workstreams related to the Debtors' prepetition transactions; (17) reviewing the Debtors' prepetition payments of bonuses and other compensation; (18) preparing for various depositions regarding the Debtors' prepetition transactions; (19) analyzing the Independent Director's declarations

	regarding the investigation into the Debtors' prepetition transactions [Docket Nos. 687, 803]; (20) drafting, finalizing and filing the Committee's Uptier Challenge Standing Motion, which was filed on November 14, 2025 [Docket No. 728] (the "Uptier Challenge"); (21) analyzing the Debtors' and Consenting Creditors' replies to the Uptier Challenge [Docket Nos. 921, 923, 925]; (22) drafting, finalizing and filing the Committee's Reply in support of the Uptier Challenge which was filed on December 7, 2025 [Docket No. 974]; and (23) attending to various internal calls and calls with AlixPartners and the Committee regarding the Lien Challenge and Uptier Challenge. Due to the nature of the investigations, there was extensive overlap between project categories B16 and B17.
B17	**Lien Challenge**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to Lien Challenge, including, but not limited to: (1) reviewing the first lien and second lien credit documents and collateral packages; (2) analyzing the Debtors' unperfected assets; (3) attending to various calls with AlixPartners' regarding analysis of the Debtors' perfected and unperfected assets; (4) researching the extent of perfection with respect to Medicare and Medicaid Receivables; (5) researching the application of section 552 of the Bankruptcy Code and its exceptions; (6) drafting, finalizing and filing the Lien Challenge [Docket Nos. 729, 806]; (7) analyzing the Debtors' and Consenting Creditors' replies to the Lien Challenge [Docket Nos. 921, 923, 925]; and (8) drafting, finalizing and filing the Committee's Reply in Support of the Lien Challenge, which was filed on December 7, 2025 [Docket No. 975]. Due to the nature of the Lien Challenge, there was extensive overlap between project categories B16 and B17.
B18	**Mediation**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to mediation and settlement efforts with the Debtors, including, but not limited to: (1) attending meetings internally and with AlixPartners for settlement meeting preparations; (2) attending meetings with the Committee regarding the status of settlements; (3) analyzing the Plan, Disclosure Statement and liquidation analysis in preparation for settlement meeting [Docket Nos. 445, 446, 452]; (4) preparing materials for settlement meetings; (5) attending calls with Debtors' and Consenting Creditors' professionals regarding settlement meetings; (5) attending settlement meetings; (6) analyzing and assessing settlement proposals; and (7) preparing settlement counterproposals.
B19	**Non-Working Travel**
	White & Case attorneys traveled to/from Houston, Texas to attend Court hearings.
B20	**Professional Retention & Fees – W&C**

	Throughout the chapter 11 cases, White & Case attorneys and paraprofessionals undertook various workstreams related to its retention and fees, including, but not limited to: (1) preparing and filing a retention application for White & Case [Docket No. 562], which retention was approved by the Court on October 31, 2025 [Docket No. 616]; (2) addressing issues raised by the U.S. Trustee with respect to White & Case's retention; (3) preparing and filing a supplemental declaration in support of White & Case's retention [Docket No. 593]; (4) preparing and filing additional supplemental declarations in support of retention [Docket Nos. 964, 956, 1079]; (5) preparing and filing four Monthly Fee Statements [Docket Nos. 684, 882, 957, 1197], preparing and filing one Interim Fee Application [Docket No. 1000], and this Application; and (5) addressing certain budgetary and fee estimate issues.
B21	**Professional Retention & Fees – Other**
	Throughout the chapter 11 cases, White & Case attorneys undertook various workstreams related to other professionals' retention and fees, including, but not limited to: (1) analyzing and filing the retention application for AlixPartners [Docket No. 473], which retention was approved by the Court on November 4, 2025 [Docket No. 654]; (2) analyzing and filing the supplemental declaration in support of AlixPartners' retention [Docket No. 643]; (3) analyzing and filing AlixPartners' three Monthly Fee Statements [Docket Nos. 666, 897, 1086]; (3) analyzing the retention applications for the Debtors' professionals; and (4) conferring internally and with the Debtors with respect to their retention applications.
B22	**Reports, Schedules & US Trustee Issues**
	Throughout the chapter 11 cases, White & Case attorneys worked on various matters, including preparing for and attending the Section 341 Meeting, analyzing the Debtors' Schedules and Statements of Financial Affairs, and reviewing AlixPartners' analysis of the Debtors' schedules and statements of financial affairs.
B23	**Tax Issues**
	Throughout the chapter 11 cases, White & Case attorneys worked on various tax-related matters.

49. In the ordinary course of White & Case's practice, White & Case maintains a record of expenses incurred in the rendition of professional services required by the Committee for which reimbursement is sought. As noted above, a summary of White & Case's expenses is attached as **Exhibit E**, with the detailed statement of same attached to the Prior Fee Statements and hereto as **Exhibit D**. The expenses incurred for which White & Case seeks reimbursement include, but are not limited to, discovery and e-discovery expenses, travel expenses, and printing expenses. These

charges are intended to reimburse White & Case's direct operating costs, which are not incorporated into White & Case's hourly billing rates. White & Case charges external costs at the vendor's cost without markup.

50. Although White & Case has made every effort to include all fees earned and expenses incurred during the Final Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Final Period. White & Case reserves the right to make further applications or to supplement this Application to this Court for allowance of such fees and expenses not included herein.

ALLOWANCE OF THE FEES AND EXPENSES

51. In this Application, White & Case seeks final allowance and payment of compensation for professional services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the Final Period.

52. The blended rates for all White & Case timekeepers for the Final Period is $1,414.

53. In support of the Application, White & Case relies upon its Prior Fee Statements and Interim Fee Application, which are incorporated herein by reference.

54. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 1103 of the Bankruptcy Code (such as counsel to the Committee) "reasonable compensation for actual, necessary services rendered . . . [and] reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1)(A)-(a)(1)(B). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

> In determining the amount of reasonable compensation to be awarded . . . , the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

> (a) the time spent on such services;
>
> (b) the rates charged for such services;
>
> (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
>
> (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
>
> (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
>
> (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

55. The Application readily meets the standards of section 330 and applicable case law for compensation for services rendered on behalf of the Committee.

56. White & Case respectfully submits that the foregoing professional services for which it seeks compensation in this Application were, at the time rendered, reasonable, necessary for, beneficial to, and appropriate to the Committee, the Debtors, their estates, and the administration of these chapter 11 cases. White & Case further believes that it performed the services for the Committee economically, effectively, and efficiently, and the results obtained benefited not only the Committee and its constituents, but also the Debtors' estates. White & Case further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Committee and all parties in interest.

57. During the Final Period, White & Case's U.S. hourly billing rates for attorneys (though not necessarily billed to the Debtors' estates) ranged from $870 to $2,500. The hourly rates and corresponding rate structure utilized by White & Case in these chapter 11 cases are equivalent to the hourly rates and corresponding rate structure used by White & Case for

restructuring, workout, bankruptcy, insolvency, and comparable matters, and similar complex corporate, securities, and litigation matters, whether in court or otherwise, regardless of whether a fee application is required. White & Case strives to be efficient in the staffing of matters. These rates and the rate structure reflect that such matters are typically national in scope and involve great complexity, high stakes, and severe time pressures—all of which were present in these chapter 11 cases.

58. Moreover, White & Case's hourly rates are set at a level designed to compensate White & Case fairly for the work of its attorneys and paraprofessionals and to cover certain fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of the individuals assigned. These hourly rates are subject to periodic adjustments to reflect economic and other conditions and are consistent with the rates charged elsewhere.

59. Over 83% of the hours worked were by attorneys within White & Case's Financial Restructuring and Insolvency Practice, a practice which enjoys a national and international reputation for its expertise in financial restructurings. Overall, White & Case brings to these chapter 11 cases a particularly high level of skill and knowledge, which inured to the benefit of the Committee and all parties in interest.

60. In conclusion, the services provided by White & Case have been necessary to the Committee's role in these chapter 11 cases during the Final Period, and were beneficial at the time at which the services were rendered toward the successful prosecution of the unsecured creditors' interests in these chapter 11 cases. Further, White & Case performed the services within a reasonable amount of time commensurate with the complexity, importance, nature of the problems, issues, and tasks addressed on behalf of the Committee. Finally, the compensation sought is reasonable based on the customary compensation charged by comparably skilled practitioners in

chapter 11 cases. White & Case requests that the Court determine that the nature, extent, and value of these services were appropriate under the circumstances at the time the services were rendered.

61. As a result of the services provided, White & Case incurred expenses which it billed. The disbursements for such services are not included in White & Case's overhead for the purpose of setting billing rates and White & Case has made every effort to minimize its disbursements in these chapter 11 cases. The actual expenses incurred in providing professional services were necessary, reasonable, and justified under the circumstances to serve the needs of the Debtors in these chapter 11 cases. Among other things, White & Case makes sure that all expenses for which it seeks reimbursement were reasonable and appropriate.

WHEREFORE, White & Case requests that this Court enter an order granting final allowance and payment of compensation for professional services provided in the amount of $13,893,521.00 and reimbursement of actual and necessary expenses in the amount of $300,469.13 that were incurred for the Final Period.

Dated: February 12, 2026
Houston, Texas

/s/ Charles R. Koster

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Counsel for the Official Committee of Unsecured Creditors

CERTIFICATE OF SERVICE

I certify that on February 12, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster

Exhibit A

Summary of Total Hours and Fees by Timekeeper

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Abouhashish, Salma	Associate	2023	Pool Associates - Corporate	16.0	$870.00	$13,920.00
Ahmed, Heidi	Associate	2024	Capital Markets Practice	6.0	$990.00	$5,940.00
Aquije, Alonso	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	157.1	$1,110.00	$174,381.00
Bagdasarian, Amy	Associate	2003	Debt Finance Practice	13.9	$1,580.00	$21,962.00
Beil, Ryan	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	378.2	$1,280.00	$484,096.00
Binuya, Sebastian Angelo	Litigation Specialist	N/A	Practice Technology - Disputes	0.5	$420.00	$210.00
Bourgault, Jacob	Associate	2025	Pool Associates - Corporate	593.3	$870.00	$516,171.00
Chase, Ashley	Associate	2016	Financial Restructuring & Insolvency (FRI) Practice	693.7	$1,580.00	$1,096,046.00
Chemborisov, Gleb	Litigation Specialist	N/A	Timekeeper Pool	68.8	$490.00	$33,712.00
Chen, Ken	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	79.5	$490.00	$38,955.00
Chen, Tony	Manager of Litigation Support	N/A	Timekeeper Pool	3.2	$490.00	$1,568.00
Chitwan, Charu	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	332.7	$1,110.00	$369,297.00
Dreier, David	Partner	1995	Tax Practice	0.8	$2,350.00	$1,880.00
Ericksen, A.J.	Partner	2005	Securities Practice	15.4	$2,200.00	$33,880.00
Fajar, Jimmy	Associate Director	N/A	Timekeeper Pool	1.4	$540.00	$756.00
Feld, Elizabeth	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	7.3	$1,790.00	$13,067.00
Galvan, Paolo	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	1.0	$420.00	$420.00
Gee, Steven	Partner	2009	Tax Practice	1.4	$1,900.00	$2,660.00
Gorsich, Ronald	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	2.5	$1,900.00	$4,750.00
Graham, Richard	Counsel	2003	Financial Restructuring & Insolvency (FRI) Practice	1.1	$1,630.00	$1,793.00
Greissman, Scott	Partner	1995	Financial Restructuring & Insolvency (FRI) Practice	411.3	$2,500.00	$1,028,250.00
Hirshorn, Deanna	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	59.7	$490.00	$29,253.00
Hong, Alice	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	448.6	$1,370.00	$614,582.00
Isaac, Chantal	Associate	N/A	Pool Associates - Corporate	223.2	$870.00	$194,184.00
Kakani, Bhavini	Associate	2025	Litigation Practice	257.3	$870.00	$223,851.00
Kates, Paula	Associate	2020	Litigation Practice	7.4	$1,370.00	$10,138.00
Koster, Charles	Partner	2009	Financial Restructuring & Insolvency (FRI) Practice	110.2	$1,900.00	$209,380.00

Name	Title	Year Adm.	Areas of Expertise	Hours	Rate	Fees
Lingle, Barrett	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	159.8	$1,370.00	$218,926.00
Litz, Dominic	Associate	2018	Financial Restructuring & Insolvency (FRI) Practice	349.1	$1,370.00	$478,267.00
Ludovici, Stephen	Staff Attorney	2014	Financial Restructuring & Insolvency (FRI) Practice	70.6	$1,110.00	$78,366.00
Lupinacci, Frank	Partner	2008	M&A - Private Equity Practice	18.1	$1,900.00	$34,390.00
Magnaye, Maclin	Litigation Specialist	N/A	Practice Technology - Disputes	1.0	$420.00	$420.00
Mago, Don	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	295.4	$990.00	$292,446.00
McNary, Mary Jane	Legal Assistant	N/A	Litigation Practice	1.2	$420.00	$504.00
Miranda, Loredana	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	787.6	$1,220.00	$960,872.00
Morales, Jon	Project Manager - Litigation Support	N/A	Practice Technology - Disputes	0.5	$490.00	$245.00
Pados, Gyorgy	Associate Director	N/A	Timekeeper Pool	3.3	$540.00	$1,782.00
Pesce, Gregory	Partner	2011	Financial Restructuring & Insolvency (FRI) Practice	211.8	$2,100.00	$444,780.00
Quintana, Anastasia	Associate	N/A	Pool Associates - Litigation	203.5	$870.00	$177,045.00
Rai, Parm	Associate	2024	Debt Finance Practice	23.8	$1,110.00	$26,418.00
Sachdev, Varoon	Associate	2018	Financial Restructuring & Insolvency (FRI) Practice	262.0	$1,420.00	$372,040.00
Shore, Christopher	Partner	1992	Financial Restructuring & Insolvency (FRI) Practice	534.9	$2,500.00	$1,337,250.00
Silnicki, Graham	Associate	2013	Debt Finance Practice	19.8	$1,470.00	$29,106.00
Slattery, Christine	Legal Assistant	N/A	Debt Finance Practice	26.2	$700.00	$18,340.00
Smith, Erin	Counsel	2014	Financial Restructuring & Insolvency (FRI) Practice	604.3	$1,630.00	$985,009.00
Venes, Aileen	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	61.5	$490.00	$30,135.00
Walz, Jacko	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	481.9	$870.00	$419,253.00
West, Colin	Partner	2008	Financial Restructuring & Insolvency (FRI) Practice	326.1	$1,790.00	$583,719.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	218.3	$490.00	$106,967.00
Yoo, Jade	Associate	2020	Financial Restructuring & Insolvency (FRI) Practice	206.5	$1,370.00	$282,905.00
Yu, Emily	Legal Assistant	N/A	Litigation Practice	1.8	$420.00	$756.00
Zahiremami, Golshid	Associate	2025	Financial Restructuring & Insolvency (FRI) Practice	345.2	$990.00	$341,748.00
Zakia, Jason	Partner	1999	Financial Restructuring & Insolvency (FRI) Practice	343.1	$2,200.00	$754,820.00
Zatz, Andrew	Partner	2008	Financial Restructuring & Insolvency (FRI) Practice	377.1	$2,100.00	$791,910.00
Grand Total				**9,825.9**		**$13,893,521.00**

Exhibit B

Summary of Total Hours and Fees by Billing Category

Cat. No.	Project Category Description	Total Hours	Total Fees
B01	Adversary Proceedings	8.8	$7,656.00
B02	Asset Analysis, Sale & Disposition	1.4	$2,660.00
B03	Automatic Stay Issues	4.5	$8,161.00
B04	Case Administration	154.8	$131,812.00
B05	Case Strategy	268.2	$500,054.00
B06	Cash Management & Intercompany Issues	24.0	$42,195.00
B07	Claims Administration & Objections	35.2	$44,656.00
B08	Committee Meetings & Communications	207.8	$364,318.00
B09	Corporate, Securities & Regulatory Issues	14.4	$26,733.00
B10	Creditor Communications	11.7	$19,821.00
B11	DIP Financing & Cash Collateral	503.1	$828,944.00
B12	Discovery	3,328.9	$4,295,633.00
B13	Exclusivity, Plan & Disclosure Statement	1,971.8	$2,759,882.00
B14	Executory Contracts & Unexpired Leases	8.3	$8,328.00
B15	Hearings & Court Matters	705.0	$1,251,067.00
B16	Investigation of Causes of Action	2,027.9	$2,807,492.00
B17	Lien Challenge	121.0	$139,526.00
B18	Mediation	186.8	$353,426.00
B19	Non-Working Travel	37.4	$66,382.00
B20	Professional Retention & Fees - W&C	167.8	$184,752.00
B21	Professional Retention & Fees - Other	29.0	$35,490.00
B22	Reports, Schedules & US Trustee Issues	5.7	$9,573.00
B23	Tax Issues	2.4	$4,960.00
	Grand Total	**9,825.9**	**$13,893,521.00**

Exhibit C

Summary of Total Hours and Fees by Billing Category and Timekeeper

Cat. No. Project Category Description Name	Hours	Fees
B01	**8.8**	**$7,656.00**
Adversary Proceedings	**8.8**	**$7,656.00**
Bourgault, Jacob	8.8	$7,656.00
B02	**1.4**	**$2,660.00**
Asset Analysis, Sale & Disposition	**1.4**	**$2,660.00**
Lupinacci, Frank	1.4	$2,660.00
B03	**4.5**	**$8,161.00**
Automatic Stay Issues	**4.5**	**$8,161.00**
Gorsich, Ronald	2.5	$4,750.00
Litz, Dominic	1.3	$1,781.00
Shore, Christopher	0.4	$1,000.00
Zatz, Andrew	0.3	$630.00
B04	**154.8**	**$131,812.00**
Case Administration	**154.8**	**$131,812.00**
Beil, Ryan	1.5	$1,920.00
Chitwan, Charu	0.4	$444.00
Greissman, Scott	0.6	$1,500.00
Hirshorn, Deanna	12.4	$6,076.00
Hong, Alice	2.5	$3,425.00
Isaac, Chantal	0.6	$522.00
Koster, Charles	0.5	$950.00
Lingle, Barrett	2.8	$3,836.00
Litz, Dominic	6.1	$8,357.00
Mago, Don	40.4	$39,996.00
Miranda, Loredana	8.3	$10,126.00
Sachdev, Varoon	5.5	$7,810.00
Smith, Erin	4.2	$6,846.00
Venes, Aileen	10.0	$4,900.00
Walz, Jacko	4.0	$3,480.00
Wick, Katie	43.6	$21,364.00
Zahiremami, Golshid	9.6	$9,504.00
Yu, Emily	1.8	$756.00
B05	**268.2**	**$500,054.00**
Case Strategy	**268.2**	**$500,054.00**
Aquije, Alonso	0.8	$888.00
Beil, Ryan	6.7	$8,576.00
Bourgault, Jacob	1.3	$1,131.00
Chase, Ashley	6.7	$10,586.00
Chemborisov, Gleb	0.5	$245.00
Chitwan, Charu	1.3	$1,443.00
Greissman, Scott	17.2	$43,000.00
Hong, Alice	3.1	$4,247.00
Isaac, Chantal	2.0	$1,740.00
Kakani, Bhavini	0.8	$696.00
Koster, Charles	2.6	$4,940.00
Lingle, Barrett	7.6	$10,412.00

Cat. No. Project Category Description Name	Hours	Fees
Litz, Dominic	19.8	$27,126.00
Mago, Don	15.7	$15,543.00
Miranda, Loredana	7.6	$9,272.00
Pesce, Gregory	73.1	$153,510.00
Quintana, Anastasia	5.7	$4,959.00
Sachdev, Varoon	10.5	$14,910.00
Shore, Christopher	32.5	$81,250.00
Walz, Jacko	1.2	$1,044.00
Yoo, Jade	3.7	$5,069.00
Zahiremami, Golshid	1.3	$1,287.00
Zakia, Jason	5.3	$11,660.00
Zatz, Andrew	41.2	$86,520.00
B06	**24.0**	**$42,195.00**
Cash Management & Intercompany Issues	**24.0**	**$42,195.00**
Beil, Ryan	2.8	$3,584.00
Greissman, Scott	4.4	$11,000.00
Lingle, Barrett	1.5	$2,055.00
Litz, Dominic	0.2	$274.00
Mago, Don	5.6	$5,544.00
Shore, Christopher	1.2	$3,000.00
West, Colin	0.8	$1,432.00
Zahiremami, Golshid	0.4	$396.00
Zatz, Andrew	7.1	$14,910.00
B07	**35.2**	**$44,656.00**
Claims Administration & Objections	**35.2**	**$44,656.00**
Graham, Richard	1.1	$1,793.00
Greissman, Scott	0.1	$250.00
Lingle, Barrett	0.7	$959.00
Litz, Dominic	1.0	$1,370.00
Mago, Don	16.1	$15,939.00
Sachdev, Varoon	6.5	$9,230.00
Shore, Christopher	0.7	$1,750.00
Walz, Jacko	4.5	$3,915.00
Zatz, Andrew	4.5	$9,450.00
B08	**207.8**	**$364,318.00**
Committee Meetings & Communications	**207.8**	**$364,318.00**
Beil, Ryan	1.6	$2,048.00
Chase, Ashley	10.8	$17,064.00
Greissman, Scott	26.4	$66,000.00
Hong, Alice	4.1	$5,617.00
Koster, Charles	4.5	$8,550.00
Lingle, Barrett	6.3	$8,631.00
Litz, Dominic	30.2	$41,374.00
Mago, Don	23.6	$23,364.00
Miranda, Loredana	11.5	$14,030.00
Pesce, Gregory	10.0	$21,000.00
Sachdev, Varoon	6.6	$9,372.00
Shore, Christopher	25.4	$63,500.00
Smith, Erin	11.7	$19,071.00
West, Colin	2.3	$4,117.00
Wick, Katie	0.6	$294.00

Cat. No. Project Category Description Name	Hours	Fees
Yoo, Jade	2.3	$3,151.00
Zahiremami, Golshid	5.5	$5,445.00
Zakia, Jason	4.5	$9,900.00
Zatz, Andrew	19.9	$41,790.00
B09	**14.4**	**$26,733.00**
Corporate, Securities & Regulatory Issues	**14.4**	**$26,733.00**
Abouhashish, Salma	3.9	$3,393.00
Ericksen, A.J.	9.7	$21,340.00
Greissman, Scott	0.8	$2,000.00
B10	**11.7**	**$19,821.00**
Creditor Communications	**11.7**	**$19,821.00**
Beil, Ryan	7.2	$9,216.00
Greissman, Scott	3.8	$9,500.00
Litz, Dominic	0.5	$685.00
Zatz, Andrew	0.2	$420.00
B11	**503.1**	**$828,944.00**
DIP Financing & Cash Collateral	**503.1**	**$828,944.00**
Aquije, Alonso	6.7	$7,437.00
Beil, Ryan	42.5	$54,400.00
Chase, Ashley	14.3	$22,594.00
Greissman, Scott	46.8	$117,000.00
Isaac, Chantal	4.3	$3,741.00
Koster, Charles	12.3	$23,370.00
Lingle, Barrett	33.9	$46,443.00
Litz, Dominic	35.7	$48,909.00
Mago, Don	30.7	$30,393.00
Miranda, Loredana	67.7	$82,594.00
Pesce, Gregory	48.5	$101,850.00
Sachdev, Varoon	2.3	$3,266.00
Shore, Christopher	26.1	$65,250.00
Smith, Erin	9.3	$15,159.00
Yoo, Jade	0.3	$411.00
Zahiremami, Golshid	47.3	$46,827.00
Zakia, Jason	30.6	$67,320.00
Zatz, Andrew	43.8	$91,980.00
B12	**3,328.9**	**$4,295,633.00**
Discovery	**3,328.9**	**$4,295,633.00**
Aquije, Alonso	140.2	$155,622.00
Beil, Ryan	0.5	$640.00
Binuya, Sebastian Angelo	0.5	$210.00
Bourgault, Jacob	371.2	$322,944.00
Chase, Ashley	262.7	$415,066.00
Chemborisov, Gleb	68.3	$33,467.00
Chen, Ken	79.5	$38,955.00
Chen, Tony	3.2	$1,568.00
Chitwan, Charu	196.9	$218,559.00
Galvan, Paolo	1.0	$420.00
Greissman, Scott	94.8	$237,000.00
Hong, Alice	171.3	$234,681.00
Isaac, Chantal	165.6	$144,072.00
Kakani, Bhavini	159.4	$138,678.00

Cat. No. Project Category Description Name	Hours	Fees
Kates, Paula	7.4	$10,138.00
Koster, Charles	8.1	$15,390.00
Litz, Dominic	0.7	$959.00
Magnaye, Maclin	1.0	$420.00
Mago, Don	0.1	$99.00
McNary, Mary Jane	1.2	$504.00
Miranda, Loredana	277.3	$338,306.00
Morales, Jon	0.5	$245.00
Pesce, Gregory	9.2	$19,320.00
Quintana, Anastasia	156.9	$136,503.00
Sachdev, Varoon	2.5	$3,550.00
Shore, Christopher	189.4	$473,500.00
Smith, Erin	389.9	$635,537.00
Venes, Aileen	0.8	$392.00
Walz, Jacko	282.6	$245,862.00
West, Colin	14.6	$26,134.00
Wick, Katie	46.2	$22,638.00
Yoo, Jade	47.6	$65,212.00
Zahiremami, Golshid	19.6	$19,404.00
Zakia, Jason	147.5	$324,500.00
Zatz, Andrew	6.0	$12,600.00
Fajar, Jimmy	1.4	$756.00
Pados, Gyorgy	3.3	$1,782.00
B13	**1,971.8**	**$2,759,882.00**
Exclusivity, Plan & Disclosure Statement	**1,971.8**	**$2,759,882.00**
Abouhashish, Salma	12.1	$10,527.00
Aquije, Alonso	3.0	$3,330.00
Beil, Ryan	59.9	$76,672.00
Bourgault, Jacob	131.9	$114,753.00
Chase, Ashley	109.2	$172,536.00
Chitwan, Charu	87.7	$97,347.00
Ericksen, A.J.	5.7	$12,540.00
Feld, Elizabeth	0.5	$895.00
Greissman, Scott	50.5	$126,250.00
Hirshorn, Deanna	36.7	$17,983.00
Hong, Alice	123.8	$169,606.00
Isaac, Chantal	30.7	$26,709.00
Kakani, Bhavini	75.9	$66,033.00
Koster, Charles	25.3	$48,070.00
Lingle, Barrett	95.7	$131,109.00
Litz, Dominic	15.1	$20,687.00
Lupinacci, Frank	16.7	$31,730.00
Mago, Don	32.6	$32,274.00
Miranda, Loredana	172.8	$210,816.00
Pesce, Gregory	31.2	$65,520.00
Quintana, Anastasia	26.3	$22,881.00
Sachdev, Varoon	34.1	$48,422.00
Shore, Christopher	135.8	$339,500.00
Smith, Erin	113.5	$185,005.00
Venes, Aileen	36.6	$17,934.00
Walz, Jacko	69.0	$60,030.00

Cat. No. Project Category Description Name	Hours	Fees
West, Colin	54.9	$98,271.00
Wick, Katie	101.2	$49,588.00
Yoo, Jade	125.2	$171,524.00
Zahiremami, Golshid	7.0	$6,930.00
Zakia, Jason	68.9	$151,580.00
Zatz, Andrew	82.3	$172,830.00
B14	**8.3**	**$8,328.00**
Executory Contracts & Unexpired Leases	**8.3**	**$8,328.00**
Mago, Don	2.7	$2,673.00
Zahiremami, Golshid	5.5	$5,445.00
Zatz, Andrew	0.1	$210.00
B15	**705.0**	**$1,251,067.00**
Hearings & Court Matters	**705.0**	**$1,251,067.00**
Aquije, Alonso	1.4	$1,554.00
Bourgault, Jacob	27.6	$24,012.00
Chase, Ashley	77.0	$121,660.00
Chitwan, Charu	7.6	$8,436.00
Greissman, Scott	68.5	$171,250.00
Hirshorn, Deanna	5.9	$2,891.00
Hong, Alice	9.4	$12,878.00
Koster, Charles	53.9	$102,410.00
Lingle, Barrett	3.2	$4,384.00
Litz, Dominic	0.8	$1,096.00
Mago, Don	1.2	$1,188.00
Miranda, Loredana	40.8	$49,776.00
Sachdev, Varoon	3.8	$5,396.00
Shore, Christopher	92.7	$231,750.00
Smith, Erin	71.9	$117,197.00
Venes, Aileen	0.6	$294.00
Walz, Jacko	48.2	$41,934.00
West, Colin	55.8	$99,882.00
Wick, Katie	20.3	$9,947.00
Yoo, Jade	4.9	$6,713.00
Zahiremami, Golshid	0.1	$99.00
Zakia, Jason	65.8	$144,760.00
Zatz, Andrew	43.6	$91,560.00
B16	**2,027.9**	**$2,807,492.00**
Investigation of Causes of Action	**2,027.9**	**$2,807,492.00**
Ahmed, Heidi	6.0	$5,940.00
Aquije, Alonso	5.0	$5,550.00
Bagdasarian, Amy	5.1	$8,058.00
Beil, Ryan	221.7	$283,776.00
Bourgault, Jacob	52.5	$45,675.00
Chase, Ashley	207.6	$328,008.00
Chitwan, Charu	38.8	$43,068.00
Feld, Elizabeth	6.8	$12,172.00
Greissman, Scott	44.1	$110,250.00
Hirshorn, Deanna	1.1	$539.00
Hong, Alice	133.0	$182,210.00
Isaac, Chantal	15.8	$13,746.00
Kakani, Bhavini	21.2	$18,444.00

Cat. No. Project Category Description Name	Hours	Fees
Koster, Charles	0.4	$760.00
Lingle, Barrett	0.9	$1,233.00
Litz, Dominic	186.6	$255,642.00
Ludovici, Stephen	0.2	$222.00
Mago, Don	109.3	$108,207.00
Miranda, Loredana	178.4	$217,648.00
Pesce, Gregory	27.2	$57,120.00
Quintana, Anastasia	14.6	$12,702.00
Rai, Parm	12.1	$13,431.00
Sachdev, Varoon	153.7	$218,254.00
Shore, Christopher	0.9	$2,250.00
Silnicki, Graham	9.5	$13,965.00
Slattery, Christine	0.5	$350.00
Venes, Aileen	5.7	$2,793.00
Walz, Jacko	53.9	$46,893.00
West, Colin	195.5	$349,945.00
Wick, Katie	0.6	$294.00
Yoo, Jade	21.2	$29,044.00
Zahiremami, Golshid	186.7	$184,833.00
Zakia, Jason	7.4	$16,280.00
Zatz, Andrew	103.9	$218,190.00
B17	**121.0**	**$139,526.00**
Lien Challenge	**121.0**	**$139,526.00**
Bagdasarian, Amy	8.8	$13,904.00
Beil, Ryan	21.3	$27,264.00
Hirshorn, Deanna	1.0	$490.00
Isaac, Chantal	4.2	$3,654.00
Lingle, Barrett	2.0	$2,740.00
Litz, Dominic	0.3	$411.00
Mago, Don	4.6	$4,554.00
Miranda, Loredana	6.4	$7,808.00
Rai, Parm	11.7	$12,987.00
Sachdev, Varoon	12.7	$18,034.00
Silnicki, Graham	10.3	$15,141.00
Slattery, Christine	25.7	$17,990.00
Wick, Katie	1.1	$539.00
Zahiremami, Golshid	8.0	$7,920.00
Zatz, Andrew	2.9	$6,090.00
B18	**186.8**	**$353,426.00**
Mediation	**186.8**	**$353,426.00**
Beil, Ryan	4.1	$5,248.00
Chase, Ashley	2.5	$3,950.00
Greissman, Scott	42.4	$106,000.00
Hong, Alice	1.4	$1,918.00
Koster, Charles	0.4	$760.00
Lingle, Barrett	1.3	$1,781.00
Litz, Dominic	34.0	$46,580.00
Mago, Don	12.4	$12,276.00
Miranda, Loredana	3.0	$3,660.00
Pesce, Gregory	12.6	$26,460.00
Sachdev, Varoon	23.6	$33,512.00

Cat. No. Project Category Description Name	Hours	Fees
Shore, Christopher	21.0	$52,500.00
Smith, Erin	1.3	$2,119.00
Walz, Jacko	0.2	$174.00
West, Colin	2.2	$3,938.00
Zakia, Jason	13.1	$28,820.00
Zatz, Andrew	11.3	$23,730.00
B19	**37.4**	**$66,382.00**
Non-Working Travel	**37.4**	**$66,382.00**
Chase, Ashley	1.8	$2,844.00
Greissman, Scott	6.8	$17,000.00
Miranda, Loredana	9.5	$11,590.00
Shore, Christopher	8.8	$22,000.00
Walz, Jacko	7.4	$6,438.00
Zatz, Andrew	3.1	$6,510.00
B20	**167.8**	**$184,752.00**
Professional Retention & Fees - W&C	**167.8**	**$184,752.00**
Beil, Ryan	8.4	$10,752.00
Greissman, Scott	3.2	$8,000.00
Hirshorn, Deanna	2.0	$980.00
Koster, Charles	1.8	$3,420.00
Lingle, Barrett	0.6	$822.00
Litz, Dominic	13.9	$19,043.00
Ludovici, Stephen	69.3	$76,923.00
Sachdev, Varoon	0.2	$284.00
Venes, Aileen	7.5	$3,675.00
Walz, Jacko	8.4	$7,308.00
Wick, Katie	1.4	$686.00
Yoo, Jade	1.3	$1,781.00
Zahiremami, Golshid	48.2	$47,718.00
Zatz, Andrew	1.6	$3,360.00
B21	**29.0**	**$35,490.00**
Professional Retention & Fees - Other	**29.0**	**$35,490.00**
Greissman, Scott	0.5	$1,250.00
Hirshorn, Deanna	0.6	$294.00
Lingle, Barrett	2.3	$3,151.00
Litz, Dominic	2.9	$3,973.00
Ludovici, Stephen	1.1	$1,221.00
Mago, Don	0.4	$396.00
Miranda, Loredana	4.3	$5,246.00
Venes, Aileen	0.3	$147.00
Walz, Jacko	2.5	$2,175.00
Wick, Katie	3.3	$1,617.00
Zahiremami, Golshid	6.0	$5,940.00
Zatz, Andrew	4.8	$10,080.00
B22	**5.7**	**$9,573.00**
Reports, Schedules & US Trustee Issues	**5.7**	**$9,573.00**
Chase, Ashley	1.1	$1,738.00
Greissman, Scott	0.4	$1,000.00
Koster, Charles	0.4	$760.00
Lingle, Barrett	1.0	$1,370.00
Smith, Erin	2.5	$4,075.00

Cat. No. Project Category Description Name	Hours	Fees
Zatz, Andrew	0.3	$630.00
B23	**2.4**	**$4,960.00**
Tax Issues	**2.4**	**$4,960.00**
Dreier, David	0.8	$1,880.00
Gee, Steven	1.4	$2,660.00
Zatz, Andrew	0.2	$420.00

Exhibit D

Detailed Statement of Additional Expenses[1]

Name	English Narrative	Category	Amount
Greissman, Scott	Copy of JTT #70370 - IN RE: MODIVCARE / CONFIRMATION HEARING DAY FIVE - COURT'S RULING CASE NUMBER/JUDGE: 25-90309-11 / JUDGE ALFREDO R. PEREZ	Deposition Transcripts	$17.00
Greissman, Scott	12/08/2025 - Catering during trial – JASONS DELI - ~18 meals (partial)	Business Meals	$163.50
Greissman, Scott	12/08/2025 - Catering during trial – JASONS DELI - ~18 meals (partial)	Business Meals	$123.14
Greissman, Scott	12/08/2025 - Catering during trial – JASONS DELI - ~18 meals (partial)	Business Meals	$21.62
Greissman, Scott	12/09/2025 – Catering during trial - Common Bond Brasserie & Bakery - ~15 breakfast items	Business Meals	$99.86
Greissman, Scott	12/09/2025 - Catering during trial – JASONS DELI - ~13 meals	Business Meals	$287.15
Greissman, Scott	12/09/2025 - Catering during trial – JASONS DELI - ~4 meals	Business Meals	$71.45
Greissman, Scott	12/10/2025 - Catering during trial – JASONS DELI - ~19 meals (partial)	Business Meals	$318.39
Greissman, Scott	12/10/2025 - Catering during trial – JASONS DELI - ~19 meals (partial)	Business Meals	$95.68
Greissman, Scott	12/10/2025 - Catering during trial – JASONS DELI - ~19 meals (partial)	Business Meals	$18.91
Greissman, Scott	12/11/2025 - Cardholder- NATALIA MONDRAGON - NIKO NIKOS RESTAURANTS - ModivCare□1908759-0002	Business Meals	$304.62
West, Colin	Taxi - Hotel/Airport - Taxi expense incurred while traveling to Houston for a matter. - 12-Dec-2025	Taxi - Business	$67.59
West, Colin	Taxi - Airport/Residence - Taxi expense incurred while traveling to Houston for a matter. - 12-Dec-2025	Taxi - Business	$187.45
West, Colin	Taxi - Residence/Airport - Taxi expense incurred while traveling to Houston for a matter. - 06-Dec-2025	Taxi - Business	$113.52
West, Colin	One Way, Economy airfare/fee on Delta Airlines Inc. from NYC to HOU for Colin West on 12/06/2025 for ModivCare matter	Airfare	$408.48
West, Colin	One Way, Economy airfare/fee on Delta Airlines Inc. from HOU to NYC for Colin West on 12/12/2025 for ModivCare matter	Airfare	$418.48
West, Colin	Taxi - Airport/Hotel - Taxi expense incurred while traveling to Houston for a matter. - 06-Dec-2025	Taxi - Business	$92.30
West, Colin	Hotel stay by Colin West at JW Marriott Houston Downtown in Houston, TX for 7 days, 6 nights for ModivCare Matter	Hotel Expense	$3,008.44
	TOTAL		**$5,817.58**

[1] Due to an internal administrative issue, some of the "Business Meals" entries were split into multiple line items. The English Narrative has had "(partial)" added to reflect this.

Exhibit E

Summary of Expenses

Category	Amount
Airfare	$21,141.73
Business Meals	$3,482.74
Certification of a Document by the County Clerk	$335.80
Computer Services	$106.00
Conference Room Dining	$6,194.30
Courier Service	$556.09
Court Costs	$200.00
Deposition Transcripts	$153,941.10
Document Research	$309.20
E-Discovery Data Hosting / Storage	$1,479.34
E-Discovery Data Processing	$175.00
E-Discovery Production	$130.00
E-Discovery Technical Time	$75.00
E-Discovery User Fees	$4,275.00
Express Mail	$82.21
External Document Production	$31,128.22
Filing Fees	$600.00
Hotel Expense	$47,561.34
Overtime Meals	$1,145.09
Parking	$212.50
Printing	$2,938.25
Taxi - Business	$11,332.77
Taxi - Overtime	$918.27
Train - Out of Town	$485.10
Travel Meals	$2,740.33
UCC Filing Fees	$8,923.75
Grand Total	**$300,469.13**

Exhibit F

Customary and Comparable Compensation Disclosure for White & Case LLP

The blended hourly rate for White & Case timekeepers (including both professionals and paraprofessionals) who have billed time to the Committee during the Final Period was approximately $1,414 per hour (the "Committee Blended Rate").[1]

The non-bankruptcy blended hourly rate for White & Case's timekeepers during the 12-month period from January 1, 2025, to and including December 31, 2025 (the "Comparable Period")[2] was, in the aggregate, approximately $1,272 per hour (the "Non-Bankruptcy Blended Rate").[3]

A detailed comparison of these rates is as follows:

Category of Timekeeper	Committee Blended Rate	Non-Bankruptcy Blended Rate
Partner[4]	$2,221	$1,816
Counsel	$1,630	$1,436
Associate[5]	$1,169	$1,063
Paraprofessional	$500	$462
Aggregate	**$1,414**	**$1,272**

1 White & Case calculated the blended rate for timekeepers who billed to the Debtors by dividing the total dollar amount billed by such timekeepers during the Final Period by the total number of hours billed by such timekeepers during the Final Period. Accordingly, it does not reflect the voluntary reductions made by White & Case.

2 On an annual basis, White & Case reexamines and adjusts for increases in seniority and changes in experience, expertise, and status in January of each year the rates for lawyers and paraprofessionals.

3 White & Case calculated the Non-Bankruptcy Blended Hourly Rate by dividing the total dollar amount billed by all timekeepers in the applicable offices to non-bankruptcy matters during the Comparable Period by the total number of hours billed by all timekeepers in the applicable offices to non-bankruptcy matters during the Comparable Period. For purposes of the foregoing calculation, White & Case included New York and Chicago as the applicable offices.

4 Does not include partner of counsel.

5 Includes law clerks.

Exhibit G

Pesce Certification

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

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

CERTIFICATION OF GREGORY F. PESCE IN SUPPORT OF WHITE & CASE LLP'S FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 9, 2025 THROUGH DECEMBER 29, 2025

I, Gregory F. Pesce, hereby certify as follows:

1. I am a partner of the firm of White & Case LLP ("White & Case"), an international law firm, which maintains offices for the practice of law at, among other locations, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606-4302, and 609 Main Street, Suite 2900, Houston, TX 77002.

2. This certification ("Certification") is made in connection with White & Case's final application, dated February 12, 2026 (the "Application") for compensation and reimbursement of expenses for the period from September 9, 2025 through December 29, 2025.[2]

3. I have reviewed the Application and certify that, to the best of my knowledge, information, and belief, the Application complies with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Bankruptcy Local Rules, and United States Trustee Programs'

[1] A complete list of each of the Debtors in these 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 these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not defined in this Certification shall have the meaning ascribed to them in the Application.

Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. 330 by Attorneys in Larger Chapter 11 Cases (the "UST Guidelines").

4. I certify that White & Case has complied with the provisions of the Compensation Procedures Order with respect to the Prior Fee Statements filed and served by White & Case.

5. In accord with Appendix B of the UST Guidelines, White & Case states as follows:

(a) Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

(i) **Response**: No.

(b) If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher than 10% or more, did you discuss the reasons for the variation with the client?

(i) **Response**: White & Case did not submit a budget.

(c) Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

(i) **Response**: No.

(d) Does the fee application include time or fees related to reviewing or revising time records or preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application? If so, please quantify by hours and fees.

(i) **Response**: Yes. This Application includes time and fees related to reviewing or revising time records or preparing, reviewing or revising invoices in connection with the preparation of White & Case's monthly fee statements relating to the Final Period. White & Case is seeking compensation for approximately 52.7 hours and $60,167 in fees with respect to reviewing and revising time records to prepare such fee applications.

(e) Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

(i) **Response**: Yes. Such time spent by White & Case to ensure that the time entries subject to this Application do not disclose privileged or confidential information is included in the answer to the previous question. This review and any revisions associated therewith are a necessary component of White & Case's fee applications.

(f) If the fee application includes any rate increase since retention:

(i) Did your client review and approve those rate increases in advance?

(A) **Response**: The Application does not include any rate increases since retention.

(ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not to agree to modify rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

(A) **Response**: The Application does not include any rate increases since retention.

Dated: February 12, 2026
Chicago, Illinois

/s/ Gregory F. Pesce
Gregory F. Pesce
Partner, White & Case LLP

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

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

FINAL ORDER ALLOWING COMPENSATION
AND REIMBURSEMENT OF EXPENSES FOR WHITE & CASE LLP
(Docket No. ____)

The Court has considered *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 to and Including December 29, 2025* filed by White & Case LLP (the "Applicant"). The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses in the amount of $14,193,990.13 for the period set forth in the application.

2. The compensation and reimbursement of expenses allowed in this order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.

3. The Debtors are authorized and directed to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

THE HONORABLE ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

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

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

In re:	Chapter 11
MODIVCARE, INC., *et al.,*[1]	Case No. 25-90309 (ARP)
Reorganized Debtors.	(Jointly Administered)
	Objection Deadline: March 4, 2026 @ 4:00 p.m. (CT)

SUMMARY COVER SHEET TO THE FINAL FEE APPLICATION OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	**Financial Advisor to the Official Committee of Unsecured Creditors**	
Docket No. of Employment Order(s):	**November 4, 2025, effective as of September 10, 2025 [Docket No. 654]**	
Interim Application ( ) No. _____ Final Application (X)		
	Beginning Date	**End Date**
Time period covered by this Application for which interim compensation has not previously been awarded:	09/10/2025	12/29/2025
Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? **Yes**		

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? **Yes**	
Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? **Yes**	
Do expense reimbursements represent actual and necessary expenses incurred? **Yes**	
Compensation Breakdown for Time Period Covered by this Application	
Total professional fees requested in this Application:	$4,955,847.00
Total professional hours covered by this Application:	4,671.3
Average hourly rate for professionals:	$1,060.91
Total paraprofessional fees requested in this Application:	$0.00
Total paraprofessional hours covered by this Application:	N/A
Average hourly rate for paraprofessionals:	N/A
Total fees requested in this Application:	$4,980,847.00[2]
Total expense reimbursements requested in this Application:	$41,910.29
Total fees and expenses requested in this Application:	**$5,022,757.29**
Total fees and expenses awarded in all prior Applications:	**$0.00**
Plan Status: On December 15, 2025, after a hearing before the United States Bankruptcy Court for the Southern District of Texas (the "Court"), the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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], approving, among other things, the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (the "Plan"). The effective date of the Plan occurred on December 29, 2025.	

[2] The Application does not include actual fees incurred after December 29, 2025 in connection with the preparation and prosecution of this Application. Accordingly, AlixPartners requests allowance of up to $25,000.00 for fees incurred or expected to be incurred after the Effective Date (as defined herein) in connection therewith (the "Post-Effective Date Fees"). For the avoidance of doubt, AlixPartners shall invoice the lesser of (i) its actual, reasonable, and necessary Post-Effective Date Fees or (ii) $25,000.00.

Primary Benefits:
During the case, AlixPartners advised and assisted the Committee and its counsel at White & Case ("W&C") with several workstreams that provided numerous benefits, including:

- performing due diligence on the Debtors' financial projections and valuation
- drafting of expert business plan and valuation reports and providing expert testimony at the confirmation trial
    - business plan expert report identified numerous opportunities to enhance the Debtors' projected EBITDA
- supporting an objection to the Debtors' DIP financing motion with analysis and testimony, resulting in material changes to the DIP financing order in favor of unsecured creditors
- providing insight and analysis into the Debtors' initial Plan and Disclosure Statement and assisting W&C with a Disclosure Statement objection, which resulted in the Debtors amending the Plan to increase recoveries to general unsecured creditors
- performing analysis on the Company's liquidity, including various sensitivity scenarios
- undertaking diligence and financial analysis related to various motions and objections, including challenges on liens, section 552 and historical transactions
- evaluating unsecured creditor recovery estimates under various scenarios
- investigating potential causes of action against various parties
- reviewing and providing analysis of filed and schedule claims as well as the Debtors' schedules and statements
- performing various ad hoc financial analysis supporting W&C, including analysis on the "first day" motions and United Healthcare settlement
- analyzing and evaluating the reasonableness of the engagement terms and conditions proposed by Debtors' retained professionals
- assisting W&C with numerous motions filed with the court including:
    - investigating the prepetition liability management exercise and related causes of action
    - investigating secured lenders' liens on certain of the Debtors' assets earned pre- and post-petition
- assisting W&C with extensive discovery related to the DIP, Plan and various motions and complaints, including document review, numerous depositions and Company interviews, and preparing for and participating in various meetings with parties in the case
- working with W&C to prepare for the confirmation hearing including witness preparation and providing insight and financial analysis used during trial
- communication with the Committee members and their legal advisors to ensure all constituents were well informed and advised in order to make necessary decisions for the benefit of all unsecured creditors

ALIXPARTNERS, LLP

SUMMARY OF MONTHLY FEE STATEMENTS
DURING THE FINAL PERIOD

Date Filed; Docket No.	Period	Requested		Paid		Amount Outstanding
		Fees	Expenses	Fees	Expenses	
11/05/2025 Docket #666	09/10/2025 - 09/30/2025	$ 983,352.00	$ 2,567.78	$ 786,681.60	$ 2,567.78	$ 196,670.40
12/03/2025 Docket #897	10/01/2025 - 10/31/2025	2,066,591.00	17,382.17	1,653,272.80	17,382.17	413,318.20
12/18/2025 Docket #1086	11/01/2025 - 11/30/2025	1,303,465.75	5,121.11	1,042,772.60	5,121.11	260,693.15
1/15/2026 Docket #1178	12/1/2025 - 12/29/2025	602,438.25	16,839.23	481,950.60	16,839.23	120,487.65
Subtotal		**$ 4,955,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 991,169.40**
Post-Effective Date Fees		25,000.00				25,000.00
Total		**$ 4,980,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 1,016,169.40**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DURING THE FINAL PERIOD

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	281.5	$ 410,990.00
Kevin Nystrom	Partner & Managing Director	$1,430	0.2	286.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	117.3	165,979.50
Marc Brown	Partner & Managing Director	$1,415	150.8	213,382.00
Greg Magrisi	Partner & Managing Director	$1,250	178.4	223,000.00
Christopher Rubel	Partner	$1,225	222.0	271,950.00
Jerry Wang	Partner	$1,225	18.4	22,540.00
Johnny Lee	Partner	$1,225	123.9	151,777.50
Elizabeth S Kardos	Partner	$950	12.0	11,400.00
Ashutosh Panda	Director	$1,150	463.6	533,140.00
Joel Amico	Director	$1,150	440.0	506,000.00
Iain Nelson	Director	$1,120	42.0	47,040.00
Matthew D Gates	Director	$1,120	192.1	215,152.00
Ryan Komendowski	Director	$1,080	416.1	449,388.00
Matthew Root	Director	$1,000	254.3	254,300.00
Matthew Wicker	Director	$1,000	1.5	1,500.00
Kaitlyn Sundt McClarren	Director	$715	8.1	5,791.50
Sam Lemack	Senior Vice President	$980	37.3	36,554.00
John Tutty	Senior Vice President	$950	143.5	136,325.00

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DURING THE FINAL PERIOD

Professional	Title	Rate	Hours	Fees
Thomas G Prince	Senior Vice President	$950	241.9	229,805.00
Christopher Cuomo	Senior Vice President	$910	150.3	136,773.00
Jyoji Morimoto	Senior Vice President	$910	89.5	81,445.00
Susan Clark	Senior Vice President	$910	318.4	289,744.00
Chase Hood	Senior Vice President	$850	408.1	346,885.00
Sari Hammer	Senior Vice President	$660	0.8	528.00
Brooke Filler	Senior Vice President	$605	5.6	3,388.00
Laurie Capen Verry	Senior Vice President	$600	0.5	300.00
Jennifer Braverman	Senior Vice President	$565	35.5	20,057.50
Claire Allshouse	Vice President	$810	14.6	11,826.00
Lucas Lovatto	Vice President	$835	221.7	185,119.50
Lisa Marie Bonito	Vice President	$580	62.3	36,134.00
Francisco Carafi	Vice President	$445	15.5	6,897.50
Hugh Olohan	Analyst	$535	3.6	1,926.00
Total Hours and Fees for Professionals			**4,671.3**	**$ 5,007,324.00**
Less: 50% Travel Fees				(51,477.00)
Total Fees for Professionals				**$ 4,955,847.00**

Average Billing Rate **$ 1,060.91**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
DURING THE FINAL PERIOD

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	101.3	$ 116,057.50
1.2	Meetings & Communication with UCC and Creditors	256.6	306,728.50
1.3	Prepare Committee Presentations	118.8	131,055.00
1.4	Meetings & Communication with Debtors	105.8	120,354.00
1.5	Mediation and Settlement Communications	42.6	47,590.50
1.6	DIP Financing and Cash Collateral	215.0	228,903.50
1.7	Liquidity and Cash Management	103.0	100,676.00
1.9	Business and Strategic Plan	1,304.9	1,335,818.50
1.10	Employee Compensation and Advisor Retention Matters	21.9	22,210.00
1.11	Financial and Other Diligence	406.9	430,674.00
1.12	Other Motions and Related Objections	59.8	67,875.00
1.13	Litigation Support & Investigations	398.4	469,325.50
1.14	Claims Analysis	152.4	147,204.50
1.15	Valuation and Solvency Analysis	829.4	902,168.50
1.17	RSA, Disclosure Statement & Plan of Reorganization	85.5	89,377.50
1.18	Court Hearings and Status Conferences	201.9	240,499.50
1.19	Retention Application & Relationship Disclosures	56.2	37,347.00
1.20	Fee Applications & Fee Statements	83.0	60,713.00
1.21	Discovery	2.3	2,626.00
1.22	Intercompany & Waterfall Analysis	44.1	47,166.00
1.31	Travel Time	81.5	51,477.00
	Total Hours and Fees By Matter Category	**4,671.3**	**$ 4,955,847.00**

Average Billing Rate $ 1,060.91

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
DURING THE FINAL PERIOD

Expense Category	Amount
Airfare	$ 6,470.03
Client Research	11,973.63
Ground Transportation	5,056.71
Lodging	16,229.90
Meals	2,180.02
Total Expenses	**$ 41,910.29**

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

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

FINAL FEE APPLICATION OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH DECEMBER 29, 2025

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors and reorganized debtors (collectively, the "Debtors" or the "Reorganized Debtors"), hereby submits its final application (the "Application") for allowance of compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from September 10, 2025 through December 29, 2025 (the "Final Period").

Jurisdiction and Venue

1. The United States Bankruptcy Court for the Southern District of Texas, in the Houston Division (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Basis for Relief

3. The bases for relief requested herein are Sections 327, 330 and 331 of Title 11 of the United States Bankruptcy Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Local Rules"), the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, adopted June 11, 2013 (the "U.S. Trustee Guidelines") and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 500] ("Interim Compensation Order").

Background

4. On August 20, 2025 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned Chapter 11 Cases (the "Chapter 11 Cases") in this Court.

5. No trustee or examiner has been appointed in these Chapter 11 Cases

6. On September 5, 2025, the Office of the United States Trustee for the District of Texas, Houston Division (the "U.S. Trustee") appointed the Official Committee of Unsecured Creditors (the "Committee") [Docket No. 124].

7. On December 5, 2025, the Debtors filed their *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 959] (the "Plan").

8. On December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of 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"), pursuant to which the Court approved and confirmed the Plan.

9. On December 29, 2025, the Debtors filed the *Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims* [Docket No. 1134] (the "Effective Date Notice"). The Plan went effective on December 29, 2025, (the "Effective Date").

10. Pursuant to the Plan, Confirmation Order, and Effective Date Notice, all professionals requesting compensation for services rendered and reimbursement of expenses in the Chapter 11 Cases prior to the Effective Date must file and serve a final fee application.

AlixPartners' Retention

11. On October 8, 2025, the Committee filed its *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* [Docket No. 473] (the "Retention Application").

12. On November 4, 2025, the Court entered the *Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025* [Docket No. 654] (the "Retention Order").

13. The Retention Order approved the terms of AlixPartners' hourly fee and expense structure set forth in the engagement letter dated September 11, 2025 (the "Engagement Letter") and authorized AlixPartners to be compensated and reimbursed pursuant to section 330 of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, Bankruptcy Rules, Local Rules, U.S. Trustee Guidelines and the Interim Compensation Order, and any other applicable orders of this Court.

14. Pursuant to the Engagement Letter, David MacGreevey is the Partner & Managing Director responsible for this engagement, assisted by a staff of consultants at various levels with a wide range of relevant skills and abilities.

Monthly Fee Statements During the Final Period

15. AlixPartners served four (4) monthly fee statements (the "Monthly Fee Statements") during the Final Period. The Monthly Fee Statements contain detailed descriptions

of the services rendered in the amount of $4,955,847.00[2] and out-of-pocket expenses incurred in the amount of $41,910.29 and are attached hereto:

> **Exhibit A** is the *First Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through September 30, 2025* [Docket No. 666]
>
> **Exhibit B** is the *Second Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from October 1, 2025 through October 31, 2025* [Docket No. 897]
>
> **Exhibit C** is the *Third Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from November 1, 2025 through November 30, 2025* [Docket No. 1086]
>
> **Exhibit D** is the *Fourth Monthly Fee Statement of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from December 10, 2025 through December 29, 2025* [Docket No. 1178]

16. Detailed descriptions of the services rendered by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour), and a detailed list of out-of-pocket expenses incurred during the Final Period were included in the Monthly Fee Statements, which have been served and noted below:

[2] This amount includes the 20% holdback of fees reflected in the Monthly Fee Statements, including $196,670.40 for the First Monthly Fee Statement, $413,318.20 for the Second Monthly Fee Statement, $260,693.15 for the Third Monthly Fee Statement, and $120,487.65 for the Fourth Monthly Fee Statement, for a total holdback of $991,169.40 (the "Holdback").

Date Filed; Docket No.	Period	Requested		Paid		Amount Outstanding
		Fees	Expenses	Fees	Expenses	
11/05/2025 Docket #666	09/10/2025 - 09/30/2025	$ 983,352.00	$ 2,567.78	$ 786,681.60	$ 2,567.78	$ 196,670.40
12/03/2025 Docket #897	10/01/2025 - 10/31/2025	2,066,591.00	17,382.17	1,653,272.80	17,382.17	413,318.20
12/18/2025 Docket #1086	11/01/2025 - 11/30/2025	1,303,465.75	5,121.11	1,042,772.60	5,121.11	260,693.15
1/15/2026 Docket #1178	12/1/2025 - 12/29/2025	602,438.25	16,839.23	481,950.60	16,839.23	120,487.65
Subtotal		**$ 4,955,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 991,169.40**
Post-Effective Date Fees		25,000.00				25,000.00
Total		**$ 4,980,847.00**	**$ 41,910.29**	**$ 3,964,677.60**	**$ 41,910.29**	**$ 1,016,169.40**

17. This final Application does not include additional fees incurred after December 29, 2025 with regards to the preparation and prosecution of this final Application. AlixPartners hereby requests an additional $25,000.00 for fees incurred and expected to be incurred after the Effective Date in connection with the preparation and prosecution of this final Application (the "Post-Effective Date Fees"). For the avoidance of doubt, AlixPartners will invoice the lesser of either actual, reasonable and necessary fees or $25,000.00 for the Post-Effective Date Fees.

18. AlixPartners received payments from the Debtors in the amount of $3,964,677.60 for services rendered and $41,910.29 for out-of-pocket expenses incurred during the Final Period. The total amount of $1,016,169.40 remains outstanding as of the filing of this Application.

Summary of Services Rendered During the Final Period

19. During the Final Period, AlixPartners advised the Committee and supported White & Case in analyzing numerous issues critical to unsecured creditors' interests. Due to the Committee's efforts with assistance from AlixPartners, the unsecured creditors were able to obtain a more favorable recovery than the Debtors initial filed Plan. After numerous meetings and diligence sessions with the Debtors' advisors and various Committee filings with the Court, the Debtors ultimately filed an amended Plan that increased recoveries for general unsecured creditors by allowing them to share in the reorganized equity and participate in the warrants package or select a cash out option.

20. AlixPartners also developed an independent view of the Debtors' business plan and valuation. This included numerous due diligence sessions with management and Debtor advisors, review of various Debtor produced business plan documents, development of supporting analyses and review of data room documents. Ultimately AlixPartners produced expert reports related to its analysis of the Debtors' business plan and valuation and provided related testimony at the confirmation hearing. The expert business plan report provided an objective third party view of the Debtors' proposed business plan and identified key initiatives that would result in EBITDA enhancements. During the DIP hearing, AlixPartners presented analysis and testimony that ultimately served as the basis for changes in the DIP financing order beneficial to unsecured creditors. In sum, AlixPartners played a critical role to represent unsecured creditors interests, increased recoveries under the Plan and provided a check on the Debtors' actions throughout the case.

Summary of Services by Category During the Final Period

21. AlixPartners classified the services performed into separate categories. The descriptions below summarize the services provided by AlixPartners to the Committee during the Final Period.

Matter Code 1.1: Planning, Coordination and Case Management
101.3 hours – $116,057.50

- Organized and managed resources to effectively plan and coordinate the Chapter 11 process
- Held working sessions to keep the engagement team informed of case developments, remain aligned on the many workstreams, verify that resources were properly allocated to meet deadlines, and ensure all matters and issues are being addressed in an efficient and timely manner

Matter Code 1.2: Meetings & Communication with UCC and Creditors
256.6 hours – $306,727.50

- Updated the Committee regarding the status of the Chapter 11 Cases and presented analyses for various case workstreams

- Attended discussions and communicated with other professionals representing the Committee
- Calls and communication with W&C and/or Committee members

Matter Code 1.3: Preparation of Committee Presentations
118.8 hours - $131,055.00

- Prepared, revised and circulated presentations to the Committee containing case updates and various case workstream analyses

Matter Code 1.4: Meetings & Communication with Debtors
105.8 hours - $120,354.00

- Meetings, interviews and communication with Company management, Latham & Watkins, FTI Consulting and Moelis & Company

Matter Code 1.5: Mediation and Settlement Communications
42.6 hours - $47,590.50

- Attended meetings, communicated and coordinated with various parties related to settlement discussions
- Performed analysis related to settlement discussions

Matter Code 1.6: DIP Financing and Cash Collateral
215.0 hours - $228,903.50

- Analyzed and reviewed the DIP Credit Agreement and other related documents
- Reviewed the Debtors' DIP Budget
- Assisted W&C in evaluating the DIP motion
- Analyzed the key terms and conditions of the Debtors' proposed DIP financing as compared to DIP financing proposed by similarly situated companies
- Prepared a declaration and supporting exhibits in support of the Committee's objection to the proposed DIP financing

Matter Code 1.7: Liquidity and Cash Management
103.0 hours - $100,676.00

- Analyzed cash flow budgets published during these Chapter 11 Cases
- Developed projections of cash available as of the Effective Date
- Performed various analyses to project liquidity under various scenarios

Matter Code 1.9: Business and Strategic Plan Analysis
1,304.9 hours - $1,335,818.50

- Analyzed and performed due diligence regarding the Debtors' business plan and its reasonableness with respect to emergence from the Chapter 11 Cases
- Detailed review of various business plan models, supporting schedules and assumptions
- Preparation of expert report to assess the reasonability of the Debtors' business plan, which identified numerous opportunities for the Debtors to improve

efficiency in their business and generate incremental revenue

Matter Code 1.10: Employee Compensation and Advisor Retention Matters
21.9 hours - $22,210.00

- Reviewed and analyzed engagement letters and professional fee forecasts for each professional retained by the Debtors, Lenders and Committee
- Reviewed and analyzed retention applications of the Debtors' financial advisor and investment banker as compared to motions in similar cases
- Analyzed key terms and conditions of the Debtors' financial advisor and investment banker as compared to financial advisor and investment banker retentions by similarly situated companies to advise the Committee as to the reasonableness of the proposed retentions

Matter Code 1.11: Financial and Other Diligence
406.9 hours - $430,674.00

- Performed various financial analyses including work related to projected liquidity, financial projections, data room diligence, and other tasks not included in other matter codes
- Prepared detailed analysis and summary of Debtors' schedules of assets and liabilities and statements of financial affairs ("Schedules and Statements")
- Performed financial analysis to support various requests from W&C
- Researched and documented relevant information regarding the Debtors' and other relevant parties' financial affairs from public and non-public sources, including, but not limited to, SEC filings, monthly operating reports, Schedules and Statements and data provided by the Debtors' advisors

Matter Code 1.12: Other Motions and Related Objections
59.8 hours - $67,875.00

- Reviewed the Court docket and case calendars
- Analyzed and reviewed pleadings filed on the Court docket
- Analysis of "first day" and other motions and related objections not encompassed by other matter codes, such as the UHC settlement motion and certain ordinary course professional motions

Matter Code 1.13: Litigation Support & Investigations
398.4 hours - $469,325.50

- Conducted detailed investigations into the Debtors' insiders' and other parties' actions prior to filing for bankruptcy
- Reviewed the Debtors' advisors' reports on these actions, prepared related expert reports, and summarized findings for the Committee
- Assisted W&C with diligence and financial analysis related to various motions and objections including challenges on liens, section 552 and historical transactions
- Prepared for numerous interviews and depositions

Matter Code 1.14: Claim Analysis
152.4 hours - $147,204.50

- Reviewed and analyzed scheduled and filed claims
- Derived illustrative waterfalls to assess potential general unsecured claimant recoveries

Matter Code 1.15: Valuation and Solvency Analysis
829.4 hours - $902,168.50

- Assessed likely ranges of value of the Debtors' assets or business units under reorganization, sale and/or liquidation scenarios, both historically and currently
- Analysis of the Debtors' valuation report
- Review of the Debtors' historical and projected financials, analysis of comparable companies and analysis of comparable transactions
- Preparation of an expert valuation report
- Analysis of valuation and solvency under different scenarios and assumptions

Matter Code 1.17: RSA, Disclosure Statement & Plan
85.5 hours - $89,377.50

- Negotiated, analyzed, reviewed and provided commentary on the Debtors' Plan, Disclosure Statement, Plan supplement, and other related documents

Matter Code 1.18: Court Hearings and Status Conferences
201.9 hours - $240,499.50

- Attended court hearings and status conferences
- Provided testimony at court hearings

Matter Code 1.19: Retention Application & Relationship Disclosures
56.2 hours - $37,347.00

- Drafted AlixPartners' retention application, proposed orders and declarations
- Analyzed relationship disclosures required by the Bankruptcy Code
- Communicated with various parties regarding AlixPartners' retention
- Responded to inquiries related to AlixPartners' retention

Matter Code 1.20: Fee Statements & Fee Applications
83.0 hours - $60,713.00

- Managed the fee application process
- Prepared and reviewed the Monthly Fee Statements, including all required supporting documentation in accordance with requirements of the U.S. Trustee and/or the Court

Matter Code 1.21: Discovery
2.3 hours - $2,626.00

- Collected, processed, and organized data
- Reviewed collected data and documents

Matter Code 1.22: Intercompany & Waterfall Analysis
44.1 hours - $47,166.00

- Analyzed and reviewed prepetition and post-petition intercompany transactions
- Prepared waterfall analysis to evaluate creditor recoveries under various scenarios

Matter Code 1.31: Travel Time
81.5 hours - $51,477.00 (billed at 50% standard rates)

- Traveled to meetings and Court hearings outside of consultants' respective "home" office region

22. AlixPartners has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

AlixPartners' Requested Compensation and Reimbursement of Expenses Should be Allowed

23. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under Section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

> In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, extent, and the value of such services, taking into account all relevant factors, including-
>
> (A) the time spent on such services;
> (B) the rates charged for such services;
> (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
> (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue or task addressed; and

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than under this title.

11 U.S.C. § 330(a)(3).

24. AlixPartners believes that the fees and out-of-pocket expenses requested are reasonable, actual and for necessary services rendered or expenses incurred on behalf of the Committee during the Final Period.

Notice

25. Notice of the Application has been or will be provided to those parties entitled to receive notice hereof in accordance with any applicable order of this Court.

[Remainder of page intentionally left blank.]

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests that the Court enter an order providing: (i) a final allowance in the amount of $4,955,847.00 (including the Holdback in the amount of $991,169.40) as compensation for professional services rendered and $41,910.29 for reimbursement of out-of-pocket expenses for the Final Period and Post-Effective Date Fees in the amount of $25,000.00, for a total amount of $5,022,757.29; (ii) that the Debtors are authorized and directed to pay AlixPartners the remaining outstanding balance of $1,016,169.40; and (iii) such other and further relief as this Court deems proper.

Dated: February 11, 2026

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

First Monthly Fee Statement
September 10, 2025 through September 30, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: November 19, 2025 @ 4:00 p.m.(CT)

FIRST MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	9/10/2025	9/30/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$786,681.60 (80% of $983,352.00)	
Total expenses requested in this Fee Statement:	$2,567.78	
Total fees and expenses requested in this Fee Statement:	$789,249.38	
Blended hourly rate for professionals:	$1,042..02	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

2590309251105000002408 0016

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	95.1	$ 138,846.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	36.9	52,213.50
Marc Brown	Partner & Managing Director	$1,415	3.3	4,669.50
Greg Magrisi	Partner & Managing Director	$1,250	8.4	10,500.00
Jerry Wang	Partner	$1,225	4.2	5,145.00
Johnny Lee	Partner	$1,225	15.2	18,620.00
Ashutosh Panda	Director	$1,150	55.5	63,825.00
Joel Amico	Director	$1,150	93.3	107,295.00
Matthew D Gates	Director	$1,120	88.8	99,456.00
Ryan Komendowski	Director	$1,080	46.2	49,896.00
Matthew Root	Director	$1,000	35.7	35,700.00
Kaitlyn Sundt McClarren	Director	$715	2.2	1,573.00
Thomas G Prince	Senior Vice President	$950	123.2	117,040.00
Christopher Cuomo	Senior Vice President	$910	75.0	68,250.00
Jyoji Morimoto	Senior Vice President	$910	44.2	40,222.00
Susan Clark	Senior Vice President	$910	21.6	19,656.00
Chase Hood	Senior Vice President	$850	150.5	127,925.00
Sari Hammer	Senior Vice President	$660	0.8	528.00
Brooke Filler	Senior Vice President	$605	3.2	1,936.00
Jennifer Braverman	Senior Vice President	$565	26.0	14,690.00
Lucas Lovatto	Vice President	$835	13.8	11,523.00
Lisa Marie Bonito	Vice President	$580	0.6	348.00
Total Hours and Fees for Professionals			**943.7**	**$ 989,857.00**
Less: 50% Travel Fees				(6,505.00)
Total Fees for Professionals				**$ 983,352.00**
Less: 20% Holdback				(196,670.40)
Total Fees for Professionals Less Holdback				**$ 786,681.60**

Average Billing Rate	**$ 1,042.02**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	31.1	$ 35,620.00
1.2	Meetings & Communication with UCC and Creditors	72.7	87,895.50
1.3	Preparation of Committee Presentations	39.4	42,117.00
1.4	Meetings & Communication with Debtors	23.8	28,758.00
1.6	DIP Financing and Cash Collateral	213.7	227,403.00
1.7	Liquidity and Cash Management	52.0	51,159.00
1.9	Business and Strategic Plan	115.6	120,670.50
1.10	Employee Compensation and Advisor Retention Matters	16.1	15,584.00
1.11	Financial and Other Diligence	140.0	144,921.00
1.12	Other Motions and Related Objections	30.0	32,302.00
1.14	Claims Analysis	0.9	765.00
1.15	Valuation and Solvency Analysis	118.6	118,838.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	12.5	13,175.50
1.18	Court Hearings and Status Conferences	30.4	34,241.50
1.19	Retention Application & Relationship Disclosures	33.6	20,771.00
1.21	Discovery	2.3	2,626.00
1.31	Travel Time	11.0	6,505.00
	Total Hours and Fees By Matter Category Before Holdback	**943.7**	**$ 983,352.00**

Average Billing Rate $ 1,042.02

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
SEPTEMBER 10, 2025 THROUGH SEPTEMBER 30, 2025

Expense Category	Amount
Airfare	$ 340.49
Ground Transportation	529.53
Lodging	1,432.37
Meals	265.39
Total Expenses	**$ 2,567.78**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this first monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from September 10, 2025 through September 30, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $983,352.00 and reimbursement of out-of-pocket expenses in the amount of $2,567.78 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $786,681.60 (80% of $983,352.00) and 100% of out-of-pocket expenses in the amount of $2,567.78 for a total amount of $789,249.38; and (iii) such other and further relief as this Court deems proper.

Dated: November 5, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Correspondence with team re: work plan	0.4
09/10/2025	CH	Prepare working group list for counsel	0.8
09/10/2025	CH	Prepare team internal datasite and email distribution group	0.9
09/10/2025	DM	Communicate with D. Orlofsky (AlixPartners) re: ModivCare UCC work plan and staffing	0.5
09/10/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2
09/10/2025	DM	Develop ModivCare UCC work plan, strategy and related staffing	1.5
09/10/2025	DM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	GM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	KBM	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	KBM	Prepare case set-up items	0.9
09/10/2025	KBM	Email to internal team re: case workstreams and next steps	0.6
09/10/2025	MB	Internal discussion with D. MacGreevey, M. Brown, G. Magrisi, K. McGlynn (AlixPartners) re: ModivCare UCC resource coordination and work planning	0.5
09/10/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare valuation work stream and staffing	0.2
09/11/2025	AP	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	CH	Prepare internal datasite and email distribution group	0.8
09/11/2025	CH	Draft updates to working group list	0.7
09/11/2025	CC	Complete input to work plan and diligence request lists	1.4
09/11/2025	CC	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	DM	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	DM	Discussion with D. MacGreevey, M. Brown (AlixPartners) re: ModivCare investigation work plan	0.2
09/11/2025	DM	Review and comments to draft ModivCare working group list	0.5
09/11/2025	GM	Prepare for call for ModivCare re: diligence	0.3
09/11/2025	GM	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	JL	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4
09/11/2025	JL	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	KBM	Discussion with D. MacGreevey, K. McGlynn, J. Lee and A. Panda (AlixPartners) re: ModivCare business plan workstream	0.5
09/11/2025	MB	Discussion with D. MacGreevey, M. Brown (AlixPartners) re: ModivCare investigation work plan	0.2
09/11/2025	MDG	Call with G. Magrisi, M. Gates, J. Lee, and C. Cuomo (AlixPartners) re: case updates and diligence list	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/12/2025	LMB	Prepare Fee Application Procedures Memorandum	0.6
09/17/2025	JL	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/18/2025	CH	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	CC	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	DM	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	DM	Communication with K. McGlynn, J. Amico, J. Lee re: ModivCare work plan	0.4
09/18/2025	JA	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	JL	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	MDG	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	RK	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/18/2025	TGP	Call with D. MacGreevey, J. Lee, J. Amico, M. Gates, R. Komendowski, C. Hood, T. Prince, and C. Cuomo (AlixPartners) re: case updates and work plan	0.8
09/21/2025	DM	Communicate with D. Orlofsky (AlixPartners) re: ModivCare staffing	0.5
09/24/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	LL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	SC	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
09/24/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, L. Lovatto, C. Hood, C. Cuomo, S. Clark, T. Prince (AlixPartners) re: weekly case updates and ongoing workstreams	0.6
Total Professional Hours			**31.1**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.2	$	9,052.00
Kathryn B McGlynn	$1,415	3.1		4,386.50
Marc Brown	$1,415	0.7		990.50
Greg Magrisi	$1,250	1.2		1,500.00
Johnny Lee	$1,225	2.6		3,185.00
Ashutosh Panda	$1,150	1.1		1,265.00
Joel Amico	$1,150	1.4		1,610.00
Matthew D Gates	$1,120	1.8		2,016.00
Ryan Komendowski	$1,080	1.6		1,728.00
Thomas G Prince	$950	1.4		1,330.00
Christopher Cuomo	$910	3.2		2,912.00
Susan Clark	$910	0.6		546.00
Chase Hood	$850	5.0		4,250.00
Lucas Lovatto	$835	0.6		501.00
Lisa Marie Bonito	$580	0.6		348.00
Total Professional Hours and Fees		**31.1**	**$**	**35,620.00**

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Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	DM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	GM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	JA	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	KBM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/10/2025	RK	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, R. Komendowski, J. Amico (AlixPartners) re: ModivCare UCC advisors kickoff call regarding Modvicare case	0.5
09/11/2025	AP	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	DM	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	JA	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	KBM	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	MB	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/11/2025	MDG	Participate in call with D. MacGreevey, K. McGlynn, M. Gates, J. Amico, M. Brown (AlixPartners), C. Shore, S. Greissman, D. Litz, C. Koster, E. Smith (W&C) and Committee members re: case updates and next steps	0.6
09/12/2025	DM	Emails with attachment with S. Greissman, A. Zatz, E. Smith (W&C) re: additions and clarifications to ModivCare diligence tracker	0.4
09/12/2025	DM	Prepare memorandum with attachments to W&C re: updates on ModivCare work plan	0.7
09/12/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare UCC diligence and strategy	0.2
09/13/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare diligence	0.2
09/13/2025	DM	Emails with S. Greissman, A. Zatz and E. Smith (W&C) re: additions and clarifications to ModivCare diligence tracker	0.4
09/16/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8

AlixPartners

ModivCare Inc., et al.
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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	DM	Communication with A. Zatz (W&C) re: ModivCare trade vendor order	0.2
09/16/2025	DM	Discussion with S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor motion	0.4
09/16/2025	GM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JW	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JA	Discussion with S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor motion	0.4
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	JL	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8

AlixPartners

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	JL	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/16/2025	MDG	Call with A. Zatz (W&C) re: cash management motion	0.2
09/16/2025	MDG	Call with A. Zatz (W&C) re: vendor motion	0.2
09/16/2025	MDG	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	RK	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	RK	Review documents produced for valuation analysis.	1.6
09/16/2025	TGP	Participate in a call with D. MacGreevey, K. McGlynn, G. Magrisi, J. Amico, M. Gates, C. Hood, J. Wang, R. Komendowski, J. Lee, A. Panda, T. Prince, and C. Cuomo (AlixPartners) and C. Shore, S. Greissman, A. Zatz, E. Smith (W&C) re: DIP objection, critical vendor, and general case updates	0.8
09/16/2025	TGP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, J. Lee, T. Prince, and C. Cuomo (AlixPartners) and R. Beil and others (W&C) re: case status and workstreams	0.3
09/17/2025	DM	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	DM	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	DM	Emails with S. Greissman (W&C) and J. Amico (AlixPartners) re: ModivCare diligence	0.2
09/17/2025	JA	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	JA	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	JL	Discussion with D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: prepare for call with FTI re: government contracts, revenue and receivables	0.3
09/17/2025	KBM	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9

AlixPartners

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	MDG	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/17/2025	TGP	Call with A. Zatz, D. Litz, R. Beil (W&C), D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, T. Prince (AlixPartners) re: ModivCare unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9
09/18/2025	DM	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	DM	Prepare oral presentation for ModivCare UCC meeting	0.7
09/18/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JA	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	JL	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	KBM	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1

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Re: Meetings & Communication with UCC and Creditors
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	MDG	Participate in call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico and M. Gates (AlixPartners) and C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for Committee meeting	0.5
09/18/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/18/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, G. Magrisi, R. Komendowski, T. Prince (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, upcoming deadlines, ongoing workstreams, and next steps	1.1
09/19/2025	CH	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	DM	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	MDG	Call with D. MacGreevey, M. Gates, C. Hood (AlixPartners), A. Katz and others (W&C) re: DIP comps analysis and DIP forecast	0.6
09/19/2025	MDG	Email to E. Smith (W&C) re: due diligence	0.2
09/20/2025	CH	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	CC	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	DM	Participate in a call with D. MacGreevey, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and others (W&C) re: DIP objection and comparables, and case liquidity	0.8
09/20/2025	DM	Prepare for meeting with W&C re: ModivCare DIP declaration	0.7
09/21/2025	CH	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	CC	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	DM	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/21/2025	JA	Participate in a call with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shore and A. Zatz (W&C) re: cash flow and case extension analysis	0.3
09/22/2025	CH	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare valuation	0.2
09/22/2025	DM	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	DM	Prepare remarks for upcoming meeting with ModivCare UCC re: DIP objection	0.5
09/22/2025	JA	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7
09/22/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/22/2025	TGP	Attend meeting with A. Chase, E. Smith, L. Miranda (W&C), D. MacGreevey, C. Hood, T. Prince, C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.3
09/22/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, T. Prince (AlixPartners), J. Zakia, A. Zatz, B. Lingle (W&C) re: analysis of DIP financing and declaration	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners), A. A. Zatz, S. Greissman, E. Smith (W&C), and Committee members re: case updates and DIP objection	0.8
09/23/2025	CC	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/23/2025	DM	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/23/2025	JA	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) and . Zakia, A. Zatz, B. Lingle (W&C) re: review of DIP budget and extension of case timeline	0.4
09/24/2025	KBM	Review case updates from Committee Counsel and next steps	0.6
09/25/2025	AP	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	CC	Participate in a call with J. Amico and C. Cuomo (AlixPartners) and A. Chase and others (W&C) re: document collection	0.3
09/25/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	GM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	JA	Participate in a call with J. Amico and C. Cuomo (AlixPartners) and A. Chase and others (W&C) re: document collection	0.3
09/25/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico (AlixPartners) and A. Zatz, S. Greissman and others (W&C) re: prepare for upcoming Committee call	0.5
09/25/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/25/2025	MDG	Call with R. Beil (W&C) re: intercompany transfers	0.2

AlixPartners

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	RK	Attend meeting with ModivCare UCC members and individual counsel, A. Zatz, C. Shore, S. Greissman (W&C), D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, R. Komendowski, A. Panda (AlixPartners) re: weekly updates and strategies	0.8
09/29/2025	DM	Communication with J. Zakia (W&C) re: ModivCare transportation network	0.3
09/29/2025	MDG	Call with A. Zatz (W&C) re: financial projections	0.2
09/29/2025	MDG	Prepare summary of critical vendor motion and send to W&C	1.0
09/30/2025	CH	Correspondence with J. Zakia and others (W&C) re: 2nd day hearing preparation	0.7
09/30/2025	DM	Attend meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, and L. Miranda (W&C) re: DIP hearing post mortem and go forward plan	2.0
09/30/2025	JA	Participate in call with J. Amico and M. Gates (AlixPartners) and E. Smith (W&C) re: disclosure statement objection	0.3
09/30/2025	MDG	Participate in call with J. Amico and M. Gates (AlixPartners) and E. Smith (W&C) re: disclosure statement objection	0.3
Total Professional Hours			**72.7**

AlixPartners

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	17.3	$	25,258.00
Kathryn B McGlynn	$1,415	8.1		11,461.50
Marc Brown	$1,415	0.6		849.00
Greg Magrisi	$1,250	3.2		4,000.00
Jerry Wang	$1,225	0.8		980.00
Johnny Lee	$1,225	3.8		4,655.00
Ashutosh Panda	$1,150	2.1		2,415.00
Joel Amico	$1,150	9.8		11,270.00
Matthew D Gates	$1,120	8.3		9,296.00
Ryan Komendowski	$1,080	4.8		5,184.00
Thomas G Prince	$950	4.9		4,655.00
Christopher Cuomo	$910	3.7		3,367.00
Chase Hood	$850	5.3		4,505.00
Total Professional Hours and Fees		**72.7**	**$**	**87,895.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Draft demonstrative for counsel for Committee presentation	0.6
09/11/2025	DM	Revise draft issues lists for ModivCare cash management, critical vendor and DIP motions	0.7
09/15/2025	CC	Begin to prepare presentation on first day motions	0.7
09/15/2025	JA	Draft of supporting slides and provide comments on first day motion summary materials	0.9
09/16/2025	CC	Finalize presentation on first day motions	0.9
09/16/2025	MDG	Review and revise presentation to Committee on first and second day motions	2.5
09/16/2025	TGP	Create slides summarizing analysis of the Debtors' first day motions	2.2
09/16/2025	TGP	Update slides summarizing analysis of the Debtors' first day motions based on internal comments	1.1
09/17/2025	CH	Draft variance and liquidity demonstrative for weekly Committee materials	1.3
09/17/2025	CC	Finalize presentation on first day motions re: critical vendor slide	1.1
09/17/2025	DM	Review, revise and comments on draft presentation for ModivCare UCC	1.2
09/17/2025	DM	Review, revise and comments on several iterations of a revised draft presentation to ModivCare re: updates	1.7
09/17/2025	JA	Draft of Committee deck re: first day motion and other updates	1.2
09/17/2025	KBM	Review and revise weekly Committee update presentation	0.9
09/17/2025	MDG	Review changes to Committee presentation re: first day motions	2.0
09/17/2025	TGP	Create slides summarizing the Debtors' actual performance to budget	0.8
09/17/2025	TGP	Update presentation slides for call with the Committee based on internal comments	0.4
09/17/2025	TGP	Update slides summarizing analysis of the Debtors' first day motions based on internal comments	0.7
09/18/2025	DM	Review and revise draft presentation to ModivCare UCC per W&C comments	0.6
09/18/2025	DM	Review ModivCare revised motion to pay trade vendors and amend UCC update deck	0.4
09/18/2025	DM	Revise draft presentation to ModivCare UCC re: weekly updates	0.5
09/18/2025	TGP	Update presentation materials for call with Committee based on comments from counsel	0.2
09/22/2025	CC	Update presentation on SOFA/SOALs re: assets	0.9
09/22/2025	CC	Update presentation on SOFA/SOALs re: claims	2.5
09/23/2025	CC	Finalize updates to presentation on SOFA/SOALs re: assets, claims, and payments	2.4
09/23/2025	CC	Update presentation on SOFA/SOALs after feedback from M. Gates of AlixPartners	2.2
09/23/2025	MDG	Review SOFA/SOAL presentation	1.8
09/24/2025	JA	Review and provide comments to Committee presentation materials	1.0
09/24/2025	KBM	Review and revise weekly Committee update presentation	0.9
09/24/2025	TGP	Update weekly slides for Committee call based on internal comments	0.7
09/25/2025	CC	Finalize updates to presentation on SOFA/SOALs re: employees	0.7
09/25/2025	TGP	Update slides summarizing analysis of SOFAs / SOALs based on responses from FTI	0.4
09/29/2025	MDG	Update SOFA/SOAL presentation for comments from K. McGlynn	0.8
09/30/2025	MDG	Finalize SOFA / SOAL presentation and send to W&C	0.4

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	TGP	Create slides summarizing analysis of FTI's proposed fee structure	0.9
09/30/2025	TGP	Create slides summarizing analysis of Moelis' proposed fee structure	1.2
Total Professional Hours			**39.4**

AlixPartners

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Re: Preparation of Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.1	$	7,446.00
Kathryn B McGlynn	$1,415	1.8		2,547.00
Joel Amico	$1,150	3.1		3,565.00
Matthew D Gates	$1,120	7.5		8,400.00
Thomas G Prince	$950	8.6		8,170.00
Christopher Cuomo	$910	11.4		10,374.00
Chase Hood	$850	1.9		1,615.00
Total Professional Hours and Fees		**39.4**	**$**	**42,117.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/11/2025	DM	Attend meeting with C. Shandler (FTI), A. Steinberg (Moelis) re: ModivCare FA kick off	0.5
09/11/2025	DM	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	DM	Prepare for meeting with C. Shandler (FTI), A. Steinberg (Moelis) re: ModivCare financial advisor kickoff	0.5
09/11/2025	JA	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/11/2025	KBM	Call with C. Shandler, A. Steinberg (FTI), D. MacGreevey, K. McGlynn, J. Amico, and A. Panda (AlixPartners) re: case updates and next steps	0.5
09/12/2025	DM	Email C. Shandler (FTI) and A. Steinberg (Moelis) re: ModivCare diligence	0.3
09/13/2025	DM	Email C. Shandler (FTI) and A. Steinberg (Moelis) re: ModivCare diligence	0.3
09/15/2025	CH	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	CC	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	DM	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/15/2025	JA	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, C. Cuomo and C. Hood re: ModivCare DIP budget diligence items	0.6
09/16/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	JA	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4
09/16/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood, and C. Cuomo (AlixPartners) and C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: critical vendor motion and trade vendor program	0.7
09/16/2025	KBM	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4
09/16/2025	MDG	Participate in call with K. McGlynn, M. Gates, and J. Amico (AlixPartners) and C. Shandler, J. Shapiro and D. Kiyosaki (FTI) re: vendor motion	0.4

AlixPartners

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Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	DM	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	JA	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	JL	Attend discussion with C. Shandler, J. Shapiro, D. Kiyosaki (FTI), D. MacGreevey, J. Amico, J. Lee (AlixPartners) re: ModivCare government contracts	0.5
09/17/2025	TGP	Email communications with FTI re: the Debtors' variance report for the period ended September 7	0.2
09/19/2025	DM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	GM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	0.2
09/19/2025	JA	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	JL	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	KBM	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	RK	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/19/2025	TGP	Meeting with D. MacGreevey, K. McGlynn, G. Magrisi (partial attendance), J. Lee, J. Amico, R. Komendowski, T. Prince (AlixPartners), C. Shandler, J. Shapiro, D. Kiyosaki (FTI) re: 2026 projections and case updates	1.0
09/24/2025	MDG	Review FTI responses to questions re: SOFA and SOAL	0.5
09/25/2025	MDG	Call with J. Shapiro and D. Kiyosaki (FTI) re: intercompany transfers	0.2
09/29/2025	MDG	Correspondence with FTI re: due diligence list and call	0.5
09/30/2025	AP	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	GM	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	JW	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	JA	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	JL	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	KBM	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	MDG	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	RK	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
09/30/2025	TGP	Call with J. Shapiro, and others (FTI), K. McGlynn, J. Lee, A. Panda, R. Komendowski, J. Amico, M. Gates, T. Prince, J. Wang, G. Magrisi (AlixPartners) re: outstanding diligence requests	0.5
Total Professional Hours			**23.8**

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Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.9	$	7,154.00
Kathryn B McGlynn	$1,415	3.1		4,386.50
Greg Magrisi	$1,250	0.7		875.00
Jerry Wang	$1,225	0.5		612.50
Johnny Lee	$1,225	2.0		2,450.00
Ashutosh Panda	$1,150	0.5		575.00
Joel Amico	$1,150	4.2		4,830.00
Matthew D Gates	$1,120	2.1		2,352.00
Ryan Komendowski	$1,080	1.5		1,620.00
Thomas G Prince	$950	1.7		1,615.00
Christopher Cuomo	$910	1.3		1,183.00
Chase Hood	$850	1.3		1,105.00
Total Professional Hours and Fees		**23.8**	**$**	**28,758.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Draft potential DIP issues	0.8
09/10/2025	CH	Review DIP motion and DIP term sheet	1.7
09/10/2025	CH	Review discovery requests in connection with DIP and RSA	0.7
09/11/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/11/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/11/2025	JA	Analyze DIP budget and prepare diligence questions	1.1
09/11/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Hood (AlixPartners) re: ModivCare DIP work plan	0.5
09/12/2025	CH	Review initial approved DIP budget	1.1
09/12/2025	CH	Screen for potential comparable DIP facilities	1.8
09/12/2025	TGP	Analyze the Debtors' DIP motion	2.2
09/15/2025	CH	Analyze DIP financing terms for selected comparable facilities	2.8
09/15/2025	CH	Continue to analyze DIP financing terms for selected comparable facilities	2.6
09/15/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	CH	Research DIP motions and final orders for comparable DIP facilities	1.9
09/15/2025	CH	Research restructuring support agreements and disclosure statements for related comparable DIP facility cases	1.2
09/15/2025	CC	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	CC	Review 10-K and DIP budget in advance of DIP budget call	0.4
09/15/2025	CC	Review DIP comparables for inclusion in analysis on costs	0.3
09/15/2025	CC	Summarize notes from intro call for D. MacGreevey and J. Amico of AlixPartners	0.4
09/15/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: ModivCare DIP budget	0.2
09/15/2025	JA	Review and analysis of underlying DIP model and assumptions	1.2
09/15/2025	JA	Review DIP comps and supporting analysis	1.0
09/16/2025	CH	Analyze dilution and equity splits in relation to equitized backstop fees for comparable DIP facilities	2.3
09/16/2025	CH	Analyze disclosure statements for comparable DIP facilities re: plan equity value	1.9
09/16/2025	CH	Analyze restructuring support agreements for comparable DIP facilities re: DIP backstop fee economics	2.4
09/16/2025	CH	Review draft DIP model re: receipt buildup and transportation disbursements	0.7
09/16/2025	JA	Review DIP issues and collateral issues	1.4
09/16/2025	KBM	Review DIP budget and related items	0.7
09/17/2025	CH	Draft updates to DIP comps analysis	2.1
09/17/2025	CH	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	CH	Research re: expanded comp set for DIP facilities	1.8
09/17/2025	CH	Research re: unencumbered asset values	0.6

AlixPartners

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/17/2025	CC	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	CC	Review DIP comparable transactions related to fees with a specific emphasis on backstop fees	3.0
09/17/2025	JA	Analyze potential unencumbered assets	0.8
09/17/2025	JA	Draft of issues list and supporting analysis of DIP objection	0.7
09/17/2025	JA	Participate in a call with J. Amico, C. Hood, and C. Cuomo (AlixPartners) re: review of DIP comparables	0.6
09/17/2025	JL	Review receivables and information in DIP/Cash collateral motions	0.7
09/18/2025	CH	Analyze extended DIP budget forecast	1.2
09/18/2025	CH	Analyze Moelis DIP comp set and compare to AlixPartners comp set	1.1
09/18/2025	CH	Draft analysis re: proposed DIP financing internal rate of return	1.7
09/18/2025	CH	Internal call with M. Gates and C. Hood (AlixPartners) re: DIP comps analysis	0.5
09/18/2025	JL	Prepare for DIP financing and cash collateral motion/objection/affidavit	0.7
09/18/2025	MDG	Internal call with M. Gates and C. Hood (AlixPartners) re: DIP comps analysis	0.5
09/18/2025	MDG	Review DIP comp data	2.2
09/19/2025	CH	Analyze extended DIP budget scenario analysis	0.5
09/19/2025	CH	Call with M. Gates and C. Hood (AlixPartners) re: DIP IRR calculation and DIP comps analysis	0.3
09/19/2025	CH	Draft updated DIP comps analysis as requested by counsel	1.5
09/19/2025	CH	Draft updates to DIP comps analysis and demonstratives to reflect comments from W&C	2.1
09/19/2025	CH	Draft updates to DIP comps analysis to incorporate comments from M. Gates (AlixPartners)	1.2
09/19/2025	CH	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	CH	Research additional comparable DIP facilities in Southern District of Texas	0.6
09/19/2025	CH	Review document production related to DIP budget and prepetition liquidity reporting	1.4
09/19/2025	CH	Review restructuring proposals and board materials re: proposed backstop fee and estimated equity value	1.3
09/19/2025	CC	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	DM	Draft MacGreevey declaration in support of ModivCare DIP objection	1.0
09/19/2025	DM	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	JA	Review DIP comps and prepare issue list	0.8
09/19/2025	MDG	Call with M. Gates and C. Hood (AlixPartners) re: DIP IRR calculation and DIP comps analysis	0.3
09/19/2025	MDG	Draft bullets for W&C re: DIP comparable research	0.5
09/19/2025	MDG	Internal discussion with D. MacGreevey, M. Gates, C. Hood and C. Cuomo (AlixPartners) re: analysis of ModIvCare DIP comps	0.8
09/19/2025	MDG	Research two precedent DIP backstop fees	1.5
09/19/2025	MDG	Review DIP comparables schedule	2.0
09/20/2025	CH	Correspondence with team re: extended DIP forecast assumptions	0.5

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/20/2025	CH	Research re: plan equity value for ModivCare and related DIP comps	0.8
09/20/2025	CH	Review draft DIP objection	0.7
09/20/2025	CH	Review extended case timeline analysis and related assumptions	0.6
09/20/2025	CC	Review DIP budget and budget extension analysis	1.7
09/20/2025	CC	Review liquidity and DIP comparables analysis in advance of meeting with W&C	0.7
09/20/2025	DM	Analyze extended ModivCare DIP budget	0.6
09/20/2025	DM	Analyze ModivCare DIP comp set	1.0
09/20/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.7
09/20/2025	JA	Analysis and development of extended DIP budget	1.5
09/20/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.7
09/20/2025	JA	Review filings and underlying DIP budget	1.0
09/20/2025	MDG	Research comparable DIP backstop fees	0.8
09/21/2025	CH	Analyze extended budget forecast and related assumptions	0.7
09/21/2025	CH	Research re: additional potential DIP comps	1.3
09/21/2025	CC	Continue to evaluate cash flow and working capital for DIP objection	1.6
09/21/2025	CC	Review investment banking fees and associated analysis	1.4
09/21/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.5
09/21/2025	DM	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare case extension analysis	0.5
09/21/2025	DM	Exact research	0.3
09/21/2025	DM	Review and comments on draft objection to ModivCare DIP motion	1.0
09/21/2025	DM	Review and comments on email from J. Amico re: ModivCare DIP objection	0.3
09/21/2025	DM	Review draft extension of ModivCare DIP budget	0.8
09/21/2025	DM	Review email from S. Spitzer re: details of Exela DIP	0.2
09/21/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare case extension analysis	0.5
09/21/2025	JA	Discussion with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare extended budget	0.5
09/21/2025	JA	Draft of revised cash analysis to extend timeline	1.5
09/21/2025	KBM	Review DIP motion to identify potential objectionable issues	1.1
09/21/2025	KBM	Review DIP objection for potential revisions	0.9
09/21/2025	MDG	Research comparable DIP backstop fees	1.0
09/21/2025	MDG	Review draft DIP objection	0.8
09/22/2025	CH	Analyze forecasted DIP interest and DIP sizing	0.6
09/22/2025	CH	Draft analysis re: extended cash flow forecast and related assumptions	1.1
09/22/2025	CH	Review and draft updates to DIP terms comps analysis	2.1
09/22/2025	CH	Review initial draft DIP declaration and provide comments	0.5
09/22/2025	CH	Review revised DIP objection and DIP declarations	0.8
09/22/2025	CH	Review year to date actuals re: weekly and monthly operating cash flow	0.8
09/22/2025	DM	Communication with C. Hood (AlixPartners) re: ModivCare DIP comps	0.2
09/22/2025	DM	Communication with C. Hood, M. Gates and R. Komendowski (AlixPartners) re: ModivCare DIP analysis	0.5

AlixPartners

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/22/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee	0.3
09/22/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee valuation	0.2
09/22/2025	DM	Revise draft MacGreevey declaration in support of ModivCare DIP objection	0.8
09/22/2025	JA	Analyze requests from W&C re: DIP collateral	0.5
09/22/2025	JA	Analyze seasonality and other cash flow items to develop go forward view	0.5
09/22/2025	JA	Develop go forward cash projection based on analyzing existing cash flow forecast	1.4
09/22/2025	JA	Review and provide comments on DIP objection	0.5
09/22/2025	KBM	Review D. MacGreevey declaration re: DIP objection and revisions	0.9
09/22/2025	KBM	Review sets of revisions to DIP objection	1.1
09/22/2025	MDG	Complete detailed review of DIP comparables	2.5
09/22/2025	MDG	Review and comment on DIP declaration	0.5
09/22/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee	0.3
09/22/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare DIP fee valuation	0.2
09/23/2025	CH	Analyze illustrative plan valuation and related backstop fee equity value	0.8
09/23/2025	CH	Correspondence with A. Zatz and others (W&C), D. MacGreevey, J. Amico, and M. Gates (AlixPartners) re: DIP objection and DIP comps	1.2
09/23/2025	CH	Draft updates to DIP comps analysis to reflect comments from D. MacGreevey (AlixPartners)	1.8
09/23/2025	CH	Finalize DIP comps exhibits for DIP declaration	1.4
09/23/2025	CH	Research comparable DIP facilities without a backstop fee for potential inclusion into comp set	1.4
09/23/2025	CH	Review and provide comments to revised draft DIP objection and DIP declaration	1.7
09/23/2025	CC	Review DIP objection for consistency with financial analysis and other edits	0.8
09/23/2025	DM	Review draft MacGreevey declaration in support of UCC objection to ModivCare DIP motion	3.1
09/23/2025	DM	Revise MacGreevey declaration in support of UCC objection to ModivCare DIP motion	3.2
09/23/2025	JA	Analyze success fee calculations	0.3
09/23/2025	JA	Preparation of supporting schedules and analysis for DIP related declaration	1.0
09/23/2025	JA	Review DIP objection, draft comments and provide backup analysis for support	1.6
09/23/2025	JA	Review professional fee detail from DIP budget and evaluate alternative scenarios	0.7
09/23/2025	KBM	Review DIP issues list	0.4
09/23/2025	KBM	Review revised DIP budget sensitivity analysis	0.9
09/23/2025	KBM	Review updated DIP objection	0.9
09/23/2025	MDG	Review and comment on DIP declaration and objection	1.0
09/23/2025	MDG	Review DIP comparables for DIP declaration	2.5
09/24/2025	CH	Analyze revised DIP comps analysis prepared by Moelis	1.6
09/24/2025	CH	Correspondence with W&C team re: DIP comps and deposition topics	0.7

AlixPartners

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Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	CH	Draft outline of deposition topics and support	2.8
09/24/2025	JA	Review items per discovery documents re: historical transactions	1.3
09/24/2025	KBM	Review information related to DIP comps	0.4
09/24/2025	MDG	Review DIP comparables	1.5
09/24/2025	MDG	Review documents used in preparation of DIP comparables in preparation for D. MacGreevey deposition	1.0
09/24/2025	MDG	Review Moelis DIP comparables	1.5
09/25/2025	CH	Call with A. Chase (W&C) re: documents relied upon for D. MacGreevey deposition	0.3
09/25/2025	CH	Compile supporting documents for D. MacGreevey (AlixPartners) declaration	2.2
09/25/2025	CH	Continue telephonic attendance of Z. Jamal (Moelis) deposition	1.0
09/25/2025	CH	Continue to compile supporting documents for D. MacGreevey (AlixPartners) declaration	1.4
09/25/2025	CH	Correspondence with W&C team and D. MacGreevey (AlixPartners) re: DIP comps and upcoming depositions	0.8
09/25/2025	CH	Research and analysis re: plan value, equity value, and exit financing for comparable DIP facilities	1.2
09/25/2025	JA	Review comps used for DIP comparison	0.5
09/25/2025	MDG	Attend conclusion of Z. Jamal (Moelis) deposition	1.3
09/25/2025	MDG	Attend deposition of Z. Jamal (Moelis)	2.5
09/25/2025	MDG	Research DIP comparables mentioned in Z. Jamal (Moelis) deposition	1.0
09/26/2025	MDG	Review DIP comparables cited by Moelis in deposition	1.5
09/27/2025	CH	Correspondence with M. Gates and D. MacGreevey (both AlixPartners) re: DIP comps analysis	0.5
09/27/2025	DM	Review MacGreevey declaration and exhibits in support off UCC objection to ModivCare DIP to prepare for upcoming deposition	5.5
09/27/2025	MDG	Review DIP comparable issues list from D. MacGreevey	1.0
09/28/2025	CH	Call with M. Gates and C. Hood (AlixPartners) re: DIP comps	0.2
09/28/2025	CH	Draft updates to backstop fee analysis for comps	1.4
09/28/2025	CH	Preparation of support and research re: DIP fee comps	1.5
09/28/2025	CH	Review deposition transcript for Z. Jamal (Moelis) re: DIP financing	1.3
09/28/2025	DM	Prepare for deposition	1.5
09/28/2025	MDG	Review and comment on DIP comparables analysis	1.4
09/28/2025	MDG	Call with M. Gates and C. Hood (AlixPartners) re: DIP comps	0.2
09/29/2025	CH	Working session with D. MacGreevey, M. Gates (AlixPartners), and J. Zakia and others (W&C) re: prepare for D. MacGreevey deposition re: DIP objection	2.9
09/29/2025	CH	Discussion with D. MacGreevey, C. Hood (AlixPartners) re: ModivCare deposition post mortem and testimony preparation	1.0
09/29/2025	CH	Meeting with C. Shore and others (W&C) re: DIP hearing preparation	1.2
09/29/2025	CH	Working session with D. MacGreevey, M. Gates (AlixPartners), and J. Zakia and others (W&C) re: prepare for D. MacGreevey deposition re: DIP objection	2.9
09/29/2025	CH	Review Debtor and lender replies to DIP objection	1.2
09/29/2025	CC	Attend deposition of D. MacGreevey re: DIP objection	2.0
09/29/2025	DM	Attend MacGreevey ModivCare deposition	2.3

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/29/2025	DM	Discussion with D. MacGreevey, C. Hood (AlixPartners) re: ModivCare deposition post mortem and testimony preparation	1.0
09/29/2025	DM	Prepare for ModivCare MacGreevey deposition	5.3
09/29/2025	KBM	Review items related to DIP objection	0.9
09/29/2025	MDG	Attend D. MacGreevey DIP deposition	2.4
09/29/2025	MDG	Review DIP objection responses	1.2
09/30/2025	CH	Continue to prepare for DIP hearing with D. MacGreevey (AlixPartners), and J. Zakia and others (W&C)	2.7
09/30/2025	CH	Prepare for DIP hearing with D. MacGreevey (AlixPartners), and J. Zakia and others (W&C)	2.8
09/30/2025	DM	Attend D. MacGreevey testimony and DIP hearing preparation	6.0
09/30/2025	JA	Respond to requests for information and perform analysis for W&C re: DIP hearing	1.2
Total Professional Hours			**213.7**

AlixPartners

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Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	38.3	$	55,918.00
Kathryn B McGlynn	$1,415	8.2		11,603.00
Johnny Lee	$1,225	1.4		1,715.00
Joel Amico	$1,150	23.5		27,025.00
Matthew D Gates	$1,120	33.4		37,408.00
Ryan Komendowski	$1,080	0.5		540.00
Thomas G Prince	$950	2.2		2,090.00
Christopher Cuomo	$910	13.9		12,649.00
Chase Hood	$850	92.3		78,455.00
Total Professional Hours and Fees		**213.7**	**$**	**227,403.00**

AlixPartners

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Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/12/2025	CH	Review accounts payable and proposed vendor program payment detail	1.3
09/12/2025	CH	Review professional fee forecast	0.6
09/12/2025	CH	Review variance reporting for week ending 8/24	0.6
09/12/2025	CH	Review variance reporting for week ending 8/30	0.7
09/15/2025	TGP	Analyze the Debtors' cash management interim order	0.2
09/15/2025	TGP	Analyze the Debtors' cash management motion	1.4
09/15/2025	TGP	Analyze the Debtors' DIP budget with respect to liquidity projections	2.6
09/15/2025	TGP	Analyze the Debtors' variance reporting through the week ended August 31	1.2
09/16/2025	CC	Research transportation expense for DIP budget	1.1
09/16/2025	JA	Review cash flow reporting and comparison to budget	0.5
09/16/2025	TGP	Analyze documents provided in data room	1.4
09/16/2025	TGP	Analyze the Debtors' liquidity projections	2.4
09/17/2025	CH	Analyze variance reporting package for week ended 9/7	0.7
09/17/2025	TGP	Analyze the Debtors' variance to budget through the period ended September 7	1.7
09/17/2025	TGP	Draft questions for FTI re: actual performance versus budget	0.3
09/18/2025	JA	Development of liquidity scenarios based on company provided cash flow and business plan projections	1.5
09/18/2025	TGP	Analyze the Debtors' weekly liquidity projections	1.4
09/19/2025	JA	Develop analysis to extend case timeline	1.5
09/21/2025	TGP	Analyze the Debtors' weekly liquidity projections	1.3
09/22/2025	CH	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	CC	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	CC	Research liquidity and cash flow related to contracts, transportation expense, minimum liquidity, and cash	1.7
09/22/2025	DM	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	JA	Analyze historical cash flow performance	0.9
09/22/2025	JA	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/22/2025	TGP	Analyze the Debtors' DIP budget projections	1.7
09/22/2025	TGP	Discussion with D. MacGreevey, J. Amico, C. Cuomo, C. Hood, T. Prince (AlixPartners) re: ModivCare cash flow projection	0.7
09/23/2025	CC	Continue analysis of DIP budget and extension of case scenario	2.4
09/23/2025	CC	Participate in a call with J. Amico and C. Cuomo (AlixPartners) re: review of DIP budget extension model	0.5
09/23/2025	JA	Participate in a call with J. Amico and C. Cuomo (AlixPartners) re: review of DIP budget extension model	0.5
09/23/2025	TGP	Analyze the Debtors' DIP budget projections	1.1
09/24/2025	CH	Review liquidity and variance reporting package for week ended 9/14	0.8
09/24/2025	CC	Call with C. Cuomo, T. Prince (AlixPartners) re: liquidity analysis	0.2
09/24/2025	CC	Update weekly variance update deck in advance of committee meeting	2.8
09/24/2025	TGP	Analyze changes to the DIP budget over time	1.3
09/24/2025	TGP	Analyze the Debtors' variance report for the week ended September 14th	0.6

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/24/2025	TGP	Call with C. Cuomo, T. Prince (AlixPartners) re: liquidity analysis	0.2
09/25/2025	CC	Finalize weekly variance update deck in advance of Committee meeting	0.6
09/25/2025	TGP	Analyze the Debtors' DIP budget projections	1.2
09/26/2025	JA	Analyze liquidity scenarios under assumptions	1.0
09/27/2025	CC	Edit and review liquidity analysis files for preparation before sending to W&C	0.6
09/27/2025	CC	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/27/2025	CC	Respond to questions from D. MacGreevey of AlixPartners related to liquidity and revolver	1.4
09/27/2025	DM	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/27/2025	JA	Analyze liquidity scenarios and prepare summary output	1.0
09/27/2025	JA	Participate in a call with D. MacGreevey, J. Amico, and C. Cuomo (AlixPartners) re: liquidity assessment and cash flows	1.0
09/29/2025	JA	Analyze cash variance reports and prepare diligence questions	0.5
09/29/2025	JA	Prepare cash flow scenario schedules	0.7
09/29/2025	TGP	Analyze the Debtors' variance report for the period ended September 21st	0.8
09/30/2025	CC	Respond to question from J. Amico (AlixPartners) re: contracts	0.2
09/30/2025	TGP	Analyze variance report for week ended September 21st	0.4
Total Professional Hours			**52.0**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Joel Amico	$1,150	9.8		11,270.00
Thomas G Prince	$950	21.9		20,805.00
Christopher Cuomo	$910	13.2		12,012.00
Chase Hood	$850	5.4		4,590.00
Total Professional Hours and Fees		**52.0**	**$**	**51,159.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	TGP	Analyze the Debtors' operating model with projections through 2026	0.8
09/17/2025	AP	Review files uploaded to the data room by Debtors to identify relevant files supporting Debtors' financial projections	1.5
09/17/2025	TGP	Analyze the Debtors' operating model with projections through 2026	1.1
09/18/2025	AP	Analyze Debtors' financial projections and supporting documents for NEMT with a focus on revenue, rate and volume trends, and customer contracts	2.4
09/18/2025	JA	Review underlying financial model and prepare diligence questions	1.1
09/18/2025	TGP	Analyze the Debtors' operating model	1.6
09/19/2025	GM	Call with J Wang, G Magrisi (AlixPartners) re: business plan assessment document review and planning	0.4
09/19/2025	JW	Call with J Wang, G Magrisi (AlixPartners) re: business plan assessment document review and planning	0.4
09/19/2025	JA	Review business plan and develop issues for diligence call with company	1.5
09/19/2025	JL	Review preliminary information on business plan and note follow up items	0.6
09/19/2025	TGP	Analyze the Debtors' 2026 projections	1.6
09/22/2025	AP	Analyze Debtors' financial projections and supporting documents for NEMT with a focus on expenses, including service costs	2.8
09/22/2025	AP	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	AP	Review Debtors' purchased services schedule for NEMT with a focus on vendor and third party provider costs	2.6
09/22/2025	CH	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	CC	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	GM	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	JW	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/22/2025	LL	Reviewed and annotated internal management memorandums re: current operating model, business challenges, and go-forward assumptions, formulated initial working hypotheses	1.2
09/22/2025	LL	Call with G. Magrisi, J. Wang, A. Panda, L. Lovattao, C. Cuomo, and C. Hood (AlixPartners) re: business plan workstream and approach	0.6
09/23/2025	AP	Analyze Debtors' financial projections and supporting documents for PCS with a focus on expenses, including service costs	2.8
09/23/2025	AP	Analyze Debtors' financial projections and supporting documents for PCS with a focus on revenue, hours and rate trends, customer contracts	2.5
09/23/2025	AP	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	AP	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	DM	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/23/2025	GM	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	GM	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	GM	Participate in a call with G. Magrisi, S Clark (AlixPartners) re: business plan workstreams and project plan	0.4
09/23/2025	JW	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	JW	Participate in a call with D, MacGreevey, G. Magrisi, J. Wang, A. Panda (AlixPartners) re: business plan workstreams and project plan	0.3
09/23/2025	LL	Review historical profit & loss statements provided by management; identified revenue/cost trends, normalized adjustments, and areas requiring clarification	2.4
09/23/2025	LL	Participate in a call with G. Magrisi, J. Wang, A. Panda, L. Lovatto (AlixPartners) re: business plan workstreams and project plan	0.6
09/23/2025	SC	Participate in a call with G. Magrisi, S Clark (AlixPartners) re: business plan workstreams and project plan	0.4
09/24/2025	AP	Analyze Debtors' financial projections and supporting documents for RPM with a focus on expenses, including service costs	2.6
09/24/2025	AP	Analyze Debtors' financial projections and supporting documents for RPM with a focus on revenue, hours and rate trends, customer contracts	2.7
09/24/2025	AP	Develop customer contract revenue waterfall with key volume and rate metrics for NEMT business	2.4
09/24/2025	SC	Prepare high-level view functional distribution of headcount for business plan workstream.	1.7
09/24/2025	SC	Review client financial documents and organizational charts for business plan workstream.	0.9
09/24/2025	TGP	Analyze the Debtors' business plan model	2.3
09/25/2025	AP	Develop customer contract revenue waterfall with key volume and rate metrics for NEMT business	2.8
09/25/2025	AP	Develop project plan and time line with key milestones for Debtors' business plan review	1.5
09/25/2025	AP	Prepare key revenue and cost drivers for ModivCare businesses to pressure test Debtors' financial projections	2.7
09/25/2025	LL	Prepare questionnaire for management re: assumptions for financial projections, performance improvement initiatives and cost-out programs.	1.6
09/25/2025	SC	Analyze materials received from Debtors for business plan workstream.	0.6
09/25/2025	TGP	Analyze the Debtors' business plan model	2.9
09/26/2025	AP	Analyze customer contract revenue waterfall with key volume and rate metrics for NEMT business for the top 20 contracts	2.7
09/26/2025	AP	Compile key questions for Debtors' management and data requests on the Debtors' latest financial projections and FY26-30 business plan	2.1
09/26/2025	AP	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/26/2025	AP	Review Debtors' latest financial projections re: business plan and valuation disclosure filed on 9/23	2.5
09/26/2025	GM	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	JW	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	JL	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	LL	Update data request form to include additional business plan requests and flagged critical items for prioritization by Management	1.2
09/26/2025	LL	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	RK	Participate in a call with G. Magrisi, J. Wang, A. Panda , L. Lovatto, J. Lee, R. Komendowski (AlixPartners) re: critical data request, initial hypotheses and next steps	0.6
09/26/2025	RK	Review latest business plan produced and corresponding assumptions.	2.4
09/26/2025	SC	Prepare materials in relation to business plan workstream, specifically around data requirements and questions for management.	0.6
09/26/2025	TGP	Analyze investment banker fees in comparable cases	2.7
09/26/2025	TGP	Analyze the Debtors' business plan model	1.3
09/29/2025	AP	Analyze customer contract attrition and revenue impacts for NEMT business for the top 20 contracts	2.3
09/29/2025	AP	Analyze Segment level projections in the Debtors' business plan and valuation disclosure filed on 9/23	2.8
09/29/2025	LL	Preparation of financial models by business unit (NEMT, PCS, RPM/Higi) with variance analysis	1.8
09/29/2025	SC	Analyze documents received from Debtors re: on going cost savings initiatives to weave into hypotheses for business plan workstream	1.4
09/29/2025	SC	Analyze financial data, including understanding historical trends and future projections, provided by Debtors and SEC filings for business plan workstream	2.8
09/29/2025	SC	Analyze staffing / organization related documents provided by Debtors to create questions and hypotheses for business plan workstream	2.3
09/29/2025	SC	Review financial data, including understanding historical trends and future projections, provided by Debtors and SEC filings for business plan workstream	1.7
09/29/2025	TGP	Analyze the Debtors' 2026 projections	1.3
09/29/2025	TGP	Research the Debtors' cleansing materials filed in 2025	1.1
09/30/2025	AP	Analyze customer contract attrition and revenue impacts for PCS business for the top 20 contracts	2.6
09/30/2025	AP	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	AP	Prepare summary of information requests to discuss with Debtors' financial advisor in support of FY26-30 business plan	1.9
09/30/2025	AP	Research market and growth outlook for each segment re: Debtors' business plan projections filed on 9/23	2.7
09/30/2025	LL	Analyze historical (2022-2024) and projections (2025-2030) for service expense across business units and assessment of cost improvement levers	2.4
09/30/2025	LL	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
09/30/2025	SC	Analyze historical and future looking cost data for business plan workstream	2.6
09/30/2025	SC	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
09/30/2025	SC	Create materials visualizing trends in historical and future looking costs and revenue for business plan workstream	2.9
09/30/2025	SC	Review materials visualizing trends in historical and future looking costs and revenue for business plan workstream	2.3
09/30/2025	TGP	Call with A. Panda, S. Clark, L. Lovatto, T. Prince (AlixPartners) re: business plan analysis	0.4
Total Professional Hours			**115.6**

AlixPartners

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Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Greg Magrisi	$1,250	2.9		3,625.00
Jerry Wang	$1,225	2.5		3,062.50
Johnny Lee	$1,225	1.2		1,470.00
Ashutosh Panda	$1,150	51.4		59,110.00
Joel Amico	$1,150	2.6		2,990.00
Ryan Komendowski	$1,080	3.0		3,240.00
Thomas G Prince	$950	17.1		16,245.00
Christopher Cuomo	$910	0.6		546.00
Susan Clark	$910	20.6		18,746.00
Chase Hood	$850	0.6		510.00
Lucas Lovatto	$835	12.8		10,688.00
Total Professional Hours and Fees		**115.6**	**$**	**120,670.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	TGP	Analyze documents from the Debtors provided through discovery with respect to retention programs	0.8
09/21/2025	TGP	Analyze Moelis retention application	1.4
09/22/2025	MDG	Review analysis of Moelis fees	0.7
09/22/2025	TGP	Analyze Moelis fee structure	1.2
09/23/2025	TGP	Analyze Moelis fee structure	0.9
09/23/2025	TGP	Review FTI retention application	0.4
09/23/2025	TGP	Review Moelis retention application	0.4
09/24/2025	MDG	Call with M. Gates, T. Prince (AlixPartners) re: analysis of retention applications for Moelis and FTI	0.2
09/24/2025	TGP	Call with M. Gates, T. Prince (AlixPartners) re: analysis of retention applications for Moelis and FTI	0.2
09/25/2025	TGP	Analyze FTI's retention application	1.1
09/25/2025	TGP	Review data room documents with respect to the Debtors' business plan	2.7
09/29/2025	TGP	Analyze success fees in comparable cases	2.8
09/30/2025	MDG	Review analysis of Debtors' professional fees	0.8
09/30/2025	TGP	Analyze investment banking fees in comparable cases	1.4
09/30/2025	TGP	Analyze success fees in comparable cases	1.1
Total Professional Hours			**16.1**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

PROFESSIONAL	RATE	HOURS	FEES
Matthew D Gates	$1,120	1.7	1,904.00
Thomas G Prince	$950	14.4	13,680.00
Total Professional Hours and Fees		**16.1**	**$ 15,584.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CH	Review first day declaration re: company and case background	1.6
09/10/2025	JA	Review background information and first day filings	1.7
09/10/2025	TGP	Analyze the Debtors' 2024 10-K	1.2
09/10/2025	TGP	Analyze the Debtors' first day declaration	1.7
09/11/2025	CH	Download data room documents to internal site for team	1.1
09/11/2025	CH	Initial review of data room document uploads	1.4
09/11/2025	CC	Create and edit due diligence request list across 13 week cash flow, DIP, M&A, investigation and other categories	2.6
09/11/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: organize due diligence request list	0.3
09/11/2025	JA	Draft intro due diligence questions	1.5
09/11/2025	JA	Review key legal issues based on Akin input	0.7
09/11/2025	JL	Review initial request list	0.6
09/11/2025	JL	Review case filings to prepare for kick off	0.6
09/11/2025	MDG	Review initial due diligence material provided	2.4
09/11/2025	TGP	Analyze documents provided in care package from the Debtors	2.6
09/11/2025	TGP	Analyze the Debtors' first day declaration	1.1
09/11/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: organize due diligence request list	0.3
09/11/2025	TGP	Review discovery notices in connection with creation of initial diligence request list	0.6
09/11/2025	TGP	Update diligence list with initial diligence requests	1.4
09/11/2025	TGP	Update initial diligence request list with additional requests	0.6
09/12/2025	CC	Make additional updates to due diligence request re: business plan and formatting	2.3
09/12/2025	DM	Review revised ModivCare diligence tracker	0.5
09/12/2025	DM	Revise draft ModivCare diligence tracker	0.8
09/12/2025	JA	Review background information and update to due diligence list	1.6
09/12/2025	JA	Review historical financial filings and disclosures	1.0
09/12/2025	MDG	Further review of due diligence material provided	0.8
09/12/2025	MDG	Review due diligence list and provide comments	1.0
09/12/2025	TGP	Analyze the Debtors' first day declaration	1.3
09/12/2025	TGP	Review documents provided by the Debtors in connection with initial diligence requests	1.2
09/13/2025	DM	Review and revise the ModivCare diligence tracker	0.5
09/15/2025	CH	Download and review new uploads to data room	1.2
09/15/2025	CC	Prepare indexing for data room downloads	0.8
09/15/2025	CC	Update due diligence tracker for data received	0.4
09/15/2025	JA	Update to due diligence list based on data room files	0.5
09/15/2025	KBM	Review information available in data room	0.3
09/15/2025	KBM	Review information re: CMS receivables	0.4
09/15/2025	MDG	Review data room provided by Debtors	2.5
09/16/2025	CH	Research 10-K filings re: CMS and government receivables	0.6
09/16/2025	CC	Draft email to D. MacGreevey (AlixPartners) summarizing key terms of critical vendor motion	0.6
09/16/2025	CC	Review 10-K and earnings transcript for general business and financial trends	0.6

AlixPartners

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Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/16/2025	DM	Email with attachments with internal counsel re: ModivCare NDA	0.3
09/16/2025	JA	Review company public disclosures and analysis of prior transactions	1.5
09/16/2025	KBM	Review draft revisions to critical vendor order	0.8
09/16/2025	KBM	Review information related to unencumbered assets and related value	0.4
09/16/2025	MDG	Review W&C document re: unencumbered assets	1.5
09/17/2025	DM	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	DM	Review ModivCare 10-K re: CMS exposure	0.7
09/17/2025	JA	Review data room and update diligence list for revised cash forecast requests	1.0
09/17/2025	JA	Review documents from W&C discovery request	1.2
09/17/2025	JL	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	KBM	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	MDG	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	MDG	Research Debtors' New Jersey contracts and RFP	0.4
09/17/2025	MDG	Research unencumbered assets	0.8
09/17/2025	TGP	Analyze collateral package for the Debtors' prepetition debt	1.4
09/17/2025	TGP	Analyze the Debtors' interest in the Matrix JV	1.3
09/17/2025	TGP	Call with D. MacGreevey, K. McGlynn, M. Gates, J. Lee, T. Prince (AlixPartners) re: ModivCare unencumbered assets	0.5
09/17/2025	TGP	Review comments to the Debtors' proposed final cash management order	0.4
09/18/2025	CH	Continue review of Relativity document production for documents relative to DIP and liquidity workstreams	2.6
09/18/2025	CH	Review Relativity document production for documents relative to DIP and liquidity workstreams	2.7
09/18/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: data room documents	0.3
09/18/2025	CC	Review files in data room disclosure for case analysis	2.4
09/18/2025	KBM	Review revised critical vendor motion	0.6
09/18/2025	TGP	Analyze documents from the Debtors provided through discovery with respect board materials	1.2
09/18/2025	TGP	Analyze the Debtors' collateral package for prepetition debt	0.9
09/18/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: data room documents	0.3
09/19/2025	CC	Begin analysis of SOFAs and SOALs	2.3
09/19/2025	CC	Continue analysis of SOFAs and SOALs re: payments and assets	2.9
09/19/2025	CC	Call with C. Cuomo and M. Gates (AlixPartners) re: SOFA/SOAL presentation	0.2
09/19/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: review of diligence tracker and discovery	0.5
09/19/2025	CC	Research comparable companies for valuation	1.1
09/19/2025	CC	Review discovery files and organize associated diligence tracker	0.9
09/19/2025	JA	Analyze customer contracts and corresponding payment timing to develop go forward liquidity view	1.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/19/2025	MDG	Call with C. Cuomo and M. Gates (AlixPartners) re: SOFA/SOAL presentation	0.2
09/19/2025	MDG	Begin presentation on SOFAs and SOALs	0.4
09/19/2025	MDG	Review due diligence request list	0.5
09/19/2025	TGP	Analyze the Debtors' interest in the Matrix JV	1.4
09/19/2025	TGP	Analyze the Debtors' schedules of assets and liabilities	1.1
09/19/2025	TGP	Analyze the Debtors' statements of financial affairs	0.9
09/19/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: review of diligence tracker and discovery	0.5
09/19/2025	TGP	Review documents provided by the Debtors in comparison to diligence requests	0.8
09/19/2025	TGP	Update diligence request list	0.6
09/20/2025	CC	Continue analysis of SOFAs and SOALs re: assets by debtor	2.6
09/20/2025	CC	Prepare analysis of SOFAs and SOALs re: liabilities and claims	1.4
09/21/2025	MDG	Research information on unencumbered assets in SOALs	2.5
09/22/2025	CH	Review new items uploaded to virtual data room	0.6
09/22/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: analyze SOFA/SOALs payments and assets	0.7
09/22/2025	KBM	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	KBM	Review analysis of unencumbered assets and related value	0.6
09/22/2025	MDG	Continue unencumbered assets analysis	1.3
09/22/2025	MDG	Review diligence list for unencumbered assets requests	0.8
09/22/2025	TGP	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	TGP	Analyze the Debtors' historical financials	1.6
09/22/2025	TGP	Analyze the Debtors' joint venture interests	1.6
09/22/2025	TGP	Analyze the Debtors' reported assets	1.4
09/22/2025	TGP	Call with K. McGlynn, M. Gates, T. Prince (AlixPartners) re: analysis of the Debtors' assets	0.3
09/22/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: analyze SOFA/SOALs payments and assets	0.7
09/23/2025	JA	Analyze underlying financial projection detail to evaluate supporting assumptions	0.8
09/23/2025	JA	Review data room and analysis of documents	0.5
09/23/2025	TGP	Analyze the Debtors' schedules of assets and liabilities	1.9
09/23/2025	TGP	Analyze the Debtors' statements of financial affairs	2.4
09/23/2025	TGP	Draft questions for FTI re: the SOFAs and SOALs	0.4
09/23/2025	TGP	Review documents uploaded to the data room in response to diligence requests	0.8
09/23/2025	TGP	Update diligence tracker based on documents uploaded to the data room	0.4
09/24/2025	CC	Respond to question from D. MacGreevey of AlixPartners related to letters of credit and net debt	0.3
09/24/2025	KBM	Review outstanding information requests	0.4
09/24/2025	TGP	Analyze the Debtors' SOALs	1.2
09/24/2025	TGP	Analyze the Debtors' SOFAs	1.1
09/25/2025	CC	Download documentation related to comparables and DIP budget extension to be shared with W&C	0.8
09/25/2025	JA	Review capital structure assumptions in Plan and reconcile with Plan documents	1.0

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	JA	Review discovery requests and prepare responses	0.7
09/25/2025	JA	Review sets of financial projections and reconcile of changes	1.2
09/25/2025	TGP	Analyze the Debtors' historical financials	1.3
09/26/2025	CH	Review financial model and related assumptions re: go-forward business plan	2.1
09/26/2025	CC	Respond to questions associated with information request list and document production	0.3
09/26/2025	JA	Review data room documents related to financial projections support and draft diligence questions	1.0
09/26/2025	JA	Review documents produced by Debtors and prepare follow up questions	1.5
09/26/2025	KBM	Review 2025-2030 financial projections	1.1
09/26/2025	MDG	Continue unencumbered assets analysis	1.5
09/27/2025	JA	Preparation of materials for deposition prep	1.5
09/27/2025	MDG	Update and send diligence list to FTI	0.4
09/28/2025	JA	Prepare summary financial information for W&C	0.5
09/29/2025	JA	Analyze certain prepetition vendor payment status and prepare analysis	0.8
09/29/2025	JA	Analyze historical cash projections and changes over time	0.8
09/29/2025	JA	Prepare financial analyses for W&C background	1.5
09/29/2025	KBM	Revise SOFA/Schedules presentation for the Committee	0.8
09/29/2025	MDG	Research 8-K filings for prior financial projections	0.8
09/29/2025	TGP	Analyze the Debtors' historical financials	1.3
09/30/2025	AP	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	GM	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JW	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JA	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	JA	Review data room and perform update of diligence list for required information	1.3
09/30/2025	JL	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	KBM	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	KBM	Finalize SOFA/Schedules presentation to the Committee	0.3
09/30/2025	LL	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/30/2025	MDG	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	MDG	Prepare analysis of unencumbered assets	1.5
09/30/2025	RK	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	SC	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
09/30/2025	TGP	Analyze the Debtors' historical financials	1.1
09/30/2025	TGP	Call with K. McGlynn, M. Gates, J. Amico, G. Magrisi, A. Panda, L. Lovatto, S. Clark, T. Prince, J. Wang, J. Lee, R. Komendowski (AlixPartners) re: outstanding diligence requests and next steps	0.4
Total Professional Hours			**140.0**

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.3	$	4,818.00
Kathryn B McGlynn	$1,415	6.9		9,763.50
Greg Magrisi	$1,250	0.4		500.00
Jerry Wang	$1,225	0.4		490.00
Johnny Lee	$1,225	2.1		2,572.50
Ashutosh Panda	$1,150	0.4		460.00
Joel Amico	$1,150	25.4		29,210.00
Matthew D Gates	$1,120	20.2		22,624.00
Ryan Komendowski	$1,080	0.4		432.00
Thomas G Prince	$950	41.5		39,425.00
Christopher Cuomo	$910	24.3		22,113.00
Susan Clark	$910	0.4		364.00
Chase Hood	$850	13.9		11,815.00
Lucas Lovatto	$835	0.4		334.00
Total Professional Hours and Fees		**140.0**	**$**	**144,921.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	CC	Compare critical vendor motion and interim order to precedent cases to establish appropriate modification requests	0.7
09/10/2025	CC	Review critical vendor motion and interim order	0.4
09/10/2025	JA	Review cash first day motion and declaration materials to prepare issues list	1.0
09/10/2025	MDG	Review first day motions and prepare issues lists	2.5
09/10/2025	TGP	Analyze the Debtors' cash management motion	0.6
09/10/2025	TGP	Create issues list re: the Debtors' cash management motion	0.4
09/11/2025	KBM	Review issues related to cash management and critical vendor motions	0.9
09/11/2025	MDG	Finalize and send list of issues with cash management motion to D. MacGreevey	0.4
09/12/2025	TGP	Analyze the Debtors' cash management motion in comparison to other cases	0.9
09/12/2025	TGP	Analyze the Debtors' cash management motion noticing and reporting terms	0.6
09/12/2025	TGP	Analyze the Debtors' motion to pay prepetition claims	0.4
09/15/2025	CH	Review and summarize procedural first day motions	0.7
09/15/2025	CH	Review and summarize taxes and fees motion	0.9
09/15/2025	CH	Review and summarize trading procedures and net operating losses motion	0.6
09/15/2025	CH	Review and summarize utilities motion	0.7
09/15/2025	JA	Review and provide comments on first day motion and prep for upcoming FTI call	1.1
09/15/2025	MDG	Review first day motions	2.5
09/15/2025	TGP	Analyze the Debtors' customer programs motion	1.1
09/15/2025	TGP	Analyze the Debtors' insurance motion	0.8
09/15/2025	TGP	Analyze the Debtors' wages motion	1.3
09/16/2025	DM	Call with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor program analysis	0.3
09/16/2025	DM	Review email from C. Cuomo (AlixPartners) re: cross reference of our ModivCare trade vendor motion issues list to W&C markup	0.3
09/16/2025	DM	Review W&C comments to final ModivCare trade vendor order	0.3
09/16/2025	JA	Call with D. MacGreevey, J. Amico (AlixPartners) re: ModivCare trade vendor program analysis	0.3
09/16/2025	MDG	Review and provide comments to W&C on critical vendor motion	0.5
09/16/2025	MDG	Review W&C markup of cash management motion	0.7
09/18/2025	JA	Diligence on revised vendor motion and draft of issues list	1.0
09/18/2025	MDG	Review updated draft of cash management motion	0.3
09/22/2025	CH	Review lease rejection motion in relation to lease claims analysis	0.8
09/22/2025	CH	Review Moelis retention application re: DIP financing related fees	0.4
09/22/2025	CH	Review ordinary course professionals motion	0.3
09/24/2025	JA	Preparation of supporting details for depositions	0.9
09/24/2025	KBM	Review updates to Cash Management order	0.6
09/24/2025	MDG	Review updates to cash management motion	0.5
09/25/2025	MDG	Email to D. MacGreevey and K. McGlynn re: intercompany transfers and cash management motion	0.2
09/26/2025	JA	Attend deposition of Chad Shandler (FTI)	2.0
09/26/2025	JL	Participate and listen in on C. Shandler (FTI) Deposition	2.1
Total Professional Hours			**30.0**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Kathryn B McGlynn	$1,415	1.5		2,122.50
Johnny Lee	$1,225	2.1		2,572.50
Joel Amico	$1,150	6.3		7,245.00
Matthew D Gates	$1,120	7.6		8,512.00
Thomas G Prince	$950	6.1		5,795.00
Christopher Cuomo	$910	1.1		1,001.00
Chase Hood	$850	4.4		3,740.00
Total Professional Hours and Fees		**30.0**	**$**	**32,302.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	CH	Review general unsecured and lease claim analysis prepared by Debtors	0.9
Total Professional Hours			**0.9**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Chase Hood	$850	0.9	$	765.00
Total Professional Hours and Fees		**0.9**	**$**	**765.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	MR	Research ModivCare business segments for guideline company analysis.	1.7
09/10/2025	RK	Review case materials for background research and valuation ramp.	1.5
09/11/2025	JM	Assess uptier transaction.	1.4
09/11/2025	JM	Review First Day Declaration.	2.1
09/11/2025	JM	Review ModivCare's 2024 10-K.	0.6
09/11/2025	MB	Conduct valuation analysis	0.6
09/11/2025	MR	Analyze guideline companies for ModivCare valuation analysis.	1.8
09/11/2025	RK	Research ModivCare comparable company for valuation.	2.8
09/11/2025	RK	Research ModivCare comparable company payer mix for valuation.	2.6
09/12/2025	JM	Assess ModivCare's capital structure.	1.8
09/12/2025	JM	Review analyst reports.	0.7
09/12/2025	JM	Search Capital IQ for historical medical transport transactions.	2.5
09/12/2025	MB	Review data request list	0.3
09/12/2025	MR	Analyze guideline company financial metrics for ModivCare valuation analysis.	2.7
09/12/2025	MR	Review ModivCare analyst reports for guideline company analysis.	2.0
09/12/2025	RK	Research guideline company transactions for valuation analysis.	0.9
09/12/2025	RK	Review disclosure statement for case background.	2.1
09/12/2025	RK	Review documents provided by counsel for valuation analysis.	3.0
09/15/2025	JM	Search Capital IQ for historical medical transport transactions.	1.4
09/15/2025	JM	Search Capital IQ for historical personal care transactions.	2.8
09/15/2025	JM	Update valuation analysis.	1.7
09/15/2025	MB	Conducted valuation research	0.8
09/15/2025	MR	Develop guideline company method for ModivCare valuation.	2.0
09/15/2025	MR	Review EBITDA forecast from data room for ModivCare valuation analysis.	1.9
09/16/2025	DM	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare Allston workstream	0.2
09/16/2025	DM	Email to M. Brown, J. Kopa and M. Rule (AlixPartners) re: valuation workstream	0.3
09/16/2025	JM	Review S&P credit rating reports.	1.6
09/16/2025	JM	Search Capital IQ for historical personal care transactions.	1.0
09/16/2025	MB	Conducted valuation analysis	0.3
09/16/2025	MR	Research ModivCare segment financial performance for guideline company valuation analysis.	2.1
09/16/2025	RK	Discussion with D. MacGreevey, R. Komendowski (AlixPartners) re: ModivCare Allston workstream	0.2
09/17/2025	DM	Review and distribute CVs for proposed ModivCare valuation expert candidates to W&C team	0.6
09/17/2025	JM	Update valuation analysis.	2.8
09/17/2025	MR	Perform analysis of monitoring segment guideline companies for ModivCare valuation analysis.	2.8
09/17/2025	MR	Prepare guideline transaction analysis for ModivCare valuation.	2.2
09/17/2025	RK	Preparation of AMCI valuation analysis.	1.4
09/17/2025	RK	Review guideline company comparables for valuation analysis.	2.0
09/18/2025	JM	Review Board of Directors meeting materials.	0.7
09/18/2025	JM	Review FTI cash flow projections.	1.7

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	MR	Review Matrix segment financial information in ModivCare public filings.	2.9
09/18/2025	RK	Review documents produced for AMCI valuation analysis.	2.3
09/19/2025	CC	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	JM	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	JM	Review Board of Directors meeting materials.	3.0
09/19/2025	JM	Review ModivCare advisor presentations.	2.6
09/19/2025	JM	Update valuation analysis.	1.4
09/19/2025	MR	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/19/2025	MR	Perform research re: health care industry companies for market approach analysis.	1.0
09/19/2025	MR	Review guideline company analyst reports for ModivCare valuation analysis.	2.1
09/19/2025	RK	Review current business plan produced for AMCI valuation analysis.	2.0
09/19/2025	TGP	Participate in a call with M. Root, J. Morimoto, T. Prince, and C. Cuomo (AlixPartners) re: joint venture and trading comparables	0.4
09/20/2025	DM	Review analysis of ModivCare post emergence equity dilution	0.4
09/22/2025	MR	Perform analysis of ModivCare capital structure for valuation analysis.	0.8
09/22/2025	RK	Review documents produced for AMCI valuation analysis.	1.8
09/23/2025	MR	Perform analysis of ModivCare capital structure for valuation analysis.	0.4
09/23/2025	RK	Preparation of AMCI valuation analysis.	2.8
09/24/2025	RK	Review document production for business plans.	2.3
09/25/2025	RK	Preparation of AMCI valuation analysis.	0.8
09/25/2025	RK	Review historical board meeting materials from document production for projection analysis.	2.6
09/29/2025	JM	Draft valuation report.	3.0
09/29/2025	JM	Review advisor presentations.	1.7
09/29/2025	JM	Update valuation analysis	2.6
09/29/2025	MR	Prepare draft presentation materials for ModivCare valuation analysis.	2.3
09/29/2025	RK	Review documents produced for business plan review.	2.0
09/30/2025	JM	Draft valuation report.	3.0
09/30/2025	JM	Review analyst reports.	1.3
09/30/2025	JM	Update valuation analysis.	2.4
09/30/2025	MR	Analyze financial metrics for guideline companies for ModivCare valuation analysis.	2.1
09/30/2025	MR	Analyze market data for guideline companies for ModivCare valuation analysis.	1.5
09/30/2025	MR	Perform segment analysis of ModivCare guideline companies for valuation analysis.	3.0
09/30/2025	RK	Review documents produced for valuation analysis.	1.3
Total Professional Hours			**118.6**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Marc Brown	$1,415	2.0		2,830.00
Ryan Komendowski	$1,080	34.4		37,152.00
Matthew Root	$1,000	35.7		35,700.00
Thomas G Prince	$950	0.4		380.00
Christopher Cuomo	$910	0.4		364.00
Jyoji Morimoto	$910	44.2		40,222.00
Total Professional Hours and Fees		**118.6**	**$**	**118,838.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/10/2025	TGP	Analyze the Debtors' RSA with respect to treatment of creditors	1.6
09/11/2025	CH	Review plan and disclosure statement re: exit financing and claim recovery mechanics	1.8
09/12/2025	TGP	Analyze the Debtors' RSA	0.8
09/12/2025	TGP	Analyze the Debtors' RSA term sheet	0.6
09/24/2025	CH	Analyze filed financial projections and valuation and related assumptions	1.1
09/24/2025	CH	Analyze filed liquidation analysis and related assumptions	0.9
09/24/2025	DM	Review filed ModivCare disclosure statement exhibits and memo to team re: diligence of same	1.2
09/24/2025	DM	Prepare memorandum to AlixPartners' internal team re: ModviCare disclosure statement exhibits and diligence of same	0.5
09/24/2025	JA	Review Disclosure Statement filed exhibits and prepare diligence questions	1.5
09/24/2025	MDG	Review disclosure statement exhibits	1.4
09/26/2025	KBM	Review initial settlement offer	0.3
09/30/2025	MDG	Review disclosure statement objection	0.8
Total Professional Hours			**12.5**

AlixPartners

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Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Kathryn B McGlynn	$1,415	0.3		424.50
Joel Amico	$1,150	1.5		1,725.00
Matthew D Gates	$1,120	2.2		2,464.00
Thomas G Prince	$950	3.0		2,850.00
Chase Hood	$850	3.8		3,230.00
Total Professional Hours and Fees		**12.5**	**$**	**13,175.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/18/2025	DM	Attend hearing re: ModivCare trade vendor payment motion	0.5
09/18/2025	KBM	Attend hearing re: critical vendor motion	0.4
09/25/2025	CH	Telephonic attendance of Z. Jamal (Moelis) deposition	2.9
09/26/2025	CC	Attend deposition of C. Shandler (FTI) re: extension of budget	1.9
09/29/2025	CH	Attend deposition of D. MacGreevey (AlixPartners) re: DIP objection	1.8
09/29/2025	JA	Attend MacGreevey deposition	2.2
09/30/2025	CH	Attend hearing re: DIP objection	1.5
09/30/2025	CH	Continue to attend hearing re: DIP objection	2.0
09/30/2025	CH	Attend ModivCare DIP hearing breakout meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, L. Miranda (W&C), D. MacGreevey and C. Hood (AlixPartners) re: DIP objection	2.0
09/30/2025	DM	Attend ModivCare DIP hearing	3.5
09/30/2025	DM	Attend ModivCare DIP hearing breakout meeting with C. Shore, A. Greissman, J. Zakia, A. Chase, L. Miranda (W&C), D. MacGreevey and C. Hood (AlixPartners) re: DIP objection	2.0
09/30/2025	JA	Attend DIP hearing	3.0
09/30/2025	KBM	Attend DIP hearing	3.5
09/30/2025	MDG	Attend continued DIP hearing	1.6
09/30/2025	MDG	Attend DIP hearing	1.6
Total Professional Hours			**30.4**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.0	$	8,760.00
Kathryn B McGlynn	$1,415	3.9		5,518.50
Joel Amico	$1,150	5.2		5,980.00
Matthew D Gates	$1,120	3.2		3,584.00
Christopher Cuomo	$910	1.9		1,729.00
Chase Hood	$850	10.2		8,670.00
Total Professional Hours and Fees		**30.4**	**$**	**34,241.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/11/2025	BF	Draft engagement letter	1.1
09/11/2025	BF	Draft AlixPartners retention documents	2.1
09/11/2025	DM	Begin review ModivCare retention package	0.6
09/11/2025	DM	Continue review of draft ModivCare retention package	0.8
09/11/2025	SH	Review ModiveCare UCC retention documents	0.4
09/16/2025	KSM	Correspondence with D. MacGreevey and S. Rosenfeld (AlixPartners), D. Litz (W&C) re: retention	0.2
09/17/2025	JB	Prepare parties in interest list for firm database	1.2
09/17/2025	JB	Review parties in interest list for disclosure purposes	0.8
09/18/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Car-Iron	1.8
09/18/2025	JB	Draft disclosures to be included in retention documents for parties beginning with 111-Cap	1.6
09/19/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Nati-Ros	1.9
09/19/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Ive-Nat	1.7
09/22/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Tru-Ze	1.4
09/22/2025	JB	Draft disclosures to be included in retention documents for parties beginning with RSU-Tri	1.6
09/22/2025	KSM	Correspondence with J. Braverman (AlixPartners) re: relationship disclosures	0.2
09/23/2025	JB	Update draft disclosures to be included in retention documents in response to comments from K. Sundt McClarren (AlixPartners)	0.6
09/23/2025	KSM	Edit draft relationship disclosures	1.2
09/23/2025	KSM	Revise draft AlixPartners' retention documents	0.6
09/26/2025	JB	Compare updated parties in interest list to previous version for disclosure purposes	1.1
09/26/2025	JB	Draft disclosures to be included in retention documents for parties beginning with 1A-Bi	1.7
09/26/2025	JB	Prepare list for firm database with additional parties in interest	2.4
09/26/2025	SH	Correspondence re: discovery requests with J. Amico and S. Rosenfeld (AlixPartners)	0.4
09/29/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Del-Ind	1.6
09/29/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Bin-Deb	1.8
09/30/2025	JB	Continue to draft disclosures to be included in retention documents for parties beginning with Pac-Ver	2.9
09/30/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Ind-Orl	1.9
Total Professional Hours			**33.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.4	$	2,044.00
Kaitlyn Sundt McClarren	$715	2.2		1,573.00
Sari Hammer	$660	0.8		528.00
Brooke Filler	$605	3.2		1,936.00
Jennifer Braverman	$565	26.0		14,690.00
Total Professional Hours and Fees		**33.6**	**$**	**20,771.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Discovery
Code: 20015424PA0001.1.21

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/25/2025	CH	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	DM	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	JA	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	MDG	Discussion with D. MacGreevey, J. Amico, M. Gates, C. Cuomo, and C. Hood (AlixPartners) re: declaration support and Modivcare document production	0.5
09/25/2025	MDG	Produce documents in response to discovery request	0.3
Total Professional Hours			**2.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Discovery
Code: 20015424PA0001.1.21

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Joel Amico	$1,150	0.5		575.00
Matthew D Gates	$1,120	0.8		896.00
Chase Hood	$850	0.5		425.00
Total Professional Hours and Fees		**2.3**	**$**	**2,626.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
09/29/2025	CH	Travel from Lufkin, TX to Houston, TX (for D. MacGreevey deposition preparation)	2.0
09/29/2025	DM	Travel from New York, NY to W&C Houston, TX (to attend ModivCare deposition and DIP hearing)	6.0
09/30/2025	CH	Travel from Houston, TX to Lufkin, TX (return from DIP hearing)	3.0
Total Professional Hours			**11.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.0	$	8,760.00
Chase Hood	$850	5.0		4,250.00
Total Professional Hours and Fees		**11.0**	**$**	**13,010.00**
Less 50% Travel Fees				(6,505.00)
Total Professional Fees			**$**	**6,505.00**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
09/25/2025	Airfare David MacGreevey 2025-09-29 LGA- IAH	340.49
09/27/2025	Taxi/Car Service David MacGreevey Home to LGA airport	144.94
09/29/2025	Taxi/Car Service David MacGreevey Iah airport to Client office	119.47
09/29/2025	Roundtrip mileage from Home to White & Case Houston office. Mileage Chase Hood 235 Miles	164.50
09/29/2025	Lodging David MacGreevey - JW Marriott, Houston, TX 2025-09-29 2025-09-30	500.00
09/29/2025	Lodging Chase Hood JW Marriott, Houston, TX 2025-09-29 2025-09-30	432.37
09/29/2025	Individual Meal - David MacGreevey - Breakfast	9.93
09/29/2025	Group Meal - David MacGreevey - Dinner - David MacGreevey; Chase Hood	150.00
09/30/2025	Parking/Tolls Chase Hood Parking - White & Case office	40.00
09/30/2025	Parking/Tolls Chase Hood Hotel parking for deposition and DIP hearing	60.62
09/30/2025	Lodging David MacGreevey JW Marriott, Houston, TX 2025-09-30 2025-10-01	500.00
09/30/2025	Individual Meal - David MacGreevey - Breakfast	53.03
09/30/2025	Individual Meal - Chase Hood - Dinner	39.56
09/30/2025	Individual Meal - Chase Hood - Breakfast	12.87
Total Expenses		**2,567.78**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20014495Pa0001

Expenses		Amount
Airfare		340.49
Ground Transportation		529.53
Lodging		1,432.37
Meals		265.39
Total Expenses	**USD**	**2,567.78**

Exhibit B

Second Monthly Fee Statement
October 1, 2025 through October 31, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: December 17, 2025 @ 4:00 p.m. (CT)

SECOND MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	10/1/2025	10/31/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$1,653,272.80 (80% of $2,066,591.00)	
Total expenses requested in this Fee Statement:	$17,382.17	
Total fees and expenses requested in this Fee Statement:	$1,670,654.97	
Blended hourly rate for professionals:	$1,032.83	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	55.6	$ 81,176.00
Kevin Nystrom	Partner & Managing Director	$1,430	0.2	286.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	37.7	53,345.50
Marc Brown	Partner & Managing Director	$1,415	27.9	39,478.50
Greg Magrisi	Partner & Managing Director	$1,250	35.9	44,875.00
Christopher Rubel	Partner	$1,225	80.1	98,122.50
Jerry Wang	Partner	$1,225	14.2	17,395.00
Johnny Lee	Partner	$1,225	73.9	90,527.50
Elizabeth S Kardos	Partner	$950	3.5	3,325.00
Ashutosh Panda	Director	$1,150	215.0	247,250.00
Joel Amico	Director	$1,150	142.7	164,105.00
Iain Nelson	Director	$1,120	41.7	46,704.00
Matthew D Gates	Director	$1,120	85.2	95,424.00
Ryan Komendowski	Director	$1,080	189.1	204,228.00
Matthew Root	Director	$1,000	105.7	105,700.00
Kaitlyn Sundt McClarren	Director	$715	4.6	3,289.00
Sam Lemack	Senior Vice President	$980	37.3	36,554.00
John Tutty	Senior Vice President	$950	108.6	103,170.00
Thomas G Prince	Senior Vice President	$950	86.5	82,175.00
Christopher Cuomo	Senior Vice President	$910	66.1	60,151.00
Jyoji Morimoto	Senior Vice President	$910	45.3	41,223.00
Susan Clark	Senior Vice President	$910	212.3	193,193.00
Chase Hood	Senior Vice President	$850	119.5	101,575.00

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Professional	Title	Rate	Hours	Fees
Brooke Filler	Senior Vice President	$605	2.4	1,452.00
Jennifer Braverman	Senior Vice President	$565	9.5	5,367.50
Lucas Lovatto	Vice President	$835	162.4	135,604.00
Lisa Marie Bonito	Vice President	$580	18.9	10,962.00
Francisco Carafi	Vice President	$445	15.5	6,897.50
Hugh Olohan	Analyst	$535	3.6	1,926.00
Total Hours and Fees for Professionals			**2,000.9**	**$ 2,075,481.00**
Less: 50% Travel Fees				(8,890.00)
Total Fees for Professionals				**$ 2,066,591.00**
Less: 20% Holdback				(413,318.20)
Total Fees for Professionals Less Holdback				**$ 1,653,272.80**

Average Billing Rate	**$ 1,032.83**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	41.8	$ 47,156.50
1.2	Meetings & Communication with UCC and Creditors	94.0	109,462.00
1.3	Prepare Committee Presentations	39.8	44,698.00
1.4	Meetings & Communication with Debtors	82.0	91,596.00
1.5	Mediation and Settlement Communications	41.5	46,443.50
1.6	DIP Financing and Cash Collateral	1.3	1,500.50
1.7	Liquidity and Cash Management	27.5	26,760.00
1.9	Business and Strategic Plan	803.6	799,469.50
1.10	Employee Compensation and Advisor Retention Matters	5.8	6,626.00
1.11	Financial and Other Diligence	136.8	145,923.00
1.12	Other Motions and Related Objections	12.7	15,680.00
1.13	Litigation Support & Investigations	89.1	93,646.00
1.14	Claims Analysis	104.8	101,254.00
1.15	Valuation and Solvency Analysis	383.6	410,092.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	21.1	22,230.00
1.18	Court Hearings and Status Conferences	18.4	21,752.50
1.19	Retention Application & Relationship Disclosures	21.3	15,331.50
1.20	Fee Applications & Fee Statements	24.5	17,774.00
1.22	Intercompany & Waterfall Analysis	37.3	40,306.00
1.31	Travel Time	14.0	8,890.00
	Total Hours and Fees By Matter Category Before Holdback	**2,000.9**	**$ 2,066,591.00**

Average Billing Rate $ 1,032.83

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
OCTOBER 1, 2025 THROUGH OCTOBER 31, 2025

Expense Category	Amount
Airfare	$ 1,214.39
Client Research	11,973.63
Ground Transportation	1,024.48
Lodging	3,000.00
Meals	169.67
Total Expenses	**$ 17,382.17**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this second monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from October 1, 2025 through October 31, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $2,066,591.00 and reimbursement of out-of-pocket expenses in the amount of $17,382.17 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $1,653,272.80 (80% of $2,066,591.00) and 100% of out-of-pocket expenses in the amount of $17,382.17 for a total amount of $1,670,654.97; and (iii) such other and further relief as this Court deems proper.

Dated: December 3, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Review open items issue and draft of workplan	0.7
10/03/2025	AP	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	CH	Review docket and update case milestone and hearing calendar	0.9
10/06/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	JA	Draft of key items and workplan required to get to Confirmation hearing	1.1
10/06/2025	JL	Call with D. MacGreevey, K. McGlynn, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	LL	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps.	0.5
10/06/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	SC	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5
10/06/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, M. Gates, R. Komendowski, J. Amico, C. Hood, L. Lovatto, A. Panda, S. Clark, G. Magrisi, J. Wang, T. Prince (AlixPartners) re: ongoing workstreams, coordination, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/07/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/07/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.6
10/08/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
10/09/2025	AP	Participate in a call with A. Panda and C. Cuomo (AlixPartners) re: business plan process	0.4
10/13/2025	CC	Review: project deadlines and workstreams	0.4
10/13/2025	JA	Outline of key upcoming deliverables and build out work plan	1.1
10/14/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	CH	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5

AlixPartners

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Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	CC	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	CR	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	GM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	JA	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	JL	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	KBM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	MDG	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	RK	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/14/2025	TGP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.5
10/21/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7

AlixPartners

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Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/21/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ModivCare work plan and strategy and next steps	0.7
10/28/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7

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10/28/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
10/28/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, C. Rubel, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.7
Total Professional Hours			**40.7**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.5	$	3,650.00
Kathryn B McGlynn	$1,415	3.0		4,245.00
Greg Magrisi	$1,250	3.0		3,750.00
Christopher Rubel	$1,225	2.5		3,062.50
Jerry Wang	$1,225	0.5		612.50
Johnny Lee	$1,225	3.0		3,675.00
Ashutosh Panda	$1,150	3.9		4,485.00
Joel Amico	$1,150	5.9		6,785.00
Matthew D Gates	$1,120	3.0		3,360.00
Ryan Komendowski	$1,080	3.0		3,240.00
Thomas G Prince	$950	3.0		2,850.00
Christopher Cuomo	$910	2.3		2,093.00
Susan Clark	$910	0.5		455.00
Chase Hood	$850	3.9		3,315.00
Lucas Lovatto	$835	0.5		417.50
Lisa Marie Bonito	$580	0.2		116.00
Total Professional Hours and Fees		**40.7**	**$**	**46,111.50**

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, ongoing workstreams, and next steps	0.8
10/02/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	DM	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JA	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	JA	Prepare for meeting with Committee re cash performance to date and other case updates	0.6
10/02/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	KBM	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	MDG	Attend meeting with D. MacGreevey, K. McGlynn, J. Amico, M. Gates (AlixPartners), C. Shore, E. Smith and others (W&C) ModivCare UCC professionals updates, strategy and prepare for upcoming UCC call	0.3
10/02/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/02/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, E. Smith (W&C), and Committee members re: case updates, DIP hearing, disclosure statement objection, updates and strategy	0.8
10/03/2025	MDG	Call with R. Biel (W&C) re: unencumbered assets and diligence	0.2
10/04/2025	AP	Review business plan projections	0.1
10/04/2025	AP	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	DM	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	JL	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	MB	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/04/2025	RK	Participate in discussion with C. Shore and J. Zakia (W&C) and D. MacGreevey, M. Brown, R. Komendowski, J. Lee, A. Panda (AlixPartners) re: ModivCare diligence tracker, timelines and status of data requests	0.4
10/08/2025	CH	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	CH	Correspondence with J. Yoo (W&C) re: SOFA diligence items	0.3
10/08/2025	CR	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	JA	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/08/2025	MDG	Call with R. Beil, V. Sachdev, and D. Litz (W&C) re: lien challenges	0.5
10/08/2025	MDG	Draft answers to W&C re: lien challenge questions	0.6
10/08/2025	RK	Call with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier exchange analysis	0.5
10/09/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5

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10/09/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	CH	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	DM	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JW	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JA	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	JA	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	JA	Pre-call with W&C before UCC meeting to discuss agenda	0.5
10/09/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	KBM	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	KBM	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4

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ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	MDG	Attend meeting with A. Zatz, S. Greissman, D. Litz (W&C), D. MacGreevey, K. McGlynn, M. Gates, J. Amico re: prepare for ModivCare Committee call and case updates	0.4
10/09/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/09/2025	MDG	Call with K. McGlynn, J. Amico, M. Gates, C. Hood (AlixPartners), R. Beil and others (W&C) re: diligence requests related to collateral review	0.4
10/09/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, J. Wang, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and strategies	0.5
10/10/2025	MDG	Call with R. Beil (W&C) re: bank accounts	0.2
10/13/2025	CH	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	CR	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	JA	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/13/2025	RK	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C) re: uptier analysis workstream	0.3
10/14/2025	AP	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	AP	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	CH	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	CR	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	DM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	GM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	JA	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	JA	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	JT	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9

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Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	JL	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	KBM	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	MDG	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/14/2025	MR	Analyze Moelis valuation materials.	1.4
10/14/2025	MR	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	MR	Prepare presentation materials for ModivCare valuation.	3.0
10/14/2025	RK	Meeting with C. Rubel, R. Komendowski, J. Amico, A. Panda, M. Root, J. Tutty, C. Hood (AlixPartners), C. Shore and others (W&C) re: valuation analysis	0.9
10/14/2025	RK	Attend meeting with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, J. Amico, M. Gates, R. Komendowski, C. Rubel, J. Lee (AlixPartners) re: case issues and next steps	0.7
10/15/2025	AP	Participate in a call with A. Panda, L. Lovatto (AlixPartners), D. Litz and others (W&C) re: Debtor operations and lien challenge.	0.5
10/15/2025	LL	Participate in a call with A. Panda, L. Lovatto (AlixPartners), D. Litz and others (W&C) re: Debtor operations and lien challenge.	0.5
10/16/2025	AP	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	CR	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore (W&C), D. MacGreevey, J. Lee, C. Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski re: weekly updates and strategies	0.5
10/16/2025	JA	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	JL	Call with D. MacGreevey, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	MDG	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
10/16/2025	MDG	Correspondence with A. Zatz (W&C) re: claims	0.2
10/16/2025	RK	Call with D. MacGreevey, J. Lee, C Rubel, M. Gates, J. Amico, A. Panda, R. Komendowski, (AlixPartners), C. Shore and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

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Re: Meetings & Communication with UCC and Creditors
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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/19/2025	AP	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	DM	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	JA	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	KBM	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	MDG	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	MR	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/19/2025	RK	Attend meeting with D. Litz, E. Feld, V. Sachdev (W&C), D. MacGreevey, K. McGlynn, M. Gates, A. Panda, J. Amico, R. Komendowski, M. Root (AlixPartners) re: ModivCare settlement deck, presentation on company valuation and strategy	0.9
10/20/2025	CH	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	DM	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	DM	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	JA	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	JA	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	JT	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JT	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	MR	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/20/2025	RK	Call with A. Zatz and V. Sachdev (W&C); D. MacGreevey, J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: ModivCare settlement deck	1.1
10/20/2025	RK	Attend meeting with S. Greissman, V. Sachdev (W&C); D. MacGreevey, C. Hood, J. Amico, R. Komendowski, M. Root, and J. Tutty (AlixPartners) re: review of valuation analysis embedded in ModivCare settlement deck	0.3
10/21/2025	AP	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CH	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	CH	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CR	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	CR	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	CR	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	DM	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	DM	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	DM	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	GM	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JA	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	JA	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JA	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	JT	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	JT	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/21/2025	JL	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	MDG	Participate in a call with D. MacGreevey, J. Amico, M. Gates, C Rubel, J. Lee, (AlixPartners) and C. Shore and others (W&C) re: settlement meeting and other case matters	0.6
10/21/2025	MDG	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	RK	Call with D. MacGreevey, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners). Greissman, A. Zatz (W&C), re: review of discussion materials for upcoming UCC meeting, and strategy	0.7
10/21/2025	RK	Meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, C. Hood, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners); D. Mago, D. Litz and S. Greissman (W&C) re: pre-settlement discussion with UCC members	0.9
10/23/2025	AP	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	CH	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/23/2025	CR	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	DM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	DM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	GM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5

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10/23/2025	JA	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	JA	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	JT	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	KBM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	KBM	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	MDG	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, M. Gates, C. Rubel (AlixPartners) re: ModivCare UCC professionals work plan coordination and strategy	0.4
10/23/2025	MDG	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/23/2025	RK	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	RK	Call with K. McGlynn, D. MacGreevey, J. Amico, M. Gates, R. Komendowski, G. Magrisi, A. Panda (AlixPartners); M. Root (Jenner & Block); A. Zatz and D. Litz (W&C) and others re: updates and strategy	0.5
10/23/2025	TGP	Call with M. Gates, T. Prince, C. Hood (AlixPartners) and V. Sachdev (W&C) re: claims analysis by entity	0.2
10/28/2025	AP	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	CR	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	DM	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	JA	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/28/2025	JL	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	KBM	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	MDG	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/28/2025	RK	Attend meeting with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, J. Amico, M. Gates, R. Komendowski, K. McGlynn, A. Panda, C Rubel, J. Lee (AlixPartners) re: ModivCare UCC professionals work plan, upcoming meeting with Committee and strategy	0.4
10/29/2025	KBM	Review updates from Committee Counsel	0.4
10/30/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/30/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
10/30/2025	MDG	Correspondence with W&C re: lien challenge due diligence	0.4
10/30/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Lee, G. Magrisi (AlixPartners) and A. Zatz, S. Greissman, C. Shore, and others (W&C) re: prepare for upcoming Committee call	0.4
10/30/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
Total Professional Hours			**93.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	10.4	$	15,184.00
Kathryn B McGlynn	$1,415	6.7		9,480.50
Marc Brown	$1,415	0.4		566.00
Greg Magrisi	$1,250	4.4		5,500.00
Christopher Rubel	$1,225	5.2		6,370.00
Jerry Wang	$1,225	1.3		1,592.50
Johnny Lee	$1,225	4.9		6,002.50
Ashutosh Panda	$1,150	8.1		9,315.00
Joel Amico	$1,150	13.2		15,180.00
Matthew D Gates	$1,120	9.9		11,088.00
Ryan Komendowski	$1,080	10.6		11,448.00
Matthew Root	$1,000	6.5		6,500.00
John Tutty	$950	4.4		4,180.00
Thomas G Prince	$950	0.2		190.00
Chase Hood	$850	6.4		5,440.00
Lucas Lovatto	$835	0.5		417.50
Total Professional Hours and Fees		**93.1**	**$**	**108,454.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Draft Committee materials re case update and cash flows	1.2
10/01/2025	MDG	Prepare for oral presentation to Committee	0.5
10/01/2025	TGP	Create slides summarizing analysis of the Debtors' liquidity through week ended September 21st	0.6
10/02/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.8
10/02/2025	KBM	Finalize weekly committee update presentation	0.6
10/02/2025	KBM	Prepare for weekly committee presentation	0.6
10/02/2025	MDG	Prepare for oral presentation to Committee on SOFA/SOAL analysis	0.8
10/02/2025	TGP	Update weekly presentation for call with Committee members based on internal comments	0.5
10/03/2025	JA	Draft of preliminary materials for Committee meeting	0.7
10/06/2025	TGP	Update weekly presentation slides re: the Debtors' liquidity and performance	0.8
10/08/2025	JA	Draft materials for UCC committee meeting	1.3
10/08/2025	MDG	Follow up on Committee materials re: ordinary course professionals motion	0.6
10/08/2025	MDG	Update Committee presentation materials	1.7
10/08/2025	TGP	Update weekly presentation slides for call with Committee members	0.6
10/09/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.7
10/09/2025	JA	Draft of slides and perform edits to Committee presentation	1.0
10/09/2025	KBM	Finalize weekly Committee update presentation	0.6
10/09/2025	MDG	Prepare for oral presentation to Committee meeting	0.5
10/10/2025	CC	Begin to frame thesis and support of alternative case in presentation format	2.6
10/10/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates	0.5
10/13/2025	CH	Draft materials for upcoming Committee call re: revised DIP budget and liquidity	1.3
10/13/2025	CH	Draft updates to UCC materials re: revised budget to incorporate comments from J. Amico (AlixPartners)	0.6
10/13/2025	CC	Update presentation outline based on valuation and other industry news	1.4
10/14/2025	CH	Draft updates to Committee materials re: revised DIP budget to incorporate new materials from FTI	0.9
10/15/2025	CC	Review weekly presentation for edits	0.2
10/15/2025	DM	Review draft presentation to ModivCare UCC re: weekly updates	0.6
10/15/2025	JA	Prepare weekly committee update materials	1.3
10/16/2025	KBM	Review weekly update presentation to the Committee	0.7
10/17/2025	JA	Draft of slides for upcoming settlement discussions	1.0
10/20/2025	DM	Review draft presentation to ModivCare UCC re: settlement strategy	1.0
10/20/2025	JA	Draft of material outline and additional analysis required for UCC meeting	1.2
10/21/2025	JA	Prepare slides for Committee re upcoming settlement discussions	1.5
10/22/2025	JA	Prepare materials for Committee meeting	1.5
10/23/2025	DM	Provide comments on draft presentation to ModivCare UCC re: weekly updates and settlement progression	0.7
10/23/2025	JA	Draft of Committee materials re settlement update and next steps	1.5
10/23/2025	KBM	Review changes to weekly Committee update presentation	0.2
10/29/2025	CH	Prepare shell presentation of claims analysis for upcoming Committee meeting	1.1
10/29/2025	DM	Review and provide comments to presentation to ModivCare UCC re: weekly updates	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	JA	Draft of update materials for meeting with Committee including various recovery scenarios and liquidity update	2.0
10/30/2025	CH	Prepare demonstratives and commentary for claims analysis presentation	2.2
10/30/2025	JA	Revisions to Committee materials based on comments received	0.5
10/30/2025	KBM	Review weekly presentation to the Committee	0.7
Total Professional Hours			**39.8**

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Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.8	$	7,008.00
Kathryn B McGlynn	$1,415	3.4		4,811.00
Joel Amico	$1,150	14.7		16,905.00
Matthew D Gates	$1,120	4.1		4,592.00
Thomas G Prince	$950	2.5		2,375.00
Christopher Cuomo	$910	4.2		3,822.00
Chase Hood	$850	6.1		5,185.00
Total Professional Hours and Fees		**39.8**	**$**	**44,698.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	MDG	Correspondence with FTI re: diligence list	0.5
10/06/2025	JW	Review business plan evaluation	1.1
10/07/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	CH	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	JA	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	JL	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	KBM	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	LL	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	MDG	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	RK	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	SC	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/07/2025	TGP	Call with K. McGlynn, J. Lee, J. Wang, J. Amico, M. Gates, R. Komendowski, A. Panda, T. Prince, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.8
10/09/2025	AP	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	CH	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CC	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	CR	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	JA	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	JT	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	LL	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps.	0.7
10/09/2025	MDG	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	MDG	Correspondence with FTI re: datasite access for W&C team	0.3
10/09/2025	MR	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/09/2025	RK	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	TGP	Call with C. Shandler, J. Shapiro, and others (FTI), T. Roberts and others (Moelis), J. Amico, S. Clark, C. Cuomo, M. Gates, C. Hood, R. Komendowski, L. Lovatto, A. Panda, M. Root, C. Rubel, J. Tutty (AlixPartners) re: business plan, outstanding diligence requests, status of providing documents, and next steps	0.7
10/13/2025	MDG	Correspondence with Moelis re: dataroom additional participant	0.2
10/14/2025	AP	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	CH	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	CR	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JW	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JA	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JT	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	JL	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	KBM	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	LL	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/14/2025	MDG	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	RK	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/14/2025	SC	Call with K. McGlynn, J. Lee, J. Wang, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, S. Clark, L. Lovatto (AlixPartners), C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.4
10/16/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	AP	Participate in a call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	AP	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	CH	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	CR	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	CR	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	DM	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	DM	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	JA	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JA	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	JA	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	JT	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JT	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	JL	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	JL	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	JL	Participate in a call with A. Panda, G. Magrisi, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	KBM	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	MDG	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	RK	Call with K. McGlynn, J. Lee, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood, (AlixPartners), C. Shore and other (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.5
10/16/2025	RK	Participate in a call with S. Kern (ModivCare); D. MacGreevey, J. Lee, P. Ash, J. Amico, C. Rubel, R. Komendowski, J. Tutty (AlixPartners); A. Chase (W&C); B. Marks (Latham) and others re: Q1'25 debt transactions and sale processes for the PCS and RPM business segments	2.0
10/16/2025	RK	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/16/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, D. MacGreevey, R. Komendowski, J. Amico, S. Clark, L. Lovatto and C. Cuomo (AlixPartners), C. Shore and others (W&C), K. Shepard and others (ModivCare), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call, review of NEMT	2.1
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JA	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/17/2025	RK	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, R. Komendowski, J. Amico and C. Cuomo (AlixPartners), C. Shore and others (W&C), C. Shandler and others (FTI), A. Magana and others (Moelis), B. Marks and others (Latham), and L. Henrikson and others (Paul Hastings) re: management call with FTI on forecast and process	1.9
10/21/2025	AP	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	CH	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	JA	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3

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10/21/2025	JL	Call with K. McGlynn, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	KBM	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	MDG	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/21/2025	RK	Call with K. McGlynn, J. Lee, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), C. Shore and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	AP	Participate in a call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	CH	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	CR	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	JA	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	JT	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	KBM	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/23/2025	MDG	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3

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10/23/2025	RK	Call with K. McGlynn, C. Rubel, J. Amico, M. Gates, R. Komendowski, A. Panda, J. Tutty, C. Hood (AlixPartners), L. Miranda and others (W&C), B. Marks and others (Latham) C. Shandler and others (FTI), and A. Carlson (Moelis) re: outstanding diligence requests	0.3
10/27/2025	DM	Emails with J. Shapiro (FTI) and J. Amico re: diligence related to projected ModivCare LC's	0.3
10/28/2025	AP	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	CH	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	GM	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	JA	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	MDG	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/28/2025	RK	Call with G. Margrisi, J. Amico, M. Gates, R. Komendowski, A. Panda, C. Hood (AlixPartners), J. Shapiro and others (FTI), and A. Carlson and others (Moelis) re: outstanding diligence requests	0.4
10/30/2025	AP	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	JA	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	JT	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	MDG	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
10/30/2025	RK	Call with R. Komendowski, J. Amico, M. Gates, A. Panda, and J. Tutty (AlixPartners); J. Shapiro (FTI); A. Carlson (Moelis) and others re: outstanding diligence requests	0.3
Total Professional Hours			**82.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with Debtors
Code: 20015424PA0001.1.4

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.4	$	6,424.00
Kathryn B McGlynn	$1,415	2.3		3,254.50
Greg Magrisi	$1,250	4.4		5,500.00
Christopher Rubel	$1,225	3.9		4,777.50
Jerry Wang	$1,225	3.4		4,165.00
Johnny Lee	$1,225	8.0		9,800.00
Ashutosh Panda	$1,150	9.7		11,155.00
Joel Amico	$1,150	9.7		11,155.00
Matthew D Gates	$1,120	4.7		5,264.00
Ryan Komendowski	$1,080	9.7		10,476.00
Matthew Root	$1,000	0.7		700.00
John Tutty	$950	4.2		3,990.00
Thomas G Prince	$950	1.5		1,425.00
Christopher Cuomo	$910	4.7		4,277.00
Susan Clark	$910	3.3		3,003.00
Chase Hood	$850	3.4		2,890.00
Lucas Lovatto	$835	4.0		3,340.00
Total Professional Hours and Fees		**82.0**	**$**	**91,596.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/20/2025	JT	Develop summary of hurdle analysis for presentation	2.8
10/21/2025	CR	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	JA	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	JT	Develop slides to illustrate settlement proposals in advance of UCC meeting	2.7
10/21/2025	JT	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/21/2025	RK	Recreation of company waterfall analysis for settlement meeting discussions.	2.8
10/21/2025	RK	Update to analysis for company valuation slides in advance of committee meeting	1.7
10/21/2025	RK	Working session with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: refinement of slides to discuss settlement proposal	1.1
10/22/2025	CR	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	CR	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	DM	Attend in person ModivCare settlement meetings with Debtors, Lenders and UCC professionals and principals	5.5
10/22/2025	DM	Review materials presented by Debtors at ModivCare settlement meetings	0.8
10/22/2025	JA	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	JA	In person settlement meetings Latham NYC office	5.0
10/22/2025	JA	Working session with J. Amico and J. Tutty (AlixPartners) re: side-by-side comparison of the settlement proposals	1.5
10/22/2025	JA	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	JT	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	JT	Refine side-by-side comparison of settlement offers and proposals	2.2
10/22/2025	JT	Working session with J. Amico and J. Tutty (AlixPartners) re: side-by-side comparison of the settlement proposals	1.5
10/22/2025	JT	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/22/2025	RK	Attend settlement discussions with ModivCare (and advisors), 1L (and advisors), and UCC (and advisors).	5.0
10/22/2025	RK	Call with R. Komendowski, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: analysis of latest settlement offer	0.5
10/22/2025	RK	Working session with J. Amico, R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: finalize slides with a side-by-side comparison of the settlement proposals	0.5
10/29/2025	TGP	Analyze settlement proposals	1.6
Total Professional Hours			**41.5**

AlixPartners

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Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	6.3	$	9,198.00
Christopher Rubel	$1,225	2.1		2,572.50
Joel Amico	$1,150	8.6		9,890.00
Ryan Komendowski	$1,080	11.6		12,528.00
John Tutty	$950	11.3		10,735.00
Thomas G Prince	$950	1.6		1,520.00
Total Professional Hours and Fees		**41.5**	**$**	**46,443.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/05/2025	CH	Analyze prepetition vendor payments	0.6
10/10/2025	KBM	Review updated DIP budget	0.7
Total Professional Hours			**1.3**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: DIP Financing and Cash Collateral
Code: 20015424PA0001.1.6

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	0.7	$	990.50
Chase Hood	$850	0.6		510.00
Total Professional Hours and Fees		**1.3**	**$**	**1,500.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	CH	Review liquidity and variance reporting package for week ended 9/21	0.9
10/01/2025	TGP	Analyze the Debtors' actual performance versus budget through week ended September 21st	1.6
10/02/2025	KBM	Review weekly liquidity update analyses	0.6
10/03/2025	JA	Review liquidity and cash reporting results	0.5
10/06/2025	CH	Review variance reporting package for week ended 9/28	0.7
10/06/2025	JA	Analyze latest variance report and draft liquidity diligence questions	0.7
10/06/2025	TGP	Analyze the Debtors' variance report for the period ended September 28th	0.7
10/06/2025	TGP	Draft questions for the Debtors' re: the variance report for the period ended September 28th	0.4
10/09/2025	KBM	Review weekly liquidity analysis update for Committee	0.4
10/10/2025	CH	Analyze revised DIP budget and related assumptions	1.7
10/10/2025	JA	Analyze revised DIP forecast	0.7
10/13/2025	CH	Draft analysis re: bridge between beginning and ending cash in revised DIP budget	1.6
10/13/2025	CH	Draft bridge analysis and related commentary re: overlapping period between filed and revised DIP budgets	1.8
10/13/2025	CH	Draft comparative analysis re: forecasted and actual liquidity	1.4
10/13/2025	CH	Draft diligence questions for FTI re: revised DIP budget and related assumptions	0.7
10/13/2025	JA	Analyze revised 13 week forecast, reconcile to prior and prepare diligence questions	1.2
10/14/2025	CH	Analyze liquidity bridge analysis between filed and revised DIP budget prepared by Debtors	0.8
10/14/2025	CH	Analyze revised emergence cash sources and uses	0.6
10/14/2025	JA	Review revised cash forecast and reconcile changes to prior version	1.3
10/17/2025	CH	Review variance reporting package for week ended 10/12	0.8
10/20/2025	CH	Draft analysis and demonstratives for weekly liquidity reporting	1.3
10/20/2025	CH	Draft diligence questions for FTI re: weekly liquidity reporting	0.3
10/20/2025	JA	Analyze cash scenarios under various scenarios based on latest Debtor's cash reporting	0.5
10/24/2025	CH	Review variance reporting package for week ended 10/19	0.8
10/24/2025	JA	Review various adjustments at effective date and liquidity status	0.6
10/27/2025	CH	Draft analysis and demonstratives for weekly liquidity reporting for upcoming Committee meeting	1.4
10/27/2025	JA	Review latest cash variance reporting, analyze variance and reconcile to original budget	0.7
10/28/2025	JA	Analyze certain emergence liquidity items and scenarios	1.1
10/29/2025	CH	Review surety bond and letter of credit supporting detail	0.5
10/29/2025	JA	Analyze variance reports and determine impact on go forward liquidity	0.5
10/31/2025	JA	Analyze certain contractual surety and LC requirements	0.7
Total Professional Hours			**27.5**

AlixPartners

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Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	1.0	$	1,415.00
Joel Amico	$1,150	8.5		9,775.00
Thomas G Prince	$950	2.7		2,565.00
Chase Hood	$850	15.3		13,005.00
Total Professional Hours and Fees		**27.5**	**$**	**26,760.00**

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	AP	Analyze customer contract attrition and revenue impacts for RPM business for the top 20 contracts	2.8
10/01/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
10/01/2025	AP	Update Information requests to discuss with Debtor's financial advisor in support of FY26-30 business plan	2.9
10/01/2025	JL	Review data documents and received files and add follow up request items or status inquiry on outstanding items for business plan /financial projections review	1.4
10/01/2025	LL	Analyze service expense as % of revenue data for NEMT, PCS and RPM/Higi to develop hypotheses on performance improvement levers	1.8
10/01/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.9
10/01/2025	SC	Create slides for initial view point on G&A costs for business plan workstream	2.1
10/01/2025	SC	Gather and analyze financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.4
10/01/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	1.6
10/02/2025	AP	Prepare outline of draft business plan review report re: Debtor's business plan projections filed on 9/23	2.7
10/02/2025	AP	Review cost details and unit cost economics for the NEMT business segment	2.5
10/02/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.7
10/02/2025	LL	Conduct initial assessment of segment-level financials and cost allocations; compared plan margins to historical performance and peer benchmarks.	2.8
10/02/2025	LL	Prepare interim report and status updates with market and company research preliminary findings.	0.6
10/02/2025	LL	Research US Home Personal Care Services market to understand historical performance and growth trends for comparison with management's forecast	1.8
10/02/2025	LL	Review management’s consolidated business plan and supporting model to identify key assumptions requiring validation; aligned analytical priorities with Managing Director	2.8
10/02/2025	SC	Create slides for initial view point at business level for discussions with UCC.	2.8
10/02/2025	SC	Develop slides for initial view point on G&A costs for business plan workstream	2.6
10/02/2025	SC	Gather and analyze financial data from publicly available sources and provided by Debtor to create model for business plan workstream	2.4
10/02/2025	SC	Review financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.4
10/02/2025	TGP	Analyze documents uploaded to data room related to the Debtors' business plan	2.6
10/03/2025	AP	Prepare status dashboard for Information requests to discuss with Debtor's financial advisor in support of FY26-30 business plan	3.1
10/03/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.4
10/03/2025	AP	Review new data and files received from Debtor's advisors re: Debtor's business plan projections filed on 9/23	2.9

AlixPartners

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Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	GM	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	JW	Call with G Magrisi, J Wang, and A Panda (AlixPartners) re: business plan data review	0.5
10/03/2025	LL	Analyze September 2025 YTD third-party spend data to identify spending trends, cost drivers, and potential opportunities for vendor optimization	2.4
10/03/2025	LL	Analyze segment-level P&L and EBITDA bridge to evaluate the validity of management's underlying cost assumptions	1.8
10/03/2025	LL	Develop inferences from historical and trend data for PCS, evaluating revenue, service expense, G&A, Adjusted EBITDA, hours billed, wages, and revenue per hour to identify performance drivers and financial patterns	2.4
10/03/2025	LL	Supported sensitivity analysis of NEMT and PCS service expense based on revised EBITDA scenarios	1.4
10/03/2025	SC	Analyze employee census data provided by Debtors to get functional view of headcount costs for business plan workstream	2.9
10/03/2025	SC	Create slides on initial viewpoint of financials and headcount for discussion with UCC.	2.1
10/03/2025	SC	Develop slides for initial view point on G&A costs for business plan workstream	1.3
10/03/2025	SC	Review financial and headcount data to create slides for initial view point on G&A costs for business plan workstream	1.8
10/06/2025	AP	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.6
10/06/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.6
10/06/2025	AP	Update information requests and status dashboard to discuss with Debtor's financial advisor in support of FY26-30 business plan	1.1
10/06/2025	FC	Research ModivCare and subsidiaries public data from 10-k and social networks to define public employment and compensation detail	1.3
10/06/2025	FC	Evaluate data and summarize comparable employment metrics	0.2
10/06/2025	FC	Analyze ModivCare S&M and G&A profiles from public social network	1.8
10/06/2025	FC	Analyze ModivCare COGS and R&D profiles from public social network.	1.9
10/06/2025	FC	Run code to Merge scraped data.	0.3
10/06/2025	GM	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	JW	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	LL	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	LL	Conduct assessment of indirect-spend categories targeted for tail-spend controller program; identified baseline addressable spend and expected savings rates.	2.5
10/06/2025	LL	Perform detailed variance analysis on NEMT ambulatorial segment, comparing actuals vs. forecast and identifying drivers of underperformance.	2.0

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/06/2025	LL	Updated vendor categorization according to cost center, business unit and expense type across fragmented data received	2.5
10/06/2025	SC	Analyze financial and census data for hypothesis creation as part of business plan workstream.	2.8
10/06/2025	SC	Call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, J. Wang (AlixPartners) re: business plan evaluation approach, preliminary findings, and next steps	0.5
10/06/2025	SC	Create support slides for hypothesis developed for G&A functions	2.9
10/06/2025	SC	Develop savings hypothesis for G&A functions as part of business plan workstream.	1.2
10/06/2025	SC	Review slides for hypothesis developed for G&A functions	2.6
10/06/2025	TGP	Analyze the Debtors' historical financials	2.3
10/06/2025	TGP	Analyze the Debtors' projections	2.9
10/07/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.8
10/07/2025	AP	Review cost details and unit cost economics for the NEMT business segment	2.7
10/07/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
10/07/2025	FC	Anonymize company data, translate job titles, and process headcount with ML model.	0.8
10/07/2025	FC	Harmonize and clean collected data removing duplicates and mismatched companies	1.1
10/07/2025	FC	Map employees seniority, geocode data, and group profiles by subsidiary.	2.1
10/07/2025	LL	Analyze supplier-rationalization pipeline; flagged categories with overlapping vendors and limited sourcing leverage.	2.8
10/07/2025	LL	Review 2022-2024 10K and 10Q documents re: service expense composition for each business unit and trends.	1.7
10/07/2025	LL	Review supplier data supporting tail-spend program; identified duplicate vendors and low-value POs suitable for consolidation	2.2
10/07/2025	LL	Updated data request after alignment and clarification with Debtor advisors	0.5
10/07/2025	SC	Create support slides for hypothesis developed for G&A functions	2.8
10/07/2025	SC	Develop savings hypothesis for G&A functions as part of business plan workstream.	2.6
10/07/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.9
10/07/2025	SC	Review slides for hypothesis developed for G&A functions	1.8
10/07/2025	TGP	Analyze the Debtors' board materials with respect to budgets and projections	2.4
10/07/2025	TGP	Analyze the Debtors' projections over time and identify changes for reconciliation	2.6
10/08/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.8
10/08/2025	AP	Review cost details and unit cost economics for the PCS business segment	2.7
10/08/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.9
10/08/2025	CC	Coordinate responsibilities related to business plan	0.4
10/08/2025	FC	Analyze headcount data comparables	1.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/08/2025	FC	Update classification dataset and generate headcount landscape report.	2.9
10/08/2025	FC	Analyze various compensation data for public sources	0.6
10/08/2025	FC	Integrate labor cost data into the final report.	1.5
10/08/2025	JL	Analyze implied financial performance metrics (margins of business segments, historic trend, and potential impact of united healthcare change to business.	1.2
10/08/2025	JL	Provide comments to team on potential areas to address and priorities for business plan/projections review	0.4
10/08/2025	LL	Analyze NEMT contact-center staffing and fully loaded cost of internal HC vs. contracted BPO operators	1.4
10/08/2025	LL	Develop savings bridge linking tail-spend reduction to forecast SG&A improvements.	2.8
10/08/2025	LL	Research personal care, administrative and call center job descriptions on Debtor's website for job function mapping.	2.0
10/08/2025	LL	Review employee census re: service expense organizations to assess baseline	1.8
10/08/2025	SC	Analyze financial and census data to create G&A function hypotheses as part of business plan workstream.	2.7
10/08/2025	SC	Create support slides for hypothesis developed for G&A functions	2.8
10/08/2025	SC	Develop labor model to analyze census data and create hypotheses for G&A functions	2.3
10/08/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.2
10/08/2025	TGP	Analyze the Debtors' historical financials and prepare supporting slides	2.7
10/08/2025	TGP	Analyze the Debtors' projections over time and identify key drivers	2.4
10/09/2025	AP	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	AP	Prepare draft outputs from analysis of NEMT revenue, costs and EBITDA performance	2.4
10/09/2025	AP	Review cost details and unit cost economics for the RPM/Higi business segment	2.1
10/09/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.5
10/09/2025	CC	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	CC	Develop question list for Modivcare re: key drivers	2.2
10/09/2025	CC	Participate in a call with A. Panda and C. Cuomo (AlixPartners) re: business plan process	0.4
10/09/2025	CC	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: review of uptier and EBITDA outlook	0.3
10/09/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: business plan responsibilities	0.5
10/09/2025	CC	Review business plan model drivers and key inputs	2.8
10/09/2025	CC	Review lender presentation, earnings transcripts, and public documents for operating history	2.9
10/09/2025	JL	Add follow up items in tracker for team to address with FTI and Moelis re: the business plan/projections	0.4

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JL	Call with A. Panda, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	JL	Provide comments on analysis for projections and identified savings	0.6
10/09/2025	LL	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps.	0.7
10/09/2025	LL	Evaluate potential cost improvement initiatives for NEMT and PCS contact centers; quantified labor-arbitrage savings and one-time transition costs.	2.2
10/09/2025	LL	Review outsourced labor contracts to compare scope, terms and rates across suppliers	1.4
10/09/2025	LL	Review top outsourced labor vendor contracts re: terms, rates, and structure.	2.0
10/09/2025	LL	Summarize top outsourced labor vendor contracts to compare terms, rates, services provided and contract structures.	1.0
10/09/2025	RK	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: review of uptier and EBITDA outlook	0.3
10/09/2025	SC	Analyze census data and refine data to create baseline as part of business plan workstream.	2.0
10/09/2025	SC	Create labor model based on census data as part of business plan workstream.	2.3
10/09/2025	SC	Research benchmarks and competitor data for hypothesis development for G&A functions as part of business plan workstream.	2.5
10/09/2025	SC	Review labor model based on census data, and research metrics to add as part of business plan workstream.	2.7
10/09/2025	SC	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps.	0.7
10/09/2025	TGP	Analyze changes in operating expenses over time	2.6
10/09/2025	TGP	Analyze the labor related expenses in projection model	2.8
10/09/2025	TGP	Call with A. Panda, J. Lee, S. Clark, L. Lovatto. C. Cuomo, T. Prince (AlixPartners) re: business plan analysis, priority tasks, and next steps	0.7
10/09/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: business plan responsibilities	0.5
10/10/2025	AP	Continue to prepare NEMT Customer Request for Proposal Summary to show the Debtor assumption on request for proposal outcome	2.5
10/10/2025	AP	Prepare NEMT Customer Request for Proposal summary to show key request for proposal milestones, annual contract value, 2025 and 2025 forecast revenue	2.9
10/10/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.6
10/10/2025	CC	Respond to D. MacGreevey (AlixPartners) re: contract losses	0.8
10/10/2025	JL	Review business plan and projections	0.5
10/10/2025	JL	Provide comments on outstanding requests and priority of requests along with additional areas to address	0.3
10/10/2025	LL	Analyze September 2025 LTM third party spend data re: potential cost improvement opportunities	3.0
10/10/2025	LL	Prepare interim materials summarizing contact-center improvement levers and impact on cost structure post-implementation.	2.4
10/10/2025	LL	Research automation-driven call-deflection potential; estimated reduction in inbound volume and resulting FTE requirement changes.	2.6

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/10/2025	SC	Refine labor model to develop savings hypotheses as part of business plan workstream.	2.6
10/10/2025	TGP	Analyze the Debtors' historical financials	2.9
10/12/2025	CC	Assess competitor revenue outlook based on proxy statement	1.2
10/12/2025	CC	Review financial model assumptions re: key performance indicators	0.4
10/12/2025	CC	Review historical 10-Ks and filings for history, exposure, revenue trends, contract types	0.9
10/12/2025	CC	Review investor deck from May 2024 for business outlook	1.1
10/12/2025	CC	Review Moelis valuation for perspective on comparables and trends	0.7
10/13/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	2.6
10/13/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/13/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
10/13/2025	CC	Continue to review Moelis valuation for perspective on health care trends embedded into forecasts	0.9
10/13/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: planning on financial model	0.5
10/13/2025	CC	Review competitor transcripts for perspective on home care industry	0.4
10/13/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	JL	Prepare questions and discussion items for C. Shandler meeting	0.8
10/13/2025	JL	Prepare questions and discussion items for meeting with K. Shepard	1.3
10/13/2025	JL	Prepare questions and discussion items for meeting with S. Kern from Debtors	1.8
10/13/2025	LL	Analyze field operations structure to identify organizational design improvement initiatives.	1.8
10/13/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	LL	Prepare organizational effectiveness model for field operations estimating potential savings.	2.7

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10/13/2025	LL	Prepare interview questions re: NEMT business and projections for informal call with Ken Shepard (10/16).	2.5
10/13/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.6
10/13/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.7
10/13/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	SC	Refine labor model to develop savings hypotheses as part of business plan workstream.	2.6
10/13/2025	SC	Review materials for support of G&A workstream for business plan workstream, identifying cost savings opportunities, analyzing census materials, researching on health care industry and trends,	1.9
10/13/2025	TGP	Create model to analyze the Debtors' projections by business unit	2.7
10/13/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, review expenses, thesis	1.0
10/13/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: planning on financial model	0.5
10/13/2025	TGP	Update model to analyze the Debtors' projections by business unit based on analysis of the Debtors' costs	1.9
10/14/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	1.9
10/14/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.6
10/14/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
10/14/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	CC	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: initial review of financial model	0.3
10/14/2025	CC	Review ModivCare transcripts for historical perspective	1.4
10/14/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8

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10/14/2025	JL	Review model and files received from debtors for business plan/projections and note follow up requests needed or confirmation of understanding	1.5
10/14/2025	JL	Update tracker for this week's meetings with Debtor for business plan and projection items	1.3
10/14/2025	LL	Conduct research on state-by-state Medicaid PCS reimbursement structures; compiled rate schedules and recent CMS updates impacting core markets.	2.8
10/14/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	LL	Perform multivariate analysis quantifying correlation between state reimbursement trends and ModivCare revenue variance	3.0
10/14/2025	SC	Analyze materials provided by Debtor to formulate additional cost savings opportunities for Business Plan workstream	2.6
10/14/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	1.3
10/14/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	2.2
10/14/2025	SC	Review materials of support for additional cost opportunity within G&A for business plan workstream	2.9
10/14/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call to outline Q&A, expense review	1.8
10/14/2025	TGP	Participate in a call with T. Prince and C. Cuomo (AlixPartners) re: initial review of financial model	0.3
10/15/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	2.6
10/15/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.9
10/15/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.5
10/15/2025	CC	Begin to model framework for alternative case	1.2
10/15/2025	CC	Update financial model re: checks and income statement	1.6
10/15/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	CC	Research and send messages to A. Panda of AlixPartners re: margin outlook	0.4
10/15/2025	CC	Review management meeting questions in advance of meetings	0.6
10/15/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4

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10/15/2025	JL	Review files received from debtors on financial projections/ assumptions and notating additional requests	1.3
10/15/2025	JL	Review, edit and add items to questions and discussion items with debtors for business plan items and files received	1.4
10/15/2025	LL	Analyze cost and operations center labor cost structure to assess potential opportunities for cost improvement in the NEMT business unit.	2.5
10/15/2025	LL	Analyze labor and non-labor Cost of Goods Sold (COGS) structure based on new data provided by Debtor to refine working hypotheses	2.0
10/15/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	LL	Review state procurement and managed-care contract data to identify rate caps and recent competitive rebids affecting pricing assumptions	2.6
10/15/2025	SC	Analyze data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	1.9
10/15/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.9
10/15/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/15/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	2.5
10/15/2025	SC	Identify additional cost opportunities within G&A for business plan workstream	3.0
10/15/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expenses, Q&A	0.4
10/16/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	0.8
10/16/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.1
10/16/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
10/16/2025	CC	Begin to build out model checks across income statement	2.9
10/16/2025	CC	Continue to build out cases summary tab in financial model	3.0
10/16/2025	LL	Assess NEMT contact center call volume and cost per call and recalculate annual savings.	1.8
10/16/2025	LL	Research metrics (potential eligibility, average savings, industry practices) for rideshare as an alternative to traditional NEMT transportation for low-acuity and outpatient cases.	2.0
10/16/2025	LL	Review customer contracts to pinpoint specific contact center operations terms and service levels.	2.1
10/16/2025	SC	Analyze census data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	2.4
10/16/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	2.2
10/16/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	0.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/16/2025	SC	Research healthcare industry and trends, specifically bankruptcy precedents to support G&A workstream for business plan workstream	1.8
10/16/2025	SC	Review materials of support for additional cost opportunity within G&A for business plan workstream	2.1
10/17/2025	AP	Develop detailed questionnaire for Debor Management interviews re: Debtor's business plan and projections	1.3
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.7
10/17/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
10/17/2025	CC	Formulate questions in advance of call with C. Shandler of FTI	1.3
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	JL	Draft diligence questions for management re business plan	0.5
10/17/2025	LL	Analyze transport provider data to assess potential opportunities for cost improvement in the NEMT business unit.	2.5
10/17/2025	LL	Coordinate with valuation workstream to ensure revised operating projections flow through to enterprise-value sensitivity model.	1.8
10/17/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	LL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	LL	Update executive-summary slides highlighting cumulative transformation savings.	1.3
10/17/2025	SC	Analyze census data provided by Debtors to refine labor model and identify cost savings opportunities for business plan workstream	2.4
10/17/2025	SC	Create materials of support for additional cost opportunity within G&A for business plan workstream	2.1
10/17/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	0.8

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10/17/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/17/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: takeaways from CFO management meeting	0.7
10/17/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: report draft planning	0.5
10/19/2025	SC	Develop additional hypotheses for cost opportunity within G&A for business plan workstream	2.8
10/19/2025	SC	Research public company costs to support G&A workstream for business plan workstream	2.4
10/19/2025	SC	Review labor model and create materials to support hypotheses as part of business plan workstream.	2.9
10/20/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.1
10/20/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.6
10/20/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.1
10/20/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
10/20/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	CC	Review latest due diligence information download in data room re forecasts	0.6
10/20/2025	CC	Review ModivCare financials for historical perspective	0.7
10/20/2025	CC	Update ModivCare financial model for summary statistics	1.8
10/20/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	IN	Draft initial cost management hypotheses for third-party spend	1.2
10/20/2025	IN	Draft initial hypotheses for internal/ external labor cost reductions	1.8
10/20/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	IN	Review data room management presentations	0.6
10/20/2025	IN	Review documents in data room	1.8
10/20/2025	IN	Update Excel file for third-party spend	1.2
10/20/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	JL	Review and update business plan analysis	1.5

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10/20/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	LL	Analyze fragmented tail vendors to identify addressable vs. non-addressable spend for a potential savings initiative.	2.0
10/20/2025	LL	Analyze third party spend data to identify categories, top vendors and potential cost improvement opportunities.	3.0
10/20/2025	LL	Map branch operations and management HC to assess labor baseline and potential organizational improvement opportunities	1.4
10/20/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	SC	Analyze third party costs associated with G&A workstream for business plan workstream	1.5
10/20/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.6
10/20/2025	SC	Develop hypotheses for third party costs associated with G&A workstream for business plan workstream	1.8
10/20/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/20/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/20/2025	SC	Revise hypotheses for cost opportunity within G&A for business plan workstream	2.7
10/20/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Lee, J. Wang, T. Prince, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, expense analysis	1.6
10/21/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.3
10/21/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	1.4
10/21/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	1.6
10/21/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.7
10/21/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	GM	Conduct Business Plan and CapEx analysis	0.5
10/21/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	IN	Categorize CapEx projects to model savings	1.4
10/21/2025	IN	Create PowerPoint materials for CapEx categorization	2.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/21/2025	IN	Participate in a call with I. Nelson, S. Clark (AlixPartners) re: Technology Labor Spend	0.8
10/21/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	IN	Update CapEx cost optimization model	1.4
10/21/2025	IN	Update PowerPoint materials for CapEx with commentary	1.6
10/21/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	JL	Review and provide edits to revised business plan expert report	2.2
10/21/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review.	1.6
10/21/2025	LL	Analyze outsourced labor contracts for customer support to determine scope, contract structure, rates and other terms to identify potential overlap and cost improvement opportunities.	1.8
10/21/2025	LL	Analyze role titles, compensation and seniority levels to assess organizational design improvement opportunities	3.0
10/21/2025	LL	Map contact center roles for NEMT and PCS, both internal staff and contract labor, to assess total spend baseline	1.6
10/21/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review.	1.6
10/21/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/21/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/21/2025	SC	Participate in a call with I. Nelson, S. Clark (AlixPartners) re: Technology Labor Spend	0.8
10/21/2025	SC	Review materials for support of G&A workstream for business plan workstream	2.5
10/21/2025	SC	Revise hypotheses for cost opportunity within G&A for business plan workstream	2.7
10/21/2025	TGP	Analyze the Debtors' financial projections	2.1
10/21/2025	TGP	Participate in a call with A. Panda, G. Magrisi, J. Wang, T. Prince, I. Nelson, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: business plan call, initial deck review	1.6
10/22/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.9
10/22/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/22/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/22/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
10/22/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	GM	Conduct Business Plan and CapEx analysis	2.0
10/22/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	IN	Create PowerPoint materials for third-party spend savings	1.4
10/22/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	IN	Develop savings model in excel for third party spend	1.9
10/22/2025	IN	Define vendor classification and tail spend model	1.8
10/22/2025	IN	Update third party spend savings levers	1.7
10/22/2025	JW	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend	0.8
10/22/2025	JL	Provide comments to business plan analysis	2.0
10/22/2025	JL	Review projection model and quantify proposed changes	1.8
10/22/2025	LL	Analyze debtor's Mobility forecast to assess trip mix-shift trends by trip category, contract and payment structure.	3.0
10/22/2025	LL	Analyze rideshare spend data (TTM) to assess spend efficiency and potential to address cancellation fees spend.	2.5
10/22/2025	LL	Compared forecasted trip data with actuals for commercial transport providers, rideshare, mileage reimbursement and mass transit to understand rideshare adoption momentum.	1.7
10/22/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Wang, I. Nelson, L. Lovatto, and C. Cuomo (AlixPartners) re: capex and supplier spend.	0.8
10/22/2025	TGP	Analyze the Debtors' projected costs	1.2
10/23/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.3
10/23/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.7
10/23/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/23/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.8
10/23/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	DM	Review draft UHC contract comps for ModivCare contract termination 9019	0.6
10/23/2025	GM	Conduct Business Plan and CapEx analysis	2.0
10/23/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	IN	Define offshoring limits for labor model cost optimization	1.4
10/23/2025	IN	Develop labor model cost optimization role classification in Excel	1.3
10/23/2025	IN	Draft labor optimization PowerPoint slide	1.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/23/2025	IN	Labor model cost optimization model development	1.9
10/23/2025	IN	Update CapEx optimization PowerPoint slide	0.6
10/23/2025	IN	Update CapEx spend model assumptions in Excel	1.2
10/23/2025	IN	Update labor cost optimization PowerPoint slide	1.0
10/23/2025	JL	Provide comments to business plan analysis	1.4
10/23/2025	JL	Participate in a call with A. Panda, G. Magrisi, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	LL	Analyze PCS COGS and Opex GL data from 2023 to 2025 to assess profitability and staffing expenses by state.	3.0
10/23/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Levitt, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck.	0.4
10/23/2025	LL	Refine cost improvement levers for NEMT and PCS contact center operations, run-rate benefits and potential implementation roadmap.	2.8
10/23/2025	LL	Research cost to achieve re: service expense cost improvement initiatives.	1.8
10/23/2025	SC	Create presentation materials for G&A workstream in business plan review	2.4
10/23/2025	SC	Evaluation of potential cost savings opportunities	1.9
10/23/2025	SC	Analysis of census materials for business plan review	2.3
10/23/2025	SC	Research on health care industry trends	2.5
10/23/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.8
10/23/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: general workstream update on deck	0.4
10/23/2025	SC	Review materials in support of cost savings opportunities for business plan workstream	1.2
10/23/2025	TGP	Analyze the Debtors' projected revenue	0.8
10/24/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
10/24/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	1.9
10/24/2025	AP	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	AP	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.1
10/24/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.9
10/24/2025	CH	Review draft business plan materials	1.1
10/24/2025	CC	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	CC	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	DM	Review and provide comments on draft Magrisi expert report re: ModivCare business plan	4.3

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/24/2025	GM	Conduct Business Plan and CapEx analysis	4.0
10/24/2025	GM	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	GM	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	IN	Finalize Labor cost optimization PowerPoint materials	1.8
10/24/2025	IN	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	IN	Update CapEx optimization model	1.2
10/24/2025	IN	Update CapEx optimization PowerPoint slide	0.3
10/24/2025	IN	Update labor cost optimization model in Excel	1.7
10/24/2025	IN	Update labor optimization model in Excel	1.9
10/24/2025	JW	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	JA	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	JA	Review and provide comments on business plan report	1.0
10/24/2025	JL	Analyze EBITDA upside calculation	1.3
10/24/2025	JL	Provide comments on business plan report	1.8
10/24/2025	JL	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	JL	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	LL	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	LL	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report.	0.7
10/24/2025	LL	Refine contact center improvement opportunities based on expert interviews applied to ModivCare specific case.	1.5
10/24/2025	LL	Research PCS reimbursement rates from 2022 to 2024 for PA, NY, NJ, MA, CT, WV and FL to compare with ModivCare rates and trends.	2.8
10/24/2025	LL	Update report with baseline, findings, opportunity sizing, cost to achieve and timeline for run-rate savings.	2.8
10/24/2025	MDG	Review business plan report	0.9
10/24/2025	MR	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report.	0.7
10/24/2025	RK	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7

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10/24/2025	RK	Review draft business plan report.	2.6
10/24/2025	SC	Create presentation materials to quantify G&A savings	2.4
10/24/2025	SC	Review of cost savings opportunities and prioritize based on impact ability	2.6
10/24/2025	SC	Review of health care trends vs. Debtors proposed budget	2.8
10/24/2025	SC	Develop materials in support of cost savings opportunities for business plan workstream	2.9
10/24/2025	SC	Participate in a call with A. Panda, G. Magrisi, J. Lee, I. Nelson, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: edits to report	0.2
10/24/2025	SC	Participate in a call with G. Magrisi, J. Lee, J, Amico, A. Panda, M. Root, R. Komendowski, L. Lovatto, J. Wang, S. Clark, and C. Cuomo (AlixPartners) re: review draft of report	0.7
10/24/2025	SC	Review materials in support of cost savings opportunities for business plan workstream	0.7
10/25/2025	GM	Conduct Business Plan and CapEx analysis	0.5
10/26/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.5
10/26/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.4
10/26/2025	AP	Prepare draft outline and key sections of the AlixPartners business plan expert report	2.3
10/26/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.6
10/26/2025	GM	Conduct Business Plan and CapEx analysis	0.7
10/26/2025	SC	Create materials for support of G&A workstream for business plan workstream	2.7
10/26/2025	SC	Update slides for support of G&A workstream for business plan workstream	2.5
10/27/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.2
10/27/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/27/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.1
10/27/2025	AP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.1
10/27/2025	CC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	GM	Review Business Plan and CapEx analysis and materials	0.5
10/27/2025	IN	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	JA	Review and provide comments on business plan report	1.0
10/27/2025	JL	Participate in a call with A. Panda, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	JL	Perform research and analysis for inclusion in business plan/ projections report	2.2
10/27/2025	KBM	Review business plan updates	0.6
10/27/2025	LL	Assessed assumptions underlying rideshare adoption ramp; compared utilization rates forecast vs. actuals for 2025 Q1 and Q2.	2.7

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10/27/2025	LL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	LL	Review management analysis of transportation provider mix-shift; modeled financial impact of incremental Uber/Lyft penetration on cost-per-trip and gross margin.	2.0
10/27/2025	LL	Updated analysis, models and reports to account for revised total labor burden rate as supplied by Debtor and determine revised cost improvement opportunities.	3.0
10/27/2025	SC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: update call on business plan	0.3
10/27/2025	SC	Research employee compensation benchmarks and precedent in Chapter 11 companies.	2.1
10/27/2025	SC	Revise content for G&A workstream as part of business plan work	2.9
10/28/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.9
10/28/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.5
10/28/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.6
10/28/2025	AP	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.6
10/28/2025	CC	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	IN	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	JL	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	LL	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	LL	Prepare scenario model quantifying savings from transportation provider mix-shift under varying trip volumes and savings per trip estimates; summarized implications for base-case EBITDA.	2.5
10/28/2025	LL	Research Medicaid reimbursement rates and trends (2025-2028) for non-medical personal care services in CT, FL, MA, NJ, NY, PA and WV.	2.5
10/28/2025	LL	Review management's segment updates to evaluate service-level implications of increased Uber/Lyft usage; coordinated with operations SME.	2.7
10/28/2025	SC	Develop materials for expert report for G&A as part of business plan workstream	2.4
10/28/2025	SC	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/28/2025	SC	Research precedent on instances of companies changing employee comp while under Chapter 11	2.7
10/28/2025	SC	Revise content based on updated information from Debtor for business plan workstream	0.8

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10/28/2025	SC	Update labor model on new information provided by Debtor for business plan workstream	1.8
10/28/2025	TGP	Analyze the Debtors' business plan projections under various cost assumptions	1.4
10/28/2025	TGP	Participate in a call with J. Lee, I. Nelson, A. Panda, T. Prince, L. Lovatto, S. Clark, and C. Cuomo (AlixPartners) re: review of PCS	0.3
10/29/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.8
10/29/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.7
10/29/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/29/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	AP	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
10/29/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	GM	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	IN	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	JL	Follow up on outstanding items for business plan report and incorporate	1.8
10/29/2025	JL	Participate in a call with G. Magrisi, A. Panda, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	LL	Create model to compare PCS reimbursement rates according to Debtor's forecast, historical performance and market trends.	2.5
10/29/2025	LL	Draft memo summarizing organizational-design recommendations and quantified savings for inclusion in business-plan diligence report.	2.8
10/29/2025	LL	Integrate service expense initiatives into unified business-plan financial model; ensured consistency of savings phasing and one-time costs.ore sending to W&C for review.	2.2
10/29/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	LL	Participate in a call with G. Magrisi, A. Panda, L. Lovatto, A Thakur (AlixPartners) re: contact center analysis	0.2
10/29/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/29/2025	SC	Review content to ensure all values tie and align to updated information from Debtor for business plan workstream	2.2
10/29/2025	SC	Revise content based on updated information from Debtor for business plan workstream	2.9

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	SC	Update content based on new information from Debtor for business plan workstream	2.7
10/29/2025	TGP	Analyze the Debtors' business plan projections under various revenue assumptions	1.1
10/29/2025	TGP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: process coordination	0.3
10/30/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	1.2
10/30/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.2
10/30/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/30/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
10/30/2025	CC	Revise financial model to reflect business plan adjustments	1.4
10/30/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	GM	Review Business Plan and CapEx analysis and materials	1.0
10/30/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	JA	Review business plan evaluation materials and reconcile scenarios to Company plan	1.0
10/30/2025	JL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: alignment on revenue/contracts	0.2
10/30/2025	SC	Prepare back-up materials, re: G&A labor model and savings	2.6
10/30/2025	SC	Review content for expert report for business plan workstream	2.3
10/30/2025	TGP	Analyze the Debtors' business plan projections under various cost assumptions	1.8
10/31/2025	AP	Analyze EBITDA upside scenarios re: AlixPartners business plan expert report	2.7
10/31/2025	AP	Develop revenue-specific opportunity opinions re: AlixPartners business plan expert report	2.3
10/31/2025	AP	Update draft outline and key sections of the AlixPartners business plan expert report	2.9
10/31/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.1
10/31/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	GM	Review Business Plan and CapEx analysis and materials	1.0
10/31/2025	GM	Participate in a call with G. Magrisi, J. Lee (AlixPartners) re: edits to valuation reports	0.1

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/31/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	IN	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	JA	Provide comments on business plan expert report	0.8
10/31/2025	JL	Participate in a call with G. Magrisi, J. Lee (AlixPartners) re: edits to valuation reports	0.1
10/31/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	JL	Research and analysis on revenue items for business plan	1.5
10/31/2025	JL	Provide edits on business plan expert report	1.6
10/31/2025	KBM	Review updates related to draft business plan report	0.6
10/31/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	RK	Review business plan draft rebuttal report.	2.0
10/31/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
10/31/2025	SC	Revise content for expert report for business plan workstream	1.6
10/31/2025	TGP	Analyze the Debtors' business plan projections under various revenue assumptions	1.2
10/31/2025	TGP	Participate in a call with G. Magrisi, A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: edits to business plan report	0.4
Total Professional Hours			**803.6**

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	4.9	$	7,154.00
Kathryn B McGlynn	$1,415	1.2		1,698.00
Greg Magrisi	$1,250	24.1		30,125.00
Jerry Wang	$1,225	9.0		11,025.00
Johnny Lee	$1,225	45.0		55,125.00
Ashutosh Panda	$1,150	190.1		218,615.00
Joel Amico	$1,150	4.5		5,175.00
Iain Nelson	$1,120	41.7		46,704.00
Matthew D Gates	$1,120	0.9		1,008.00
Ryan Komendowski	$1,080	5.6		6,048.00
Matthew Root	$1,000	0.7		700.00
Thomas G Prince	$950	50.3		47,785.00
Christopher Cuomo	$910	45.5		41,405.00
Susan Clark	$910	207.3		188,643.00
Chase Hood	$850	1.1		935.00
Lucas Lovatto	$835	156.2		130,427.00
Francisco Carafi	$445	15.5		6,897.50
Total Professional Hours and Fees		**803.6**	**$**	**799,469.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	TGP	Analyze FTI's proposed retention	0.9
10/01/2025	TGP	Analyze Moelis' proposed retention	1.4
10/02/2025	TGP	Analyze FTI's proposed retention	0.4
10/02/2025	TGP	Analyze Moelis' proposed retention	0.7
10/06/2025	KBM	Review FTI retention application	0.6
10/06/2025	KBM	Review Moelis retention application	0.6
10/06/2025	KBM	Revise FTI and Moelis fee analysis	0.9
10/22/2025	KBM	Review information related to MIP analysis	0.3
Total Professional Hours			**5.8**

AlixPartners

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Denver, CO 80237

Re: Employee Compensation and Advisor Retention Matters
Code: 20015424PA0001.1.10

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	2.4	$	3,396.00
Thomas G Prince	$950	3.4		3,230.00
Total Professional Hours and Fees		**5.8**	**$**	**6,626.00**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JA	Provide comments on W&C declaration	0.8
10/01/2025	JA	Review various data room files and provide summary overview	0.8
10/01/2025	MDG	Set up analysis of unencumbered assets	2.0
10/01/2025	TGP	Analyze the Debtors' historical financials	1.8
10/01/2025	TGP	Analyze the Debtors' scheduled assets	2.1
10/02/2025	DM	Review ModivCare accounting practices	0.5
10/02/2025	JA	Analyze various financial information and DIP budget expenses	0.9
10/02/2025	JA	Review historical financial data and related cash flow and business plan detail	1.0
10/02/2025	JA	Review revised due diligence list and updated files in data room	0.7
10/02/2025	MDG	Review updates to diligence request list	2.4
10/03/2025	CH	Review new items uploaded to virtual data room	1.2
10/03/2025	CH	Review settlement with United Healthcare	0.5
10/03/2025	JA	Review debtors settlement proposal	0.3
10/03/2025	JA	Review various data room documents re prep for upcoming hearing and W&C requests	2.0
10/03/2025	MDG	Prepare analysis of unencumbered assets	2.0
10/03/2025	TGP	Analyze the Debtors' historical operations to draft descriptions for UCC presentation materials	2.3
10/03/2025	TGP	Analyze the Debtors' scheduled liabilities	2.1
10/04/2025	CC	Calculate trade spend and count analysis for J. Amico and D. MacGreevey (AlixPartners)	0.6
10/05/2025	CH	Correspondence with team re: document review and outstanding data requests	0.4
10/05/2025	CH	Review new production uploads for responsive documents	1.7
10/05/2025	MDG	Revise analysis of unencumbered assets	1.5
10/06/2025	JA	Analyze proposed creditor settlement and identify diligence requests	0.7
10/06/2025	JA	Review various documents produced from Debtors re up tier transaction and financial projections	1.4
10/06/2025	JA	Update to diligence tracker based on review of various data room files	0.8
10/06/2025	MDG	Review open items on diligence list	1.0
10/06/2025	TGP	Analyze documents provided through discovery	2.7
10/07/2025	JA	Provide comment on various W&C motions	0.8
10/07/2025	JA	Review court descriptions re diligence questions	1.2
10/07/2025	JA	Review diligence requests and update for revisions and materials received	1.5
10/07/2025	JA	Review vendor payment data and updated liquidity outlook	0.9
10/07/2025	MDG	Review docket for various debtor filings and determine response status	0.5
10/08/2025	JA	Analyze prepetition vendor payments	0.5
10/08/2025	JA	Review documents related to historical debtor transactions and develop diligence questions	1.5
10/08/2025	JA	Review historical financial information and developed view on unencumbered assets in response to W&C diligence	1.0
10/09/2025	CH	Review new documents uploaded to virtual dataroom related to prepetition sale process	1.3
10/09/2025	JA	Draft of various diligence questions and perform financial analysis re Q1 transactions	0.7

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JA	Review various documents produced per discovery re valuation and financial projections	1.3
10/09/2025	KBM	Review outstanding information requests and next steps	0.6
10/09/2025	MDG	Additional research for W&C team re: lien challenge questions	1.0
10/09/2025	MDG	Update diligence list	1.7
10/09/2025	MDG	Prepare for diligence call with FTI	0.5
10/09/2025	MDG	Review contracts in Datasite dataroom	1.0
10/10/2025	CC	Review 10-K for business background information	0.8
10/10/2025	JA	Analysis and provide comments on the waterfall and reconcile with Plan documents	1.3
10/10/2025	JA	Analyze year end liquidity and Q1 2026 working capital requirements	1.1
10/10/2025	JA	Review documents in data room and provided via production process; update diligence list	1.0
10/10/2025	JA	Review various ownership changes in Q1 2025 re uptier transaction	0.7
10/10/2025	JT	Prepare a workbook detailing ownership history of the company's debt	1.6
10/10/2025	MDG	Research bank accounts potentially under DACA for W&C	1.0
10/10/2025	MDG	Research contract summaries in business plan for W&C	1.0
10/13/2025	CH	Review latest relativity data production for responsive documents	1.3
10/13/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: Review NWC assumptions in the financial model	0.4
10/13/2025	JA	Draft of diligence questions for upcoming informal debtor interviews	1.0
10/13/2025	JA	Review various documents produced in Relativity	0.9
10/13/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: Review NWC assumptions in the financial model	0.4
10/13/2025	JT	Develop a calculation for the 1L make whole provision	1.4
10/13/2025	MDG	Research re: lien challenge workstream	1.0
10/13/2025	MDG	Review diligence request list and compare to information provided and outstanding	1.5
10/14/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: analysis of sources and uses detail	0.3
10/14/2025	JA	Prepare materials and diligence questions for informal Debtor interviews	1.2
10/14/2025	JA	Review historical diligence info re prior forecasts	0.5
10/14/2025	JA	Review open diligence request list and identify high priority request items	1.0
10/14/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: analysis of sources and uses detail	0.3
10/14/2025	JT	Develop an excel view of the liquidity bridge to the 8/20 DIP budget	0.8
10/15/2025	CH	Review C. Shandler declaration re: UCH settlement	0.3
10/15/2025	JA	Analyze Debtor's proposed settlement and provide comments	0.6
10/15/2025	JA	Analyze various cash and business plan model to determine risk and opportunities in estimated post effective date cash	1.3
10/15/2025	JA	Review background materials and draft of questions for upcoming Debtor interviews	1.2
10/15/2025	JA	Review business plan and valuation materials to determine follow up diligence questions	1.1
10/15/2025	JT	Develop diligence questions re: working capital changes in company projections	0.6

AlixPartners

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/15/2025	JT	Revise NWC analysis workbook based on additional detail received from Moelis	1.3
10/15/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
10/15/2025	MDG	Prepare information re: lien challenge and send to W&C	0.5
10/16/2025	CH	Review new documents uploaded to virtual dataroom related to liquidation analysis and historical cash flow budgets	1.7
10/16/2025	JA	Draft of various diligence questions for upcoming Debtor interviews	0.9
10/16/2025	JT	Develop a bridge of cash balances per the Sources and Uses to the Company's 3-statement model	0.9
10/16/2025	JT	Develop a bridge of cash balances per the Sources and Uses to the DIP Budget	1.3
10/17/2025	JA	Analyze certain Plan definitions and recovery calculations	1.3
10/17/2025	JA	Model out of various liquidity and valuation scenarios	1.6
10/17/2025	JT	Correspondence with V. Diwanji (Moelis) re: NWC diligence questions	0.4
10/17/2025	MDG	Research re: lien challenges	0.7
10/20/2025	CH	Review documents uploaded to virtual data room re: projections support and prepetition transactions	1.6
10/20/2025	JA	Analyze recoveries and claims estimated under various scenarios	1.2
10/20/2025	JA	Call with J. Amico and J. Tutty (AlixPartners) re: review of NWC projections	0.4
10/20/2025	JT	Analyze NWC projections from FY26-FY30 based on the company's 3-statement model	2.7
10/20/2025	JT	Call with J. Amico and J. Tutty (AlixPartners) re: review of NWC projections	0.4
10/20/2025	KBM	Review updates related to open information requests	0.3
10/20/2025	MDG	Review due diligence list and request status	0.5
10/21/2025	CC	Format worksheet for management incentive plan precedent deals	0.3
10/21/2025	CC	Research management incentive plan precedent deals	2.8
10/21/2025	CC	Research plan values and payment structures re management incentive plan precedent deals	1.2
10/21/2025	JA	Analyze certain settlement offers and impact on general unsecured creditors class	0.8
10/21/2025	JA	Analyze various claims recovery scenarios	0.7
10/21/2025	KBM	Review updates to outstanding information requests	0.2
10/21/2025	MDG	Research information related to lien challenges	3.0
10/22/2025	CC	Research management incentive plan precedent deals re: form and structure of consideration	1.8
10/22/2025	JA	Analyze proposed Debtor settlement with counter party	0.5
10/22/2025	KBM	Review updates re: unencumbered assets analysis	0.2
10/22/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
10/22/2025	TGP	Research re: prepetition transactions	1.8
10/23/2025	JA	Review open diligence items relating to liquidity and cash at effective date	1.6
10/23/2025	TGP	Research re: prepetition transactions	1.9
10/24/2025	CH	Research re: fixed asset appraisals	0.7
10/24/2025	CH	Review documents uploaded to virtual data room re: transportation agreements	1.2
10/24/2025	JA	Provide supporting analysis to W&C re projections	1.2
10/24/2025	JA	Review open diligence requests and prioritize re business plan and valuation	1.0
10/24/2025	MDG	Research re: W&C objection support	2.0
10/27/2025	CH	Review draft objection to UHC settlement	0.4

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Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	DM	Emails with R. Beil (W&C), J. Shapiro, D. Kiyosaki (FTI), M. Gates and J. Amico re: priority ModivCare diligence items	0.3
10/27/2025	JA	Analyze various diligence related to letters of credit	0.5
10/27/2025	JA	Review various business plan projections in 2025 and reconcile differences	1.6
10/27/2025	JA	Update to list of outstanding diligence questions	0.6
10/27/2025	JA	Prepare various diligence questions and responses per W&C request re upcoming hearing	0.5
10/27/2025	KBM	Review unencumbered analysis	0.4
10/27/2025	MDG	Revise and submit diligence requests	1.2
10/27/2025	MDG	Revise diligence list requests and submit to FTI	0.6
10/28/2025	DM	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	DM	Emails with attachments with J. Amico, J. Lee re: UHC contract negotiation practices	0.4
10/28/2025	JA	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	JA	Draft of open diligence request list; confirm updates in data room	1.0
10/28/2025	JA	Draft of updated workstream list for team call with proposed next steps and action items	0.5
10/28/2025	JL	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.3
10/28/2025	KN	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.2
10/28/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
10/28/2025	MDG	Further research related to lien challenge data requests	0.7
10/28/2025	RK	Discussion with D. MacGreevey, J. Amico, R. Komendowski, J. Lee and K. Nystrom (AlixPartners) re: letters of credit requirements	0.2
10/29/2025	CH	Review prepetition insider payment detailed breakout	0.7
10/29/2025	JA	Develop new model to perform scenario analysis on potential recovery scenarios for unsecured creditors	0.7
10/29/2025	JA	Review various historical documents re financial projections and LC projections re deposition prep	1.4
10/29/2025	JA	Update to diligence request list for new items and analyze new data room documents	1.0
10/29/2025	MDG	Further research related to lien challenge	0.6
10/30/2025	JA	Analyze various historical cash forecast per counsel request	0.5
10/30/2025	JA	Draft of diligence questions for upcoming Debtor depositions	1.0
10/30/2025	JA	Prepare talking points and outline for upcoming Committee call	0.5
10/30/2025	JA	Review various data room documents re letters of credit and surety bonds	0.7
10/31/2025	JA	Analyze various recovery scenarios based on revising assumptions on valuation and consideration options	0.8
10/31/2025	JA	Draft of questions re upcoming debtor depositions	0.9
10/31/2025	MDG	Review September payment matrices	0.8
Total Professional Hours			**136.8**

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Kevin Nystrom	$1,430	0.2		286.00
Kathryn B McGlynn	$1,415	1.7		2,405.50
Johnny Lee	$1,225	0.3		367.50
Joel Amico	$1,150	56.1		64,515.00
Matthew D Gates	$1,120	28.7		32,144.00
Ryan Komendowski	$1,080	0.2		216.00
John Tutty	$950	12.1		11,495.00
Thomas G Prince	$950	14.7		13,965.00
Christopher Cuomo	$910	7.5		6,825.00
Chase Hood	$850	13.0		11,050.00
Lisa Marie Bonito	$580	0.8		464.00
Total Professional Hours and Fees		**136.8**	**$**	**145,923.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
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Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/02/2025	JA	Review certain debtor motions including ordinary course professionals and provide comments	0.4
10/03/2025	JL	Review UHC settlement agreement and analysis of run rate vs settlement	0.9
10/07/2025	MDG	Prepare analysis of ordinary course professionals motion	2.5
10/08/2025	JA	Review and diligence of OCP motion and other debtor related retention applications	1.1
10/08/2025	KBM	Review analysis of ordinary course professionals motion	0.7
10/08/2025	KBM	Review ordinary course professionals motion	0.6
10/09/2025	JA	Review various diligence requests related to OCP motion	0.5
10/09/2025	KBM	Review additional information related to ordinary course professionals	0.6
10/22/2025	JL	Research and review UnitedHealthcare settlement items	1.8
10/23/2025	JL	Prepare research/analysis on UHC relationship	1.3
10/27/2025	DM	Review UCC objection to proposed UHC 9019 settlement	0.3
10/28/2025	JA	Review various materials and provide support to W&C for upcoming UHC hearing	0.5
10/28/2025	JL	Provide counsel with requested information to support UHC objection and hearing	0.9
10/29/2025	DM	Review ModivCare Debtors' reply to UCC objection to proposed UHC 9019 settlement	0.3
10/29/2025	DM	Review statement of consenting creditors re: W&C retention application	0.3
Total Professional Hours			**12.7**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Johnny Lee	$1,225	4.9		6,002.50
Joel Amico	$1,150	2.5		2,875.00
Matthew D Gates	$1,120	2.5		2,800.00
Total Professional Hours and Fees		**12.7**	**$**	**15,680.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	RK	Review document production for valuation and investigation documents.	2.0
10/04/2025	RK	Analyze latest document production.	2.6
10/05/2025	RK	Analyze latest document production.	1.0
10/07/2025	CH	Review collateral review memo and exhibits prepared by W&C	0.9
10/07/2025	CR	Call with R. Komendowski, C. Rubel (AlixPartners) and C. West, A. Chase, L. Miranda, A. Hong (W&C) re: uptier transaction investigation.	0.5
10/07/2025	CR	Analyze public financial statements related to uptier transactions.	1.8
10/07/2025	RK	Call with R. Komendowski, C. Rubel (AlixPartners) and C. West, A. Chase, L. Miranda, A. Hong (W&C) re: uptier transaction investigation.	0.5
10/08/2025	CH	Analysis re: retention bonus payments	0.7
10/08/2025	CH	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	CR	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of documents related to uptiering transactions	0.7
10/08/2025	CR	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	CR	Review financial statements and other docs related to uptier transactions.	1.5
10/08/2025	JA	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	JT	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of documents related to uptiering transactions	0.7
10/08/2025	JT	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	JT	Review key documents identified by counsel connected to uptier transaction	2.8
10/08/2025	JT	Summarize the contents of key documents identified by counsel as part of uptier transaction review	2.6
10/08/2025	MDG	Research answers re: lien challenge questions	2.5
10/08/2025	RK	Meeting with C. Rubel, J. Amico, R. Komendowski, C. Hood, and J. Tutty (AlixPartners) re: review of uptiering transactions	0.3
10/08/2025	RK	Review production for historical solvency analysis.	2.8
10/08/2025	RK	Review production for uptier transaction investigation.	2.0
10/09/2025	CH	Analyze documents produced re: uptier transaction	1.8
10/09/2025	CH	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	CH	Research related to collateral review supporting documents	0.5
10/09/2025	CR	Call with A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of company debt transactions in 2025	0.4
10/09/2025	CR	Call with C. Rubel and J. Tutty (AlixPartners) re: review of incremental term loan and uptier agreements	0.5
10/09/2025	CR	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	CR	Analyze documents related to debt swap transactions in Q1.	2.1
10/09/2025	JA	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4

AlixPartners

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	JT	Call with A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of company debt transactions in 2025	0.4
10/09/2025	JT	Call with C. Rubel and J. Tutty (AlixPartners) re: review of incremental term loan and uptier agreements	0.5
10/09/2025	JT	Create a slide to summarize the holders of second lien notes	0.7
10/09/2025	JT	Develop a summary of lien holder parties and balances held	1.1
10/09/2025	JT	Develop slides to explain the total uptier balance	0.8
10/09/2025	JT	Develop slides with excerpts from relevant agreements to explain the uptier transaction	2.9
10/09/2025	JT	Meeting with C. Hood, J. Amico, C. Rubel, and J. Tutty (AlixPartners) re: diligence of company debt transactions in 2025	0.4
10/09/2025	JT	Review Company 8-K filings in 2025 that are related to debt transactions	0.8
10/10/2025	CR	Prepare flow of funds analysis related to debt swap transactions.	1.8
10/10/2025	CR	Meeting with L. Miranda and A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of 2025 debt uptier transaction	0.3
10/10/2025	JT	Meeting with L. Miranda and A. Chase (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of 2025 debt uptier transaction	0.3
10/10/2025	JT	Refine slide deck on uptier transaction based on new information received from counsel	2.1
10/10/2025	JT	Refine the slide deck to explain the uptier transaction, incorporating key excerpts from relevant agreements	2.9
10/13/2025	CR	Prepare flow of funds analysis related to debt swap transactions in Q1.	1.7
10/13/2025	CR	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of supporting documents related to the uptier transaction	0.6
10/13/2025	CR	Review dataroom materials related to debt agreements.	1.8
10/13/2025	CR	Review uptier transaction slides.	1.3
10/13/2025	JT	Meeting with C. Rubel and J. Tutty (AlixPartners) re: review of supporting documents related to the uptier transaction	0.6
10/13/2025	JT	Perform searches for documents in Relativity to support the uptier transaction review	2.1
10/13/2025	JT	Review debt documents for detail on uptier transaction	1.6
10/14/2025	CR	Analyze pre-petition debt transactions.	1.8
10/15/2025	CR	Analyze pre petition debt transactions.	1.3
10/15/2025	CR	Call with A. Chase and L. Miranda (W&C), C. Rubel and J. Tutty (AlixPartners) re: review of fifth amendment to term loan agreement	0.3
10/15/2025	JT	Analyze debt issuance costs associated with the incremental term loan	0.8
10/15/2025	JT	Call with A. Chase and L. Miranda (W&C), C. Rubel and J. Tutty (AlixPartners) re: review of fifth amendment to term loan agreement	0.3
10/15/2025	JT	Correspondence w/ L. Miranda and A. Chase (W&C) re: uptier transaction	0.3
10/15/2025	JT	Review sources and uses workbook from the incremental term loan transaction	0.4
10/16/2025	CR	Analyze pre-petition debt transactions.	1.2
10/16/2025	JT	Refine notes from call with S. Kern (ModivCare)	0.5
10/17/2025	CH	Review counsel update re: lien investigation workstream	0.4
10/17/2025	CR	Analyze pre-petition debt swap transactions.	1.8

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	JT	Perform document searches re: the unsecured bondholders who participated in the exchange agreement as part of the uptier transaction	1.8
10/20/2025	CR	Analyze pre-petition debt swap transaction materials.	1.2
10/21/2025	JT	Review data from Bloomberg re: ownership changes in the company's debt	1.3
10/21/2025	JT	Review key documents identified by counsel re: uptier transaction	1.9
10/22/2025	CR	Review produced documents related to debt swap transactions.	1.0
10/22/2025	JT	Compared Bloomberg trading data to files provided by the company re: debt ownership as of March 31	0.7
10/23/2025	JT	Develop requests for the company re: uptier transaction	0.3
10/23/2025	JT	Refine presentation to summarize our understanding of the uptier transaction	0.7
10/23/2025	JT	Review key documents identified by counsel re: debt agreements entered into in 2025	2.7
10/23/2025	JT	Review responses from the company re: diligence questions on debt transactions in 2025	0.6
10/28/2025	JL	Attend deposition of C. Shandler related to UHC motion	1.2
10/28/2025	JL	Continue attendance remotely, deposition of C. Shandler related to UHC motion	1.1
10/29/2025	CR	Discussion with A. Chase, L. Miranda and C. West (W&C) re: complaint.	0.6
10/29/2025	JT	Draft follow up questions for the company re: 2025 debt transactions	0.8
10/29/2025	JT	Summarize documents identified by counsel re: uptier transaction review	2.4
10/30/2025	JT	Develop a matrix of the company's historical debt holders based on additional documents provided by the company	2.7
10/31/2025	JT	Analyze intercreditor agreement re: detail on the uptier transaction	1.8
Total Professional Hours			**90.2**

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
Christopher Rubel	$1,225	24.9	$	30,502.50
Johnny Lee	$1,225	2.3		2,817.50
Joel Amico	$1,150	0.7		805.00
Matthew D Gates	$1,120	2.5		2,800.00
Ryan Komendowski	$1,080	11.2		12,096.00
John Tutty	$950	43.6		41,420.00
Chase Hood	$850	5.0		4,250.00
Total Professional Hours and Fees		**90.2**	**$**	**94,691.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	CH	Initial review of claims register received from Verita	1.7
10/07/2025	CH	Analyze filed claims to remove duplicative, amended, settled, and withdrawn claims from claim estimate	2.4
10/07/2025	CH	Call with T. Prince and C. Hood (AlixPartners) re: claims analysis	0.4
10/07/2025	KBM	Review information related to filed claims	0.6
10/07/2025	TGP	Call with T. Prince and C. Hood (AlixPartners) re: claims analysis	0.4
10/08/2025	CH	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/08/2025	CH	Continue to analyze filed claims to remove duplicative, amended, settled, and withdrawn claims from claim estimate	2.7
10/08/2025	CH	Continue to reconcile prepetition payment detail with scheduled and filed claims	1.8
10/08/2025	CH	Reconcile prepetition payment detail with scheduled and filed claims	2.1
10/08/2025	HO	Revise discrepancies between names in vendor payments list and claims list	3.6
10/08/2025	MDG	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/08/2025	TGP	Analyze the Debtors' claims register	0.8
10/08/2025	TGP	Call with M. Gates, C. Hood, T. Prince (AlixPartners) re: analysis of the Debtors' claims register	0.2
10/09/2025	MDG	Review claims register	0.7
10/10/2025	MDG	Input data into AlixPartners claims platform to analyze claims	0.5
10/10/2025	MDG	Review claims register file	1.0
10/13/2025	MDG	Analyze claims register	1.5
10/15/2025	CH	Analyze revised lease rejection claims analysis	0.3
10/16/2025	CH	Performed analysis of filed and scheduled claims	0.3
10/17/2025	MDG	Analyze claims data	1.8
10/20/2025	JA	Analyze general unsecured creditors claims estimate	0.8
10/20/2025	SL	Begin preparing the claims module for claim reconciliation process	1.7
10/20/2025	SL	Review of various filed claims	0.3
10/20/2025	SL	Review latest claims report and begin formatting for the claims module	1.6
10/20/2025	SL	Review latest entity level information and prepare updates to the claims module accordingly	1.3
10/21/2025	KBM	Review illustrative recovery analysis	0.4
10/21/2025	MDG	Analyze claims file and prepare summary reports	1.4
10/21/2025	MDG	Analyze claims register and prepare summary reports	0.2
10/21/2025	SL	Continue to prepare updates to the latest claims register to begin uploading to the module for the claims reconciliation process	1.8
10/21/2025	SL	Review claims agent categorization and update records accordingly	1.6
10/21/2025	SL	Review scheduled claim detail provided in the claims register and update claims module accordingly	1.3
10/22/2025	CH	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/22/2025	CH	Correspondence with claims agent re: claims register data	0.2
10/22/2025	JA	Analyze unsecured claims pool	0.5
10/22/2025	MDG	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2

AlixPartners

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Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/22/2025	SL	Begin review of scheduled claims trumped by filed and update the claims module accordingly	1.7
10/22/2025	SL	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/22/2025	SL	Review filed claim detail provided in the claims register and update the claims module accordingly	2.1
10/22/2025	TGP	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	CH	Analyze claims filings to remove duplicative, redundant and amended claims from estimated claims pool	2.8
10/23/2025	CH	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	CH	Continue to analyze claims filings to remove duplicative, redundant and amended claims from estimated claims pool	1.7
10/23/2025	JA	Analyze general unsecured creditors claims pool	1.0
10/23/2025	MDG	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	MDG	Review claim form images	2.0
10/23/2025	SL	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/23/2025	SL	Continue to review latest updates on the claim register and ensure updates captured accordingly on the claims module	1.3
10/23/2025	SL	Prepare report of filed and schedule claim comparison for further review and validation	0.9
10/23/2025	SL	Prepare report of filed and schedule claim comparison for further review and validation	1.8
10/24/2025	CH	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis	0.2
10/24/2025	CH	Draft claims reconciliation analysis re: duplicative, amended and redundant claims	2.4
10/24/2025	MDG	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/24/2025	SL	Call with M. Gates, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/24/2025	SL	Continue to review latest claims register for duplicated, amended and redundant claims	1.9
10/24/2025	SL	Prepare filed claims report for review for duplication, amendments and redundant claims	2.1
10/27/2025	CH	Analyze claims register to match filed and scheduled claims for estimated claims pool	2.4
10/27/2025	CH	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2
10/27/2025	CH	Continue to analyze claims register to match filed and scheduled claims for estimated claims pool	2.1
10/27/2025	MDG	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2
10/27/2025	SL	Participate in call with M. Gates, C. Hood and S. Lemack (AlixPartners) re: claims analysis	0.2

AlixPartners

ModivCare Inc., et al.
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Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/27/2025	SL	Continue to review latest review of filed claims for potential duplication and update tracker accordingly	1.8
10/27/2025	SL	Finalize review of filed claim duplication/amendment feedback, and prepare updates to the claims report accordingly	1.4
10/28/2025	CH	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	DM	Review ModivCare Debtors' high level general unsecured creditors claims analysis	0.4
10/28/2025	JA	Review Debtor claims analysis and reconcile against filed claims data	1.1
10/28/2025	MDG	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	MDG	Review claims forms	1.5
10/28/2025	SL	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/28/2025	SL	Continue to finalize updates to the latest scheduled vs. filed claim detail and ensure updates are captured accordingly in latest reports	1.5
10/28/2025	SL	Finalize updates to the schedule claim detail on the claims module and ensure reports reflect updates accordingly	1.4
10/28/2025	SL	Review latest input provided on the claims module and ensure updates are reflected accordingly in latest reports	1.7
10/28/2025	TGP	Call with M. Gates, T. Prince, C. Hood, and S. Lemack (AlixPartners) re: claims output analysis	0.4
10/29/2025	CH	Analyze illustrative general unsecured claims analysis and related assumptions prepared by FTI	0.9
10/29/2025	CH	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	CH	Draft analysis re: estimated scheduled and filed administrative claims	0.6
10/29/2025	CH	Draft analysis re: estimated scheduled and filed general unsecured claims and claims by type	1.7
10/29/2025	CH	Draft analysis re: estimated scheduled and filed priority claims	0.5
10/29/2025	CH	Draft analysis re: estimated scheduled and filed secured claims	0.7
10/29/2025	CH	Draft illustrative general unsecured claims estimate	1.2
10/29/2025	KBM	Review UHC settlement agreement	0.9
10/29/2025	KBM	Review updated unsecured recovery analysis	0.6
10/29/2025	MDG	Analyze filed claims	0.1
10/29/2025	MDG	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	MDG	Review claims and selected claim forms	1.8
10/29/2025	SL	Begin preparing updated claim summary reporting package for upcoming claims presentation	1.4
10/29/2025	SL	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/29/2025	TGP	Call with M. Gates, T. Prince, S. Lemack, and C. Hood (AlixPartners) re: claims analysis update	0.2
10/30/2025	CH	Review individual claims filings for further detail in support of claims analysis	2.7

AlixPartners

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Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/30/2025	KBM	Review objection to UHC settlement	0.7
10/30/2025	KBM	Review updates re: UHC settlement approval	0.4
10/30/2025	MDG	Review claims presentation and selected claims	2.4
10/30/2025	SL	Continue to finalize updates to the claim summary report and ensure latest feedback incorporated into claims presentation	2.2
10/30/2025	SL	Continue to finalize updates to the latest scheduled vs. filed claim detail and ensure updates are captured accordingly in latest reports	1.4
10/30/2025	SL	Finalize remaining claim updates in the claims module and update claims presentation with final changes for review and sign-off	1.7
10/31/2025	CH	Analysis re: lease rejection claims	0.9
10/31/2025	CH	Draft updates to claims analysis to incorporate comments from M. Gates (AlixPartners)	1.2
10/31/2025	CH	Review schedule of assumed executory contracts and leases and related cure costs	0.7
10/31/2025	MDG	Correspondence with D. MacGreevey (AlixPartners) re: claims	0.2
10/31/2025	MDG	Review claims presentation and provide comments	1.6
Total Professional Hours			**104.8**

AlixPartners

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Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.4	$	584.00
Kathryn B McGlynn	$1,415	3.6		5,094.00
Joel Amico	$1,150	3.4		3,910.00
Matthew D Gates	$1,120	18.3		20,496.00
Sam Lemack	$980	37.3		36,554.00
Thomas G Prince	$950	2.2		2,090.00
Chase Hood	$850	36.0		30,600.00
Hugh Olohan	$535	3.6		1,926.00
Total Professional Hours and Fees		**104.8**	**$**	**101,254.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
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Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JM	Draft valuation report.	2.4
10/01/2025	JM	Review ModivCare earnings call transcripts.	2.7
10/01/2025	MR	Perform analysis of valuation materials in the ModivCare Disclosure Statement.	0.4
10/01/2025	RK	Review documents produced for valuation analysis.	2.0
10/02/2025	JM	Draft valuation report.	3.0
10/02/2025	JM	Research NEMT industry.	2.4
10/02/2025	JM	Review ModivCare investor presentations.	2.8
10/02/2025	MR	Perform analysis of segment-level financial data for ModivCare valuation analysis.	2.3
10/02/2025	RK	Review historical board minutes produced for EBITDA adjustments.	2.9
10/03/2025	JM	Draft valuation report.	2.4
10/03/2025	JM	Research personal care industry.	2.6
10/03/2025	JM	Review uptier transaction.	2.3
10/03/2025	MB	Conduct valuation analysis	2.1
10/03/2025	MR	Prepare draft presentation for ModivCare valuation.	1.2
10/05/2025	MR	Analyze valuation calculations in Moelis Illustrative Alternate Transaction Scenario Analysis document.	0.8
10/06/2025	JM	Respond to review comments on valuation report.	2.2
10/06/2025	JM	Review dataroom for information on National MedTrans transaction.	1.5
10/06/2025	JM	Review earnings calls transcripts for guideline companies.	2.6
10/06/2025	MB	Review valuation data	0.7
10/06/2025	MR	Review diligence tracker and responses for ModivCare valuation materials.	0.8
10/06/2025	RK	Analyze latest document production for historical solvency review.	1.4
10/06/2025	RK	Review January projections for historical solvency review.	2.1
10/07/2025	JA	Review various Debtor provided materials related to q1 transactions	1.0
10/07/2025	JM	Respond to review comments on valuation report.	1.6
10/07/2025	JM	Searched dataroom for results of Deutsche Bank sales process.	2.4
10/07/2025	MB	Review ModivCare financial documents	0.9
10/07/2025	MR	Prepare analysis of ModivCare guideline company multiples over time.	1.3
10/07/2025	MR	Prepare draft presentation for ModivCare valuation.	2.7
10/07/2025	RK	Analyze latest document production for historical solvency review.	1.7
10/07/2025	RK	Review discount rate inputs for valuation analysis.	2.4
10/07/2025	RK	Review the disclosure statement for waterfall analysis.	1.8
10/08/2025	CR	Analyze solvency implications of first quarter debt swap transactions.	1.3
10/08/2025	CR	Draft valuation expert report.	1.4
10/08/2025	JM	Update precedent transaction analysis.	2.6
10/08/2025	JM	Update valuation analysis.	3.0
10/08/2025	MR	Perform analysis of ModivCare financial metrics for valuation analysis.	1.7
10/08/2025	RK	Document review and analysis for valuation workstreams.	3.0
10/08/2025	RK	Prepare historical solvency review.	1.4
10/09/2025	CH	Analysis re: amended plan recovery mechanics	0.7
10/09/2025	CR	Assessed solvency in connection with pre petition debt swap transactions.	0.9
10/09/2025	JM	Analyze comparable company bond prices.	1.4
10/09/2025	JM	Review dataroom for information on Matrix transaction.	2.7
10/09/2025	MR	Perform guideline company analysis for draft ModivCare valuation.	1.9

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	RK	Prepare company valuation analysis.	2.2
10/09/2025	RK	Review document production for business plan assumption support.	1.9
10/09/2025	RK	Review public transaction multiples for valuation analysis.	2.6
10/10/2025	CH	Draft analysis re: recovery hurdle amounts	0.8
10/10/2025	CH	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	CC	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: alignment on valuation methodology	0.3
10/10/2025	CR	Assessed solvency in connection with debt swap transactions.	1.9
10/10/2025	CR	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	DM	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JA	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JT	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	JM	Update valuation report.	2.7
10/10/2025	MB	Review ModivCare financial data	1.2
10/10/2025	MR	Prepare draft presentation for ModivCare valuation.	2.6
10/10/2025	MR	Review guideline company filings and analyst reports for ModivCare valuation analysis.	0.9
10/10/2025	RK	Attend meeting with D. MacGreevey, C. Rubel, R. Komendowski, J. Amico, C. Hood, and J. Tutty (AlixPartners); A. Zatz, A. Chase, J. Zakia, and others (W&C) re: Modivcare valuation and waterfall	0.5
10/10/2025	RK	Participate in a call with R. Komendowski and C. Cuomo (AlixPartners) re: alignment on valuation methodology	0.3
10/10/2025	RK	Prepare valuation analyses for multiple periods in 2025.	3.0
10/10/2025	RK	Review documents produced for historical solvency analysis.	2.4
10/12/2025	MR	Review valuation analysis in Moelis discussion materials.	0.6
10/12/2025	RK	Review the Moelis valuation analysis.	2.0
10/13/2025	CH	Analyze valuation materials prepared by Moelis	1.8
10/13/2025	CR	Draft valuation report slides.	1.3
10/13/2025	CR	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	JA	Review Debtors valuation analysis	1.0
10/13/2025	JT	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	JM	Review Moelis valuation report.	2.0

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10/13/2025	MR	Analyze guideline company valuation multiples over time for ModivCare valuation.	2.9
10/13/2025	MR	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report.	1.0
10/13/2025	MR	Perform research re: guideline company segment data for ModivCare valuation.	0.8
10/13/2025	MR	Perform research re: ModivCare NEMT segment for valuation analysis.	1.9
10/13/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	2.1
10/13/2025	RK	Meeting with R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: analysis of Moelis valuation report	1.0
10/13/2025	RK	Analyzed Moelis valuation report for rebuttal	2.0
10/13/2025	RK	Prepare uptier solvency analysis.	1.8
10/14/2025	CR	Analyze balance sheet solvency in connection with pre petition debt swap transactions.	1.8
10/14/2025	CR	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/14/2025	CR	Review market trading data.	1.2
10/14/2025	JT	Analyze comparable transactions identified by the company to support its valuation	2.1
10/14/2025	JT	Call with R. Komendowski and J. Tutty (AlixPartners) re: review of comparable transactions for company valuation	0.5
10/14/2025	JT	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/14/2025	JT	Develop slides in valuation presentation re: comparable transactions	1.6
10/14/2025	JT	Research additional comparable companies as part of the valuation developed by the UCC	1.1
10/14/2025	RK	Call with R. Komendowski and J. Tutty (AlixPartners) re: review of comparable transactions for company valuation	0.5
10/14/2025	RK	Review plan updated plan documentation for valuation analysis updates.	1.3
10/14/2025	RK	Call with R. Komendowski, C. Rubel, and J. Tutty (AlixPartners) re: comparable transactions for valuation analysis	0.4
10/15/2025	CR	Prepare valuation analysis related to proposed plan negotiations.	2.1
10/15/2025	CR	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	JA	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	JT	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	JT	Refine analysis of comparable transactions to support UCC company valuation	1.7
10/15/2025	JT	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	MB	Review ModivCare valuation	0.9
10/15/2025	MB	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/15/2025	MR	Perform quality review of cost of capital analysis for ModivCare valuation.	2.0
10/15/2025	MR	Perform reconciliation of Moelis valuation analysis.	2.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/15/2025	MR	Review cost of debt benchmarks for ModivCare cost of capital analysis.	0.9
10/15/2025	MR	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation.	1.3
10/15/2025	RK	Call with R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: company projections for cash and NWC	0.7
10/15/2025	RK	Review company business plan for NWC assumptions.	2.2
10/15/2025	RK	Working session with M. Brown, R. Komendowski, M. Root, C. Rubel, and J. Tutty (AlixPartners) re: presentation on company valuation	1.3
10/16/2025	CR	Review valuation slide deck.	0.8
10/16/2025	JT	Review available documents for historical actual and projected EBITDA results by business segment	1.6
10/16/2025	JT	Summarize historical actual and projected EBITDA results by business segment based on documents and SEC filings reviewed	1.4
10/16/2025	MR	Analyze discounted cash flow analysis in Moelis valuation materials.	2.0
10/16/2025	MR	Perform guideline transaction approach for ModivCare valuation.	2.5
10/16/2025	MR	Prepare valuation sensitivity analysis for Moelis cost of capital.	2.8
10/16/2025	MR	Reconcile Moelis cost of capital data against available market data.	1.8
10/16/2025	RK	Prepare valuation questions for Company interviews.	3.0
10/16/2025	RK	Review documents provided by Company for valuation and solvency analysis.	1.5
10/17/2025	AP	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CH	Review expert report of Z. Jamal	1.4
10/17/2025	CC	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CR	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	JA	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	JT	Refine analysis of changes to the company's EBITDA projections by business segment over time	1.1
10/17/2025	JT	Review available documents for historical and future projected Capital Expenditures	1.9
10/17/2025	JT	Review detail on company Letters of Credit	0.7
10/17/2025	JT	Review presentation on company valuation prepared by Moelis	0.5
10/17/2025	JT	Summarize the company's prior actual and projected liquidity balances from available documents	0.8
10/17/2025	JL	Participate in a call with R. Komendowski, J. Amico, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/17/2025	LL	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	MB	Review valuation data	0.7
10/17/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	MR	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	MR	Perform quality review of ModivCare valuation model.	1.6
10/17/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	MR	Research re: market debt yields for ModivCare valuation analysis.	0.8
10/17/2025	RK	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/17/2025	RK	Prepare valuation scenario analysis for settlement meeting.	2.1
10/17/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.0
10/17/2025	SC	Participate in a call with R. Komendowski, J. Amico, J. Lee, C. Rubel, M. Root, S. Clark, A. Panda, L. Lovatto, and C. Cuomo (AlixPartners) re: assumptions of valuation and EBITDA	1.2
10/18/2025	MR	Perform research re: transportation guideline companies in Moelis valuation materials.	1.3
10/19/2025	DM	Review settlement deck and provide edits	0.2
10/19/2025	JA	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	JT	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	KBM	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	MDG	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2
10/19/2025	MR	Analyze impact of equity rights offering in Moelis valuation materials.	2.6
10/19/2025	MR	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement.	0.2
10/19/2025	MR	Perform quality review of updated ModivCare valuation analysis.	1.1
10/19/2025	RK	Call with E. Feld, D. Litz (W&C); K. McGlynn, M. Root, R. Komendowski, M. Gates, J. Amico, and J. Tutty (AlixPartners) re: discussion of company valuation under amended disclosure statement	0.2

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/19/2025	RK	Prepare valuation analysis for upcoming committee meetings.	2.0
10/20/2025	CH	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	CH	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	CH	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	CH	Draft hurdle analysis and demonstrative for settlement discussion materials	1.3
10/20/2025	CH	Draft updates to W&C settlement materials	0.9
10/20/2025	CH	Review draft settlement discussion materials	1.1
10/20/2025	CR	Analyze comparable companies based on business plan and Moelis valuation.	2.3
10/20/2025	CR	Analyze Moelis valuation materials.	1.5
10/20/2025	JA	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	JA	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	JA	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	JT	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	JT	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	JT	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	MB	Review and provide comments on current valuation report	0.6
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation.	0.4
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation.	0.3
10/20/2025	MR	Review supporting documents provided by Moelis re: ModivCare valuation analysis.	1.7
10/20/2025	MR	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4
10/20/2025	RK	Call with J. Amico, C. Hood, R. Komendowski, and J. Tutty (AlixPartners) re: slides on company valuation in preparation for UCC meetings	0.6
10/20/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation deck based on comments received	0.4
10/20/2025	RK	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.3
10/20/2025	RK	Call with M. Root, C. Hood, R. Komendowski, J. Amico, and J. Tutty (AlixPartners) re: presentation on company valuation	0.4

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10/20/2025	RK	Prepare company valuation adjustments for settlement meeting discussion.	2.6
10/20/2025	RK	Prepare settlement analysis for meeting.	1.6
10/20/2025	RK	Update recovery waterfall analysis for updated distributable value assumptions.	2.0
10/20/2025	TGP	Analyze expert report of Z. Jamal	1.4
10/21/2025	CH	Analyze Moelis illustrative recovery analysis and related assumptions	0.5
10/21/2025	CH	Draft updates to settlement materials	0.8
10/21/2025	CR	Analyze Moelis valuation materials.	1.7
10/21/2025	CR	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	DM	Analyze Z. Jamal (Moelis) expert report re: ModivCare Plan valuation	1.2
10/21/2025	DM	Review Debtors projections over time in 2025	0.9
10/21/2025	JA	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/21/2025	JT	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/21/2025	MR	Analyze market data in Moelis valuation materials.	0.8
10/21/2025	RK	Call with J. Amico, C. Rubel, R. Komendowski, and J. Tutty (AlixPartners) re: build-out of slides to discuss settlement proposal	0.3
10/21/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: revisions to company valuation slides in advance of committee meeting	0.4
10/22/2025	CR	Analyze settlement offer economics.	1.5
10/22/2025	CR	Draft and reviewed valuation expert report.	1.5
10/22/2025	JT	Review waterfall in valuation model for alignment with latest settlement offer	1.1
10/22/2025	JT	Revise calculation for general unsecured creditors pool based on latest available information	0.7
10/22/2025	JT	Revise valuation model based on the latest settlement discussions	0.8
10/22/2025	MB	Review data for valuation analysis	0.8
10/22/2025	MR	Perform analysis of betas in Moelis valuation materials.	1.1
10/23/2025	CH	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	CR	Review market research materials related to plan valuation.	1.8
10/23/2025	CR	Review valuation expert report.	1.5
10/23/2025	JA	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	JT	Analyze statement of cash flows included in the company's 3-statement model from FY26-FY30	1.4
10/23/2025	MB	Conduct valuation analysis	1.1
10/23/2025	MDG	Call with J. Amico, M. Gates, R. Komendowski, and C. Hood (AlixPartners) re: allocation of value by entity	0.2
10/23/2025	MR	Prepare presentation materials for ModivCare valuation.	2.6
10/23/2025	RK	Call with V. Sachdev (W&C) re: valuation waterfall implications.	0.3

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10/23/2025	RK	Review business plan analysis for valuation impacts.	2.0
10/24/2025	CH	Review equity rights offering valuation support provided by Moelis	0.4
10/24/2025	CR	Review sec. 552 valuation cases per counsel request.	1.3
10/24/2025	CR	Review valuation expert report deck.	1.7
10/24/2025	MB	Conduct valuation analysis	0.8
10/24/2025	MR	Perform research re: guideline transaction method for ModivCare valuation analysis.	2.5
10/24/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	1.5
10/24/2025	RK	Implement business plan adjustments into the valuation analysis.	1.9
10/24/2025	RK	Investigation into Moelis option valuation methodology.	2.6
10/25/2025	RK	Prepare draft expert rebuttal valuation report.	2.9
10/25/2025	RK	Review expert rebuttal report guideline company selection analysis.	0.9
10/26/2025	MR	Perform research re: precedent transactions analysis for ModivCare valuation.	2.1
10/27/2025	CR	Draft valuation expert report.	1.2
10/27/2025	CR	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	CR	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/27/2025	DM	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	JA	Review Debtors and Alix's valuation analyses and reconcile differences	1.1
10/27/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	MB	Conduct valuation analysis	1.2
10/27/2025	MB	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	MR	Perform research re: precedent transactions analysis for ModivCare valuation.	2.8
10/27/2025	MR	Perform research re: selected publicly traded companies for ModivCare valuation.	0.8
10/27/2025	MR	Update ModivCare valuation slides in draft expert report.	2.3
10/27/2025	MR	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/27/2025	RK	Prepare the draft expert rebuttal valuation report.	2.6
10/27/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, C. Rubel and J. Amico (AlixPartners) re: treatment of ModivCare LC's	0.4
10/27/2025	RK	Discussion with M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.2
10/28/2025	CH	Review latest proposal received from ad hoc group	0.4
10/28/2025	CR	Analyze valuation indicia in connection with first quarter financing transactions.	1.8
10/28/2025	JL	Review business valuation analysis and report	1.1
10/28/2025	MB	Review valuation analysis	2.8
10/28/2025	MR	Analyze beta for selected publicly traded companies for ModivCare valuation.	1.6
10/28/2025	MR	Perform analysis of historical ModivCare market data for valuation analysis.	2.7
10/28/2025	RK	Prepare the draft expert rebuttal valuation report.	2.6
10/28/2025	RK	Review the Zul Jamal expert valuation report.	2.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/29/2025	CR	Review and provide comments on valuation expert report.	1.9
10/29/2025	JA	Review and provide comments on current draft of valuation report	0.7
10/29/2025	JL	Participate in discussion with M. Brown, J. Lee (AlixPartners) re: valuation report matters	0.5
10/29/2025	MB	Participate in discussion with M. Brown, J. Lee (AlixPartners) re: valuation report matters	0.5
10/29/2025	MB	Review business plan analysis	1.1
10/29/2025	MB	Review valuation analysis	1.9
10/29/2025	MR	Analyze ModivCare cost of capital for valuation analysis.	2.9
10/29/2025	MR	Update ModivCare discounted cash flow analysis to reflect revised business plan.	2.5
10/29/2025	MR	Update ModivCare valuation analysis in draft expert report.	1.4
10/29/2025	RK	Incorporation of adjusted business plan impact on valuation rebuttal.	2.6
10/29/2025	RK	Prepare the draft expert rebuttal valuation report.	2.3
10/29/2025	RK	Review the Zul Jamal expert valuation report.	1.1
10/30/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	JT	Call with M. Root and J. Tutty (AlixPartners) re: pricing of comparable debt instruments	0.4
10/30/2025	JT	Call with R. Komendowski and J. Tutty (AlixPartners) re: historical trading data of the company's debt	0.4
10/30/2025	JT	Review data on Bloomberg re: historical pricing and volume of the company's debt	1.7
10/30/2025	JT	Summarize data from Bloomberg re: historical debt pricing of comparable companies	1.4
10/30/2025	MB	Conduct valuation analysis	1.6
10/30/2025	MB	Review draft valuation report	1.8
10/30/2025	MB	Review valuation research	0.7
10/30/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	MR	Call with M. Root and J. Tutty (AlixPartners) re: pricing of comparable debt instruments	0.4
10/30/2025	MR	Perform analysis of debt securities for ModivCare valuation analysis.	1.9
10/30/2025	MR	Prepare ModivCare valuation materials for draft expert report.	1.6
10/30/2025	MR	Review EY valuation materials for ModivCare.	1.1
10/30/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	RK	Call with R. Komendowski and J. Tutty (AlixPartners) re: historical trading data of the company's debt	0.4
10/30/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation presentation	1.8
10/30/2025	TGP	Analyze the Debtors' valuation analysis	1.7
10/31/2025	DM	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	DM	Review and provide comments on draft Brown ModivCare valuation report	3.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/31/2025	JA	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
10/31/2025	JA	Review valuation analysis and provide comments	0.5
10/31/2025	JA	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	JT	Analyze FY26 net working capital projections based on additional detail provided by FTI	2.3
10/31/2025	JT	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
10/31/2025	JT	Correspond with J. Baltaytis (FTI) re: Operating Net Working Capital in FY26	0.4
10/31/2025	JT	Review the expert valuation report	0.3
10/31/2025	KBM	Review updates related to valuation report	0.6
10/31/2025	MB	Review valuation analysis	1.6
10/31/2025	MR	Perform analysis of market data for ModivCare valuation analysis.	0.9
10/31/2025	MR	Perform quality review of discounted cash flow analysis for ModivCare valuation.	2.0
10/31/2025	MR	Perform quality review of precedent transaction analysis for ModivCare valuation.	2.7
10/31/2025	MR	Prepare presentation materials for ModivCare valuation analysis.	2.0
10/31/2025	RK	Finalize draft rebuttal report for valuation analysis.	2.5
10/31/2025	RK	Attend meeting with D. MacGreevey, J. Amico and R. Komendowski (AlixPartners) re: ModivCare valuation issues	0.5
10/31/2025	RK	Call with J. Amico, R. Komendowski, and J. Tutty (AlixPartners) re: net working capital analysis	0.6
Total Professional Hours			**383.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	7.4	$	10,804.00
Kathryn B McGlynn	$1,415	0.8		1,132.00
Marc Brown	$1,415	27.5		38,912.50
Christopher Rubel	$1,225	41.5		50,837.50
Johnny Lee	$1,225	2.8		3,430.00
Ashutosh Panda	$1,150	1.2		1,380.00
Joel Amico	$1,150	10.6		12,190.00
Matthew D Gates	$1,120	0.4		448.00
Ryan Komendowski	$1,080	96.2		103,896.00
Matthew Root	$1,000	97.8		97,800.00
John Tutty	$950	33.0		31,350.00
Thomas G Prince	$950	3.1		2,945.00
Christopher Cuomo	$910	1.5		1,365.00
Jyoji Morimoto	$910	45.3		41,223.00
Susan Clark	$910	1.2		1,092.00
Chase Hood	$850	12.1		10,285.00
Lucas Lovatto	$835	1.2		1,002.00
Total Professional Hours and Fees		**383.6**	**$**	**410,092.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	CH	Review draft disclosure statement objection	1.1
10/01/2025	JA	Provide comments to Disclosure Statement	1.2
10/01/2025	KBM	Review analyses re: disclosure statement objection	0.7
10/01/2025	KBM	Review updates re: disclosure statement objection	0.6
10/01/2025	MDG	Draft of follow up diligence items re: ERO	0.6
10/01/2025	MDG	Correspondence with W&C re: ERO	0.3
10/01/2025	MDG	Review equity rights offering calculations for disclosure statement objection	1.4
10/02/2025	KBM	Review disclosure statement objection	0.9
10/03/2025	CH	Review redline of amended plan of reorganization	0.6
10/05/2025	CH	Review summary from counsel re: amended plan and disclosure statement	0.5
10/06/2025	CH	Review Debtors' response to disclosure statement objection	0.4
10/13/2025	JA	Review Amended Disclosure Statement and Plan re recovery	0.5
10/20/2025	KBM	Review updated settlement discussion presentation	0.8
10/21/2025	CH	Analyze disclosure statements and confirmation orders for key terms re: comparable management incentive plans	2.7
10/21/2025	CH	Continue to analyze disclosure statements and confirmation orders for key terms re: comparable management incentive plans	2.3
10/21/2025	CH	Prepare management incentive plan comps template	0.8
10/21/2025	CH	Screen for potential management incentive plan comps	0.9
10/21/2025	KBM	Review changes to settlement discussion presentation	0.6
10/21/2025	KBM	Review updates to settlement discussion presentation	0.9
10/21/2025	TGP	Analyze the Debtors' proposed plan	1.3
10/22/2025	CH	Draft updates to management incentive plan comps analysis	1.6
10/22/2025	KBM	Review Debtors' presentation re: settlement negotiations	0.7
10/22/2025	KBM	Review final changes to settlement discussion presentation	0.6
Total Professional Hours			**22.0**

AlixPartners

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Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	5.8	$	8,207.00
Joel Amico	$1,150	1.7		1,955.00
Matthew D Gates	$1,120	2.3		2,576.00
Thomas G Prince	$950	1.3		1,235.00
Chase Hood	$850	10.9		9,265.00
Total Professional Hours and Fees		**22.0**	**$**	**23,238.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/03/2025	CH	Attend second day DIP hearing (remotely)	0.5
10/03/2025	JA	Attend DIP hearing	0.5
10/03/2025	KBM	Attend second day DIP hearing (remotely)	0.5
10/03/2025	MDG	Attend second day DIP hearing (remotely)	0.5
10/06/2025	AP	Attend Disclosure Statement Hearing re: Debtor's DIP order and business plan projections	1.5
10/06/2025	CH	Attend Disclosure Statement hearing (remotely)	1.2
10/06/2025	JA	Attend Disclosure Statement hearing (remotely)	1.0
10/06/2025	KBM	Attend Disclosure Statement hearing (remotely)	1.2
10/06/2025	MDG	Attend Disclosure Statement hearing (remotely)	0.8
10/10/2025	AP	Attend Status Conference re: Debtor's DIP and Disclosure statement hearing	0.5
10/10/2025	CH	Attend ModivCare status conference (remotely)	0.5
10/10/2025	DM	Attend ModivCare status conference (remotely)	0.5
10/10/2025	KBM	Attend ModivCare status conference (remotely)	0.5
10/30/2025	CH	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	2.4
10/30/2025	DM	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely)	2.6
10/30/2025	JL	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	2.7
10/30/2025	KBM	Attend hearing re: ModivCare/ UHC 9019 settlement (remotely	1.0
Total Professional Hours			**18.4**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.1	$	4,526.00
Kathryn B McGlynn	$1,415	3.2		4,528.00
Johnny Lee	$1,225	2.7		3,307.50
Ashutosh Panda	$1,150	2.0		2,300.00
Joel Amico	$1,150	1.5		1,725.00
Matthew D Gates	$1,120	1.3		1,456.00
Chase Hood	$850	4.6		3,910.00
Total Professional Hours and Fees		**18.4**	**$**	**21,752.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	JB	Draft disclosures to be included in retention documents for parties beginning with Veri-Za	0.9
10/02/2025	BF	Revise draft AlixPartners' retention documents	0.6
10/02/2025	KSM	Review updated draft retention documents from G. Zahiremami (W&C)	0.6
10/03/2025	KSM	Correspondence with G. Zahiremami (W& C) and B. Filler (AlixPartners) re: finalizing retention documents	0.4
10/06/2025	BF	Revise draft retention documents	0.6
10/06/2025	DM	Review, revise and comment on draft ModivCare retention documents	1.0
10/06/2025	JB	Update draft disclosures to be included in retention documents in response to comments from K. Sundt McClarren (AlixPartners)	0.7
10/06/2025	KSM	Revise draft relationship disclosures	1.1
10/09/2025	BF	Draft investor solicitation emails re: disclosures	0.8
10/09/2025	BF	Prepare revised proposed retention order incorporating U.S. Trustee comments	0.4
10/09/2025	ESK	Emails to investors re: disclosures	1.0
10/09/2025	JB	Draft Firmwide document re. disclosures	2.8
10/09/2025	JB	Continue to draft Firmwide document re. disclosures	2.2
10/09/2025	KSM	Review comments from UST re: AlixPartners' retention application	0.5
10/10/2025	ESK	Review responses to disclosure emails	0.5
10/10/2025	JB	Continue to draft firmwide document re. disclosures	1.9
10/10/2025	JB	Draft supplemental disclosures to be included in First Declaration	0.7
10/14/2025	KSM	Revise firmwide email distribution re: potential additional relationship disclosures	1.3
10/15/2025	ESK	Review firmwide email re: disclosures	1.5
10/21/2025	ESK	Review investor disclosure response	0.5
10/21/2025	KSM	Address responses to firmwide correspondence re: potential relationship disclosures	0.4
10/28/2025	KSM	Revise draft supplemental declaration re: disclosures	0.3
10/29/2025	DM	Review draft first supplemental declaration iso ModivCare retention	0.3
10/29/2025	JB	Update draft supplemental disclosures to be included in First Declaration	0.3
Total Professional Hours			**21.3**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.3	$	1,898.00
Elizabeth S Kardos	$950	3.5		3,325.00
Kaitlyn Sundt McClarren	$715	4.6		3,289.00
Brooke Filler	$605	2.4		1,452.00
Jennifer Braverman	$565	9.5		5,367.50
Total Professional Hours and Fees		**21.3**	**$**	**15,331.50**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/12/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	0.8
10/13/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.0
10/13/2025	LMB	Review Interim Compensation Motion	0.2
10/15/2025	LMB	Continue to prepare professional fees for September 2025 Monthly Fee Statement	1.3
10/15/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	3.2
10/20/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	3.0
10/20/2025	MDG	Begin review September professional fees for privilege and confidentiality	1.5
10/21/2025	LMB	Prepare draft of initial First Monthly Fee Statement	0.7
10/21/2025	LMB	Prepare initial schedule/exhibit workbook for Monthly Fee Statements	1.0
10/23/2025	MDG	Review September professional fees for privilege and confidentiality	2.3
10/27/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	2.3
10/27/2025	MDG	Review September professional fees for privilege and confidentiality	1.0
10/28/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.2
10/28/2025	MDG	Analyze professional fees for September 2025 Monthly Fee Statement for privilege and confidentiality	1.0
10/29/2025	LMB	Analyze expenses for September 2025 Monthly Fee Statement	0.7
10/30/2025	LMB	Prepare professional fees for September 2025 Monthly Fee Statement	1.3
10/30/2025	LMB	Prepare schedule/exhibit workbook for September 2025 Monthly Fee Statement	1.2
10/30/2025	MDG	Analyze professional fees for September 2025 Monthly Fee Statement for privilege and confidentiality	0.8
Total Professional Hours			**24.5**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
Matthew D Gates	$1,120	6.6	$	7,392.00
Lisa Marie Bonito	$580	17.9		10,382.00
Total Professional Hours and Fees		**24.5**	**$**	**17,774.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/09/2025	CH	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	CC	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	JA	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/09/2025	RK	Call with J. Amico, R. Komendowksi, C. Cuomo, and C. Hood (AlixPartners) re: waterfall recovery analysis assumptions	0.4
10/10/2025	CH	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	DM	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	JA	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/10/2025	RK	Attend meeting with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) re: ModivCare waterfall analysis	0.7
10/11/2025	RK	Prepare waterfall analysis.	2.1
10/12/2025	RK	Review waterfall analysis sensitivity to valuation analysis.	2.3
10/13/2025	RK	Review the Moelis plan waterfall analysis.	2.4
10/14/2025	RK	Prepare model plan waterfall assumption analysis.	2.3
10/14/2025	RK	Prepare waterfall scenario analysis for counsel.	2.8
10/15/2025	RK	Review business plan documentation for waterfall assumption updates.	1.8
10/16/2025	RK	Prepare valuation analysis waterfall impacts for settlement meeting.	2.9
10/17/2025	RK	Prepare waterfall scenario analysis for settlement meeting.	1.9
10/17/2025	RK	Review plan documentation for waterfall sensitivity analysis.	1.5
10/18/2025	RK	Prepare waterfall scenario analysis for settlement meeting.	1.2
10/19/2025	RK	Prepare waterfall analysis for upcoming committee meetings.	2.1
10/23/2025	RK	Review documents available for entity-level value allocation analysis.	2.2
10/27/2025	RK	Review warrant and ERO value impacts on the waterfall.	1.4
10/29/2025	RK	Review ERO valuation impacts.	1.1
10/30/2025	RK	Analyze plan dilution schedules and impact on distributable value among classes.	2.2
10/30/2025	RK	Review letter of credit impact on distributable value.	2.7
Total Professional Hours			**37.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.7	$	1,022.00
Joel Amico	$1,150	1.1		1,265.00
Ryan Komendowski	$1,080	34.0		36,720.00
Christopher Cuomo	$910	0.4		364.00
Chase Hood	$850	1.1		935.00
Total Professional Hours and Fees		**37.3**	**$**	**40,306.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
10/01/2025	DM	Travel from Houston to New York, NY (return from ModivCare DIP hearing)	7.0
10/21/2025	RK	Travel from Chicago, IL to New York (to attend settlement discussions)	3.5
10/22/2025	RK	Travel from New York, NY to Chicago, IL (return from settlement discussions)	3.5
Total Professional Hours			**14.0**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	7.0	$	10,220.00
Ryan Komendowski	$1,080	7.0		7,560.00
Total Professional Hours and Fees		**14.0**	**$**	**17,780.00**
Less 50% Travel Fees				(8,890.00)
Total Professional Fees			**$**	**8,890.00**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
09/16/2025	S&P Research Reports	1,210.10
09/19/2025	S&P Research Reports – September 2025	150.00
09/22/2025	Industry Research - ModivCare	893.53
10/01/2025	Airfare David MacGreevey 2025-10-01 IAH- LGA	449.00
10/01/2025	S&P Research Reports – October 2025	320.00
10/01/2025	Taxi/Car Service David MacGreevey LGA airport to Home	307.35
10/01/2025	Taxi/Car Service David MacGreevey IAH airport to Hotel	143.45
10/20/2025	Airfare Ryan Komendowski 2025-10-21 ORD- LGA	382.96
10/21/2025	Airfare Joel Amico 2025-10-21 BUF- LGA	173.72
10/21/2025	Taxi/Car Service Joel Amico Home to Buffalo airport	11.33
10/21/2025	Taxi/Car Service Joel Amico Home to Buffalo airport	62.53
10/21/2025	Taxi/Car Service Joel Amico LGA to AlixPartners office	73.26
10/21/2025	Lodging Joel Amico - Westin New York Grand Central Station, New York, NY 2025-10-21 2025-10-23 (2 nights)	1,500.00
10/21/2025	Lodging Ryan Komendowski - The Benjamin Royal Sonest - New York, NY 2025-10-21 2025-10-23 (2 nights)	1,500.00
10/21/2025	Individual Meal - Joel Amico - Breakfast	3.58
10/21/2025	Individual Meal - Ryan Komendowski - Breakfast	8.72
10/21/2025	Individual Meal - Ryan Komendowski - Lunch	8.18
10/21/2025	Individual Meal - Ryan Komendowski - Dinner	75.00
10/22/2025	Parking/Tolls Ryan Komendowski	94.27
10/22/2025	Taxi/Car Service Ryan Komendowski LGA to Hotel	82.77
10/22/2025	Individual Meal - Joel Amico - Dinner	39.90
10/23/2025	Airfare Joel Amico 2025-10-24 LGA- BUF	208.71
10/23/2025	Taxi/Car Service Ryan Komendowski Hotel to LGA	127.73
10/23/2025	Individual Meal - Joel Amico - Dinner	16.06
10/24/2025	Taxi/Car Service Joel Amico Buffalo Airport to Home	70.72

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
10/24/2025	Taxi/Car Service Joel Amico Office to LGA	51.07
10/28/2025	Individual Meal - David MacGreevey - Lunch	18.23
10/31/2025	Client Research - US Home Care Services Market Outlook	2,000.00
10/31/2025	Client Research - US Remote Patient Monitoring Market Outlook	4,950.00
10/31/2025	Client Research - US Non-Emergency Medical Transportation Market to 2031	2,450.00
Total Expenses		**17,382.17**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20014495Pa0001

Expenses		**Amount**
Airfare	$	1,214.39
Client Research		11,973.63
Ground Transportation		1,024.48
Lodging		3,000.00
Meals		169.67
Total Expenses	**USD**	**17,382.17**

Exhibit C

Third Monthly Fee Statement
November 1, 2025 through November 30, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: January 2, 2026 @ 4:00 p.m. (CT)

THIRD MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	11/1/2025	11/30/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$1,042,772.60 (80% of $1,303,465.75)	
Total expenses requested in this Fee Statement:	$5,121.11	
Total fees and expenses requested in this Fee Statement:	$1,047,893.71	
Blended hourly rate for professionals:	$1,111.70	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

2590309251218000000002592 0004

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	80.9	$ 118,114.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	26.6	37,639.00
Marc Brown	Partner & Managing Director	$1,415	63.9	90,418.50
Greg Magrisi	Partner & Managing Director	$1,250	84.5	105,625.00
Christopher Rubel	Partner	$1,225	88.7	108,657.50
Johnny Lee	Partner	$1,225	31.1	38,097.50
Elizabeth S Kardos	Partner	$950	8.5	8,075.00
Ashutosh Panda	Director	$1,150	161.7	185,955.00
Joel Amico	Director	$1,150	123.1	141,565.00
Iain Nelson	Director	$1,120	0.3	336.00
Matthew D Gates	Director	$1,120	18.1	20,272.00
Ryan Komendowski	Director	$1,080	114.3	123,444.00
Matthew Root	Director	$1,000	63.2	63,200.00
Matthew Wicker	Director	$1,000	1.5	1,500.00
Kaitlyn Sundt McClarren	Director	$715	0.7	500.50
John Tutty	Senior Vice President	$950	31.2	29,640.00
Thomas G Prince	Senior Vice President	$950	30.3	28,785.00
Christopher Cuomo	Senior Vice President	$910	8.8	8,008.00
Susan Clark	Senior Vice President	$910	84.5	76,895.00
Chase Hood	Senior Vice President	$850	70.0	59,500.00
Claire Allshouse	Vice President	$810	14.6	11,826.00
Lucas Lovatto	Vice President	$835	44.5	37,157.50
Lisa Marie Bonito	Vice President	$580	21.0	12,180.00
Total Hours and Fees for Professionals			**1,172.5**	**$ 1,307,690.50**
Less: 50% Travel Fees				(4,224.75)
Total Fees for Professionals				**$ 1,303,465.75**
Less: 20% Holdback				(260,693.15)
Total Fees for Professionals Less Holdback				**$ 1,042,772.60**
		Average Billing Rate		**$ 1,111.70**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	26.3	$ 30,620.00
1.2	Meetings & Communication with UCC and Creditors	72.8	89,607.00
1.3	Prepare Committee Presentations	29.0	32,334.50
1.5	Mediation and Settlement Communications	1.1	1,147.00
1.7	Liquidity and Cash Management	17.3	17,097.00
1.9	Business and Strategic Plan	346.2	368,358.50
1.11	Financial and Other Diligence	89.6	96,935.00
1.12	Other Motions and Related Objections	13.0	15,043.00
1.13	Litigation Support & Investigations	259.5	314,830.50
1.14	Claims Analysis	33.5	33,005.50
1.15	Valuation and Solvency Analysis	222.6	251,382.50
1.17	RSA, Disclosure Statement & Plan of Reorganization	23.5	25,888.00
1.19	Retention Application & Relationship Disclosures	1.3	1,244.50
1.20	Fee Applications & Fee Statements	23.0	14,888.00
1.22	Intercompany & Waterfall Analysis	6.8	6,860.00
1.31	Travel Time	7.0	4,224.75
	Total Hours and Fees By Matter Category Before Holdback	**1,172.5**	**$ 1,303,465.75**

Average Billing Rate $ 1,111.70

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
NOVEMBER 1, 2025 THROUGH NOVEMBER 30, 2025

Expense Category	Amount
Airfare	$ 778.54
Ground Transportation	828.57
Lodging	3,000.00
Meals	514.00
Total Expenses	**$ 5,121.11**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this third monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from November 1, 2025 through November 30, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $1,303,465.75 and reimbursement of out-of-pocket expenses in the amount of $5,121.11 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $1,042,772.60 (80% of $1,303,465.75) and 100% of out-of-pocket expenses in the amount of $5,121.11 for a total amount of $1,047,893.71; and (iii) such other and further relief as this Court deems proper.

Dated: December 18, 2025

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	KBM	Review case updates and next steps	0.4
11/04/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	CC	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	DM	Review agenda for internal meeting re: ModivCare work plan and strategy	0.2
11/04/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	JA	Draft agenda items and workstream updates tracker for discussion with team	1.0
11/04/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	MDG	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/04/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, J. Amico, M. Gates, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince, C. Cuomo (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.8
11/06/2025	CH	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/11/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/11/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	DM	Review agenda for internal discussion re: ModivCare work plan and strategy	0.2
11/11/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	JA	Draft key workstreams for upcoming diligence areas re depositions and outstanding diligence requests	0.6
11/11/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/11/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.7
11/18/2025	AP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	CR	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	DM	Review agenda for internal discussion re: ModivCare work plan and strategy	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	JA	Draft key workstream tracker and identify of update to priority deliverables	0.5
11/18/2025	JL	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.5
11/18/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/18/2025	TGP	Call with D. MacGreevey, K. McGlynn, J. Lee, C. Rubel, J. Amico, C. Hood, R. Komendowski, G. Magrisi, A. Panda, T. Prince (AlixPartners) re: ModivCare work plan and strategy	0.6
11/28/2025	JA	Update to workplan for key milestones and prepare summary	1.0
Total Professional Hours			**26.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.7	$	3,942.00
Kathryn B McGlynn	$1,415	2.4		3,396.00
Greg Magrisi	$1,250	2.1		2,625.00
Christopher Rubel	$1,225	1.3		1,592.50
Johnny Lee	$1,225	2.1		2,572.50
Ashutosh Panda	$1,150	2.1		2,415.00
Joel Amico	$1,150	5.2		5,980.00
Matthew D Gates	$1,120	0.8		896.00
Ryan Komendowski	$1,080	2.1		2,268.00
Thomas G Prince	$950	2.1		1,995.00
Christopher Cuomo	$910	0.8		728.00
Chase Hood	$850	2.6		2,210.00
Total Professional Hours and Fees		**26.3**	**$**	**30,620.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/04/2025	AP	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	CC	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	CR	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	DM	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	DM	Review emails with attachment from D. Litz, C. Shore (W&C), J. Amico re: ModivCare insurance policy renewals.	0.4
11/04/2025	GM	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	JA	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	JL	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.8
11/04/2025	MB	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/04/2025	RK	Attend meeting with D. MacGreevey, G. Magrisi, A. Panda, J. Amico, M. Brown, C. Rubel, R. Komendowksi, J. Lee and C. Cuomo (AlixPartners), C. Shore, J. Zakia, A. Zatz, E. Smith (W&C) re: expert reports	0.9
11/05/2025	DM	Attend discussion with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, G. Magrisi (AlixPartners) re: expert report	0.5
11/05/2025	DM	Attend discussion with D. Rowe (Jupiter), C. Shore, S. Greissman, A. Zatz (W&C) re: ModivCare strategy	0.5
11/05/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare LC's analysis	0.3
11/05/2025	DM	Emails with A. Zatz, E. Smith (W&C), J. Amico and J. Lee re: ModivCare claims analysis	0.3
11/05/2025	GM	Attend discussion with C. Shore, J. Zakia, A. Zatz (W&C), D. MacGreevey, G. Magrisi (AlixPartners) re: expert report	0.5
11/06/2025	AP	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	AP	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	CH	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	CH	Review update from counsel re: deposition summaries	0.4
11/06/2025	DM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	DM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	DM	Review email from A. Chase re: summary and analysis of Gutierrez deposition	0.2
11/06/2025	GM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	GM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	JA	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	JA	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	JL	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	KBM	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	KBM	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	MDG	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	MDG	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/06/2025	RK	Attend meeting with D. MacGreevey, K. McGlynn, J. Lee, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	1.0
11/06/2025	MDG	Attend call with D. MacGreevey, K. McGlynn, G. Magrisi, M. Gates, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), C. Shore, S. Greissman, A. Zatz (W&C) re: preparation for upcoming UCC meeting	0.5
11/07/2025	CR	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	DM	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	DM	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	DM	Emails with C. Shore and E. Smith (W&C) re: Magrisi report	0.3
11/07/2025	DM	Review email with attachment from A. Hong (W&C) re: summary and analysis of Kern deposition	0.2
11/07/2025	GM	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	GM	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	JA	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	JL	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/07/2025	KBM	Review case updates from Committee Counsel	0.6
11/07/2025	MB	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	RK	Attend discussion with J. Zakia (W&C), D. MacGreevey, M. Brown, J. Amico, J. Lee and R. Komendowski (AlixPartners) re: ModivCare LC analysis and Brown report	0.5
11/08/2025	DM	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	DM	Emails with attachments with E. Smith (W&C), J. Amico and A. Panda re: ModivCare projections	0.6
11/08/2025	DM	Emails with attachments with E. Smith (W&C), R. Komendowski, G. Magrisi re: ModivCare projection's discrepancies	0.5
11/10/2025	DM	Review Magrisi report re: revenue opportunities	0.3
11/10/2025	DM	Discussion with J. Zakia (W&C) re: Magrisi report	0.2
11/11/2025	AP	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	DM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	DM	Discussion with S. Greissman (W&C) re: ModivCare uptier complaint	0.2
11/11/2025	DM	Review email with attachment from L. Miranda (W&C) re: D. Silvers report	0.6
11/11/2025	GM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	JA	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	JL	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	KBM	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/11/2025	RK	Attend meeting with C. Shore, A. Zatz, E. Smith (W&C), D. MacGreevey, A. Panda, G. Magrisi, J. Amico, J. Lee, R. Komendowski and K. McGlynn (AlixPartners) re: ModivCare upcoming meeting with the Committee, work plan and strategy	0.7
11/12/2025	DM	Emails with attachment with J. Zakia (W&C), D. MacGreevey, G. Magrisi, E. Kardos and R. Komendowski re: ModivCare expert report reliance materials	0.7

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/12/2025	DM	Emails with S. Greissman (W&C) re: analysis of market for LME's from 2020 to 2025	0.4
11/12/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/12/2025	KBM	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/12/2025	KBM	Review case updates from Committee Counsel and next steps	0.6
11/13/2025	AP	Participate in a call with G. Magrisi, A. Panda (AlixPartners) and Jason Zakia (W&C) re: business plan expert rebuttal report deposition	2.0
11/13/2025	CH	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	DM	Attend discussion with A. Zatz, A. Chase, L. Miranda (W&C) re: ModivCare uptier analysis	0.6
11/13/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	DM	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/13/2025	DM	Prepare talking points and issues list re: work plan and strategy for calls with ModivCare UCC and W&C	0.7
11/13/2025	GM	Participate in a call with G. Magrisi, A. Panda (AlixPartners) and Jason Zakia (W&C) re: business plan expert rebuttal report deposition	2.0
11/13/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, C. Hood (AlixPartners), C. Shore, A. Zatz, A. Chase, L. Miranda (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.6
11/13/2025	JA	Attend meeting with S. Greissman, A. Zatz, E. Smith (W&C), D. MacGreevey, J. Amico, K. McGlynn (AlixPartners) re: prepare for UCC meeting	0.5
11/18/2025	AP	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	CR	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	DM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	GM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	JA	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	KBM	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/18/2025	RK	Attend meeting with C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, A. Panda, C. Rubel, G. Magrisi (AlixPartners) re: ModivCare UCC professionals work plan and strategy	0.5
11/19/2025	DM	Discussion with J. Zakia (W&C) re: ModivCare testimony preparation	0.2
11/19/2025	KBM	Review case updates from Committee Counsel	0.4
11/20/2025	CH	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	CH	Call with V. Sachdev (W&C), J. Amico and C. Hood (AlixPartners) re: claims analysis	0.3
11/20/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	DM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	DM	Discussion with ModivCare UCC members re: case strategy	0.3
11/20/2025	DM	Emails with counsel to individual ModivCare UCC member re: concerns about post petition payment practices	0.2
11/20/2025	DM	Prepare for meetings with W&C and ModivCare UCC re: weekly updates and case strategies	0.5
11/20/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, S. Greissman, A. Zatz, D. Mago (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood (AlixPartners) re: weekly updates and strategy	0.6
11/20/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/20/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, (AlixPartners) and S. Greissman, A. Zatz, D. Litz (W&C) re: ModivCare UCC professionals coordination in advance of UCC meeting	0.5
11/21/2025	CH	Draft email to V. Sachdev (W&C) re: claims analysis by entity	1.1
11/21/2025	CH	Email correspondence with A. Zatz (W&C) re: operating cash receipts to date	0.3
11/21/2025	DM	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/21/2025	DM	Review email from L. Miranda re: summary of status conference	0.2

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11/21/2025	JA	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/21/2025	JL	Attend meeting with ModivCare UCC member and individual counsel, D. Litz (W&C), D. MacGreevey, J. Lee, J. Amico (AlixPartners) re: payment concerns	0.5
11/23/2025	CH	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/23/2025	JA	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/23/2025	RK	Call with J. Amico, R. Komendowski, C. Hood (AlixPartners), C. Shore and others (W&C) re: confirmation objection analysis	0.8
11/24/2025	CH	Call with J. Amico, C. Hood (AlixPartners), A. Zatz and others (W&C) re: unsecured claims analysis	0.4
11/24/2025	CH	Email correspondence with V. Sachdev (W&C) re: unsecured claims estimate	0.8
11/25/2025	AP	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	AP	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	AP	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	CH	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	CH	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	CH	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	DM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	DM	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	DM	Discussion with J. Zakia (W&C) re: debrief Magrisi deposition	0.2
11/25/2025	GM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	GM	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

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11/25/2025	JA	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	JA	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	KBM	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	KBM	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
11/25/2025	RK	Attend meeting with D. MacGreevey, J. Amico, A. Panda, R. Komendowski, C. Hood (AlixPartners), S. Greissman, A. Zatz, B. Lingle (W&C) re: confirmation objection	0.8
11/25/2025	RK	Attend meeting with A. Zatz, E. Smith, S. Greissman (W&C), D. MacGreevey, K. McGlynn, G. Magrisi, A. Panda, R. Komendowski, J. Amico, C. Hood (AlixPartners) re: preparation for Committee meeting	0.2
11/25/2025	RK	Call with K. McGlynn, G. Magrisi, A. Panda, J. Amico, R, Komendowski, C. Hood (AlixPartners), A. Zatz and others (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
Total Professional Hours			**72.8**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	17.7	$	25,842.00
Kathryn B McGlynn	$1,415	7.2		10,188.00
Marc Brown	$1,415	1.4		1,981.00
Greg Magrisi	$1,250	7.8		9,750.00
Christopher Rubel	$1,225	1.9		2,327.50
Johnny Lee	$1,225	3.5		4,287.50
Ashutosh Panda	$1,150	7.1		8,165.00
Joel Amico	$1,150	9.1		10,465.00
Matthew D Gates	$1,120	2.0		2,240.00
Ryan Komendowski	$1,080	6.4		6,912.00
Christopher Cuomo	$910	0.9		819.00
Chase Hood	$850	7.8		6,630.00
Total Professional Hours and Fees		**72.8**	**$**	**89,607.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	CH	Draft materials for upcoming Committee meeting re: liquidity and operations reporting	1.4
11/04/2025	MDG	Review presentation to Committee on claims	1.3
11/05/2025	CH	Draft updates to presentation for UCC covering claims analysis to incorporate comments from D. MacGreevey (AlixPartners)	1.6
11/05/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/05/2025	DM	Review revised draft presentation to ModivCare UCC re: preliminary claims analysis	0.4
11/05/2025	DM	Review, revise and comments on draft presentation to ModivCare UCC re: preliminary claims analysis	1.5
11/05/2025	JA	Draft materials for Committee meeting re case developments, liquidity other topics	1.5
11/05/2025	KBM	Review weekly Committee update presentation	0.6
11/05/2025	MDG	Review analysis of claims	2.0
11/06/2025	JA	Prepare materials for committee meeting	0.5
11/06/2025	MDG	Prepare for oral presentation of claims analysis	1.0
11/10/2025	CH	Draft materials for upcoming Committee meeting re: liquidity and operations reporting	1.3
11/11/2025	CH	Draft materials for upcoming Committee call re: revised DIP budget and liquidity	1.4
11/11/2025	CH	Draft updates to DIP budget and liquidity presentation to incorporate comments from J. Amico (AlixPartners)	1.3
11/12/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/12/2025	JA	Draft update materials for UCC Committee meeting	1.8
11/13/2025	JA	Draft edits to committee presentation materials	0.5
11/13/2025	KBM	Review weekly Committee update presentation	0.7
11/17/2025	CH	Draft materials for weekly Committee meeting covering liquidity and operations update	1.4
11/18/2025	JA	Prepare update materials for UCC meeting	1.3
11/19/2025	DM	Review, revise and comments on draft presentation to ModivCare UCC re: weekly updates	0.5
11/19/2025	DM	Provide additional comments on draft presentation to ModivCare UCC re: weekly updates	0.6
11/19/2025	JA	Draft Committee materials for upcoming call	0.9
11/20/2025	KBM	Review weekly Committee update presentation	0.6
11/24/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.4
11/24/2025	DM	Review and comments on draft presentation to ModivCare UCC re: weekly updates	0.8
11/24/2025	JA	Draft Committee presentation materials	1.0
11/25/2025	JA	Draft revisions to Committee materials	0.5
Total Professional Hours			**29.0**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.0	$	7,300.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Joel Amico	$1,150	8.0		9,200.00
Matthew D Gates	$1,120	4.3		4,816.00
Chase Hood	$850	9.8		8,330.00
Total Professional Hours and Fees		**29.0**	**$**	**32,334.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	TGP	Analyze potential settlement terms	0.9
11/07/2025	DM	Review emails from S. Greissman re: ModivCare settlement proposal	0.2
Total Professional Hours			**1.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Mediation and Settlement Communications
Code: 20015424PA0001.1.5

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.2	$	292.00
Thomas G Prince	$950	0.9		855.00
Total Professional Hours and Fees		**1.1**	**$**	**1,147.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	KBM	Review weekly liquidity updates	0.4
11/03/2025	CH	Review variance and liquidity reporting package for week ended 10/26	0.8
11/03/2025	JA	Analyze cash reporting vs. Plan from Company and prepare diligence questions	0.5
11/08/2025	DM	Emails with attachments to J. Amico re: changes to ModivCare DIP budget	0.6
11/10/2025	CH	Analyze revised DIP budget and related assumptions	1.5
11/10/2025	CH	Draft bridge analysis and related commentary re: overlapping period between first and second revised DIP budgets	1.4
11/10/2025	CH	Draft comparative analysis re: forecasted and actual liquidity	0.7
11/10/2025	CH	Review variance and liquidity reporting package for week ended 11/2	0.6
11/11/2025	CH	Analyze liquidity bridge analysis between filed and revised DIP budget prepared by Debtors	0.9
11/11/2025	CH	Analyze revised emergence cash sources and uses	0.6
11/11/2025	CH	Draft analysis re: bridge between beginning and ending cash in second revised DIP budget	1.6
11/11/2025	CH	Draft diligence questions for FTI re: revised DIP budget and related assumptions	0.5
11/11/2025	JA	Review revised DIP forecast and prepare questions	1.0
11/17/2025	CH	Review variance reporting and liquidity package for week ended 11/9	0.9
11/17/2025	JA	Review Debtors liquidity and post petition vendors payments status	0.7
11/20/2025	JA	Review latest liquidity forecast and emergence cash details	1.1
11/24/2025	CH	Review variance and liquidity reporting package for week ended 11/16	0.8
11/25/2025	JA	Analyze emergence liquidity under various scenarios	1.2
11/26/2025	JA	Analyze liquidity outlook	1.5
Total Professional Hours			**17.3**

AlixPartners

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Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.6	$	876.00
Kathryn B McGlynn	$1,415	0.4		566.00
Joel Amico	$1,150	6.0		6,900.00
Chase Hood	$850	10.3		8,755.00
Total Professional Hours and Fees		**17.3**	**$**	**17,097.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
11/03/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.1
11/03/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.8
11/03/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.9
11/03/2025	GM	Conduct Business Plan and CapEx analysis and materials review	1.0
11/03/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	JA	Review business plan assessment report and provide comments	1.1
11/03/2025	JL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	JL	Revise report on business plan	2.0
11/03/2025	KBM	Review draft business plan report	1.4
11/03/2025	LL	Conduct further research about historical trends and future projections for PCS Medicaid reimbursement rates to assess financial impact and inform operational planning.	2.0
11/03/2025	LL	Finalize analysis of provider mix-shift to rideshare and its contribution to service expense cost savings.	2.8
11/03/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark, L. Lovatto and J. Lee (AlixPartners) re: update call on business plan	0.5
11/03/2025	SC	Revise materials for expert report, re: Business Plan workstream	2.7
11/03/2025	TGP	Analyze the Debtors' revenue projections	1.2
11/04/2025	AP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	AP	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.1
11/04/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.2
11/04/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	0.5
11/04/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.9
11/04/2025	CC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	CC	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	CC	Review business plan draft in advance of call with W&C	0.9
11/04/2025	GM	Review Business Plan and CapEx analysis and materials review	1.0
11/04/2025	IN	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/04/2025	JL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	JL	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	JL	Revise report on business plan	1.8
11/04/2025	LL	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	LL	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.2
11/04/2025	LL	Prepare executive summary highlighting findings, sensitivities, and risk considerations for legal review.	2.5
11/04/2025	LL	Review top customer contracts re: contact center required service levels.	2.3
11/04/2025	LL	Update remaining models and report pages re: revised labor burden rate received from Debtors.	1.5
11/04/2025	SC	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/04/2025	SC	Participate in a call with A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: review report edits	0.5
11/04/2025	SC	Research benchmarks for expert report, re: Business Plan workstream	1.2
11/04/2025	SC	Revise materials for expert report, re: Business Plan workstream	2.4
11/04/2025	TGP	Analyze the Debtors' cost projections	1.1
11/04/2025	TGP	Participate in a call with A. Panda, J. Lee, I. Nelson, S. Clark, L. Lovatto, T. Prince, and C. Cuomo (AlixPartners) re: PCS segment	0.3
11/05/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	AP	Review all EBITDA upside scenarios re: AlixPartners business plan expert report	2.8
11/05/2025	AP	Review all opportunity opinions re: AlixPartners business plan expert report	2.6
11/05/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.3
11/05/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.6
11/05/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	DM	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Magrisi Expert Report	0.3
11/05/2025	DM	Review and comments on draft Magrisi report	1.2
11/05/2025	ESK	Review and revise Magrisi Expert Report	2.3
11/05/2025	ESK	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Magrisi Expert Report	0.3
11/05/2025	GM	Review Business Plan and CapEx analysis and materials review	1.1
11/05/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	JA	Review and provide comments on business plan assessment	0.6
11/05/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	JL	Revise report on business plan	1.4
11/05/2025	LL	Finalize business plan evaluation report for service expense and PCS sections, ensuring alignment between narrative, exhibits, and model outputs.	2.0
11/05/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	LL	Update PCS branch organization design section with revised role mapping and consolidation savings estimates.	1.5
11/05/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: contract review	0.2
11/05/2025	SC	Research benchmarks for expert report, re: Business Plan	2.6
11/05/2025	SC	Review materials for expert report around benchmarking, re: Business Plan	1.6
11/05/2025	SC	Revise materials for expert report, re: Business Plan	2.7
11/05/2025	TGP	Analyze the Debtors' financial projections under various cost scenarios	1.9
11/06/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.9
11/06/2025	AP	Finalize EBITDA upside scenarios re: AlixPartners business plan expert report	2.0
11/06/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
11/06/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.2
11/06/2025	ESK	Revise Expert Report	1.6
11/06/2025	ESK	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Expert Report	0.4
11/06/2025	GM	Review Business Plan and CapEx analysis	1.2
11/06/2025	GM	Review materials for Business Plan and CapEx analysis	1.8
11/06/2025	JL	Revise report on business plan	1.2
11/06/2025	LL	Review report formatting, citations, and supporting schedules for consistency and professional presentation.	2.0
11/06/2025	SC	Create back-up materials to supplement expert report, re: Business Plan	2.8
11/06/2025	SC	Research industry benchmarks for back-office functions for expert report, re: Business Plan	1.8
11/06/2025	SC	Review benchmarks and materials for expert report, re: Business Plan	0.9
11/06/2025	SC	Revise materials around benchmarking for expert report, re: Business Plan	2.6
11/06/2025	TGP	Analyze the Debtors' financial projections under various cost scenarios	1.8
11/07/2025	CC	Create questions in advance of deposition with ModivCare management	0.9
11/07/2025	ESK	Revise Expert Report	0.2
11/07/2025	GM	Review Business Plan and CapEx analysis	3.0
11/07/2025	GM	Review materials for Business Plan and CapEx analysis	1.5
11/07/2025	GM	Meeting with G. Magrisi, L Lovatto (AlixPartners) re: review Business Plan	0.1
11/07/2025	GM	Call with G. Magrisi, S Clark (AlixPartners) re: review Business Plan assessment	0.2
11/07/2025	JA	Review latest draft of business plan assessment and provide follow up diligence requests	0.9
11/07/2025	JL	Revise report on business plan	1.5
11/07/2025	KBM	Review updates re: business plan expert report	0.4
11/07/2025	LL	Meeting with G. Magrisi, L Lovatto (AlixPartners) re: review Business Plan	0.1

AlixPartners

ModivCare Inc., et al.
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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	LL	Update value tracker to reflect refined run-rate savings, cost to achieve and implementation timeline.	1.0
11/07/2025	RK	Review business plan rebuttal report for valuation analysis inputs.	2.4
11/07/2025	RK	Update valuation analysis for LC assumptions.	1.2
11/07/2025	SC	Call with G. Magrisi, S Clark (AlixPartners) re: review Business Plan assessment	0.2
11/07/2025	SC	Research additional benchmarks, industry trends, and data points to support expert report, re: Business Plan	2.9
11/07/2025	SC	Revise materials for expert report, re: Business Plan	2.6
11/07/2025	TGP	Analyze the Debtors' financial projections under various revenue and cost scenarios	1.6
11/08/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.9
11/08/2025	AP	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.8
11/08/2025	CC	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	CC	Prepare analysis of actual versus guidance for revenue and adjusted EBITDA	2.8
11/08/2025	CC	Respond to email from E. Smith of W&C re: report edits	0.2
11/08/2025	GM	Review Business Plan and CapEx analysis	1.0
11/08/2025	GM	Review materials for Business Plan and CapEx analysis	1.6
11/08/2025	GM	Attend discussion with C. Shore, E. Smith, J. Zakia (W&C), D. MacGreevey, G. Magrisi, A. Panda, C. Cuomo (AlixPartners) re: Magrisi expert report	0.3
11/08/2025	KBM	Review updates re: business plan expert report	0.6
11/09/2025	GM	Review Business Plan and CapEx analysis and materials review	1.7
11/10/2025	AP	Finalize all opportunity opinions re: AlixPartners business plan expert report	2.1
11/10/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.2
11/10/2025	AP	Update to draft outline and key sections of the AlixPartners business plan expert report	2.8
11/10/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	DM	Emails with J. Amico re: ModivCare Georgia contract	0.2
11/10/2025	ESK	Email to/from D. MacGreevey (AlixPartners) re: finalization and execution of the Expert Report	0.3
11/10/2025	ESK	Review final Expert Report	0.5
11/10/2025	GM	Discussion with D. MacGreevey, G. Magrisi (AlixPartners) re: Magrisi report	0.2
11/10/2025	GM	Review Business Plan and CapEx analysis and materials review	7.0
11/10/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	JL	Finalize review/edits of business plan report in preparation for submission	1.6
11/10/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.6

AlixPartners

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Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	KBM	Review final business plan expert report	1.1
11/10/2025	LL	Analyze corporate, NEMT and PCS real estate leases to assess opportunities of footprint optimization.	2.8
11/10/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	LL	Review terms and conditions of NEMT customer contracts.	2.5
11/10/2025	SC	Prepare back-up support for the G. Magrisi (AlixPartners) expert report re: the Debtors' business plan	2.8
11/10/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark, L. Lovatto, and C. Cuomo (AlixPartners) re: business plan expert report updates.	0.5
11/10/2025	SC	Prepare supporting bullets for findings in expert report, re: Business Plan	2.9
11/10/2025	SC	Update expert report with additional insights and supporting information, re: Business Plan	1.2
11/11/2025	AP	Prepare for deposition of Greg Magrisi re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.5
11/11/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.4
11/11/2025	LL	Update report to include external sources consulted during research process.	1.5
11/11/2025	SC	Prepare summary of supporting documents in expert report re: Debtors' Business Plan	0.8
11/11/2025	SC	Review deposition transcript for B. Gutierrez	2.7
11/11/2025	SC	Review deposition transcript for S.Kern	2.6
11/12/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	AP	Prepare for deposition of Greg Magrisi (AlixPartners) re: operating cost opinions re: AlixPartners business plan rebuttal report	2.9
11/12/2025	AP	Prepare for deposition of Greg Magrisi (AlixPartners) re: revenue opinions re: AlixPartners business plan rebuttal report	2.9
11/12/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.8
11/12/2025	CC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	ESK	Emails re: expert report	0.2
11/12/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.0
11/12/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	LL	Review open business plan questions	0.3
11/12/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	SC	Participate in a call with G. Magrisi, A. Panda, J. Lee, S. Clark,L. Lovatto, and C. Cuomo (AlixPartners) re: business plan wrap up	0.2
11/12/2025	SC	Review deposition transcript for K. Shepard	2.8

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/13/2025	AP	Prepare for deposition of Greg Magrisi on operating cost opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	2.8
11/13/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	2.6
11/13/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.1
11/13/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.5
11/13/2025	LL	Analyze earnings calls transcripts from 2022 to Q1 2025.	2.0
11/13/2025	SC	Prepare supporting points in expert report, re: Business Plan	1.9
11/13/2025	SC	Review deposition transcripts, B. Guitierrez, S. Kern	1.8
11/13/2025	SC	Research historical Debtor financial reporting to support expert report	1.8
11/13/2025	SC	Review support materials for expert report, re: Business Plan	2.0
11/13/2025	TGP	Review Magrisi report	0.8
11/14/2025	AP	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	AP	Prepare for deposition of Greg Magrisi on operating cost opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.1
11/14/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan forecast and projections	1.3
11/14/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/14/2025	GM	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	JL	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	LL	Participate in a call with G. Magrisi, A. Panda, J. Lee, L. Lovatto (AlixPartners) re: business plan wrap up coordination	0.5
11/14/2025	LL	Researched and analyzed historical NEMT Medicaid reimbursement rate for NEMT across states.	3.0
11/17/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.6
11/17/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.5
11/17/2025	SC	Prepare for deposition, re: Business Plan diligence	2.4
11/18/2025	AP	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	AP	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	AP	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	AP	Prepare for deposition of Greg Magrisi on capex opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.5
11/18/2025	AP	Prepare for deposition of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
11/18/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/18/2025	GM	Participate in a call with G. Magrisi and S. Clark (AlixPartners), re: Business Plan diligence	1.4

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	GM	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	GM	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	GM	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Participate in a call with G. Magrisi, A. Panda and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Participate in a call with G. Magrisi, A. Panda, and L. Lovatto (AlixPartners) re: service expense diligence.	0.6
11/18/2025	LL	Prepared supplementary document re: methodology per request from Debtors' counsel.	1.5
11/18/2025	RK	Prepare confirmation rejection objection analyses.	2.8
11/18/2025	SC	Participate in a call with G. Magrisi and S. Clark (AlixPartners), re: Business Plan diligence	1.4
11/18/2025	SC	Working session with G. Magrisi, A. Panda and S Clark (AlixPartners) re: finance functional diligence.	1.4
11/18/2025	SC	Prepare for deposition, re: Business Plan diligence	2.4
11/19/2025	AP	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	AP	Prepare for deposition of Greg Magrisi on cost savings opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.9
11/19/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/19/2025	GM	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	JL	Participate in a call with G. Magrisi, A Panda and J Lee (AlixPartners), re: Business Plan diligence	1.2
11/19/2025	LL	Prepare supporting analysis and related files re: approach and methodology per request from Debtors' counsel.	1.2
11/19/2025	SC	Prepare for deposition, re: Business Plan diligence	1.6
11/20/2025	AP	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	AP	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	AP	Prepare for deposition of Greg Magrisi on cost savings opinions re: AlixPartners rebuttal report on Debtors business plan and projections	1.5
11/20/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.0
11/20/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	GM	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/20/2025	GM	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	LL	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	LL	Review documents and materials for deposition preparation	0.7
11/20/2025	LL	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	RK	Prepare confirmation objection analysis.	1.7
11/20/2025	RK	Review confirmation objection outline.	3.0
11/20/2025	RK	Review plan supplement for confirmation objection impacts.	1.9
11/20/2025	SC	Follow-up call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/20/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	1.2
11/20/2025	SC	Participate in a working session with G. Magrisi, A. Panda, S. Clark, L. Lovatto (AlixPartners) and J. Zakia and E. Smith (W&C) re: upcoming deposition, upcoming filings and other case matters	3.0
11/20/2025	SC	Prepare for deposition re: Business Plan diligence	2.6
11/21/2025	AP	Participate in a call with G. Magrisi and A. Panda (AlixPartners) and E. Smith (W&C) re: deposition preparation.	0.5
11/21/2025	AP	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	3.5
11/21/2025	GM	Attend Marc Brown deposition re: valuation expert report	4.0
11/21/2025	GM	Participate in a call with G. Magrisi and A. Panda (AlixPartners) and E. Smith (W&C) re: deposition preparation.	0.5
11/21/2025	GM	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	LL	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	LL	Review past deposition transcripts and researched follow up topics for deposition preparation.	2.5
11/21/2025	RK	Observation of valuation expert deposition.	4.5
11/21/2025	RK	Review confirmation objection draft.	2.6
11/21/2025	SC	Listen to deposition of M. Brown	2.3
11/21/2025	SC	Participate in a call with G. Magrisi, A. Panda, S. Clark and L. Lovatto (AlixPartners) re: deposition preparation.	0.5
11/21/2025	SC	Prepare for deposition, re: Business Plan diligence	1.9
11/22/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	2.2
11/23/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	4.5
11/23/2025	RK	Review confirmation objection draft.	1.8

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/24/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	1.3
11/24/2025	ESK	Emails with internal team re: expert report issues	0.5
11/24/2025	RK	Observation of Magrisi deposition.	2.8
11/25/2025	AP	Update key assertions and opinions in the confirmation objection draft re: Debtor's business plan forecast and projections	2.9
11/25/2025	AP	Review discovery documents for each segment re: Debtor's business plan forecast and projections	2.9
11/25/2025	RK	Review expert rebuttal reports for confirmation objection.	1.9
Total Professional Hours			**346.2**

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PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.7	$	2,482.00
Kathryn B McGlynn	$1,415	3.5		4,952.50
Greg Magrisi	$1,250	59.7		74,625.00
Johnny Lee	$1,225	13.5		16,537.50
Elizabeth S Kardos	$950	6.3		5,985.00
Ashutosh Panda	$1,150	98.3		113,045.00
Joel Amico	$1,150	2.6		2,990.00
Iain Nelson	$1,120	0.3		336.00
Ryan Komendowski	$1,080	26.6		28,728.00
Thomas G Prince	$950	8.7		8,265.00
Christopher Cuomo	$910	6.8		6,188.00
Susan Clark	$910	73.7		67,067.00
Lucas Lovatto	$835	44.5		37,157.50
Total Professional Hours and Fees		**346.2**	**$**	**368,358.50**

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Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	DM	Review draft list of priority diligence questions	0.2
11/03/2025	JA	Analyze Debtors underlying financial model and evaluate various working capital requirements	1.5
11/03/2025	JA	Draft diligence questions for upcoming depositions	1.0
11/03/2025	JA	Draft diligence questions re open issues, emergence cash and claims	0.8
11/03/2025	JA	Review data room uploads and reconcile against outstanding questions list	1.0
11/03/2025	JT	Analyze working capital fluctuations from 12/31/25 to 12/31/26 in the company's valuation model	1.9
11/03/2025	KBM	Review updates re: outstanding information requests	0.4
11/03/2025	MDG	Review diligence items needed for lien challenge and update requests for Debtors	1.0
11/04/2025	JA	Analyze various issues re cash collateral, sureties and letters of credit	1.2
11/04/2025	JA	Draft and review of various waterfall scenarios based on different valuation scenarios	1.0
11/04/2025	JA	Draft diligence questions on business plan and certain assumptions on go forward cash requirements for upcoming diligence sessions	1.5
11/04/2025	JA	Review various data room documents re historical financial projections	0.5
11/04/2025	MDG	Analyze historical revenue figures by segment	0.3
11/04/2025	MDG	Update due diligence requests and send to Debtors	0.7
11/05/2025	CH	Review new documents uploaded to virtual data room for responsive documents	1.3
11/05/2025	DM	Review email with attachments from J. Amico re: diligence of ModivCare LC's	0.3
11/05/2025	JA	Analyze various documents re emergence liquidity, insurance and cash collateral	0.7
11/05/2025	JA	Draft questions list for upcoming depositions re business plan, Q1 2025 transactions and liquidity requirements	1.5
11/05/2025	JT	Analyze entity level trial balance for potential claims	0.7
11/05/2025	JT	Review company assumptions related to letters of credit	0.6
11/05/2025	MDG	Review data requests for lien challenge	1.6
11/05/2025	MDG	Update due diligence requests for Debtors	0.6
11/05/2025	TGP	Analyze the Debtors' assets by segment	2.3
11/06/2025	JA	Review documents and prepare proposed questions for upcoming depositions	1.4
11/06/2025	JA	Review various documents re projections per request from W&C	1.0
11/06/2025	JT	Analyze the intercompany matrix as of 7/31/25	1.7
11/06/2025	JT	Summarized outstanding surety bonds and LCs	1.4
11/06/2025	MDG	Review operating metrics file from Debtors	1.0
11/06/2025	TGP	Analyze the Debtors' historical balance sheet changes	1.6
11/07/2025	CH	Review operating metrics for postpetition period	0.7
11/07/2025	CH	Review update from counsel re: S. Kern deposition	0.4
11/07/2025	DM	Prepare diligence questions re: Shepard deposition	0.5
11/07/2025	JA	Analyze various supporting documents re exit financing providers	1.0
11/07/2025	JA	Draft various potential questions for upcoming depositions as well as flagging supporting documents	1.7
11/07/2025	JA	Working session with J. Amico and J. Tutty (AlixPartners) re: analysis of intercompany balances by legal entity	0.6
11/07/2025	JT	Analyze the assets and liabilities at each entity as of August 31	2.8
11/07/2025	JT	Analyze the intercompany balances held by each entity based on the trial balance and intercompany matrix	1.5

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/07/2025	JT	Develop a summary of each entity's P&L as of August 31	1.7
11/07/2025	JT	Summarized total and scheduled claims at each entity	1.6
11/07/2025	JT	Working session with J. Amico and J. Tutty (AlixPartners) re: analysis of intercompany balances by legal entity	0.6
11/07/2025	MDG	Analyze operational metrics file and follow up with questions to FTI	0.8
11/07/2025	TGP	Analyze the Debtors change in working capital historically vs. projected	1.8
11/10/2025	CH	Review actuals performance for August and September	1.6
11/10/2025	CC	Research real estate fee applications for J. Amico of AlixPartners	0.3
11/10/2025	JA	Analyze Disclosure Statement projections and reconcile to various components used in valuation materials	1.3
11/10/2025	JA	Analyze proposals related to exit financing and prepare diligence questions	1.0
11/10/2025	JA	Review update on Debtor contract situation and impact on go forward budget	0.5
11/11/2025	CH	Review summary from counsel re: Silvers investigation report	0.3
11/11/2025	DM	Emails with E. Smith, A. Zatz (W&C), B. Marks (Latham), J. Amico re: ModivCare diligence and production of reliance materials	0.2
11/11/2025	JA	Review historical projections changes over time	0.8
11/11/2025	KBM	Review updates re: outstanding diligence requests	0.2
11/11/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/12/2025	DM	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/12/2025	JA	Draft diligence questions for upcoming Debtor depositions (business plan, sale process, liquidity)	1.3
11/12/2025	JA	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/12/2025	JA	Review and provide comments on UCC standing motion draft; follow up with additional diligence requests	1.5
11/12/2025	JA	Review K. Shepard deposition transcript	0.5
11/12/2025	JA	Review various capital structure changes and leverage over time	1.2
11/12/2025	JA	Review various debtor produced materials related to exit financing process	0.6
11/12/2025	RK	Meeting with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare liability management and exit financing	0.4
11/13/2025	DM	Review 11.12.25 letter from Latham to UST re: ModivCare	0.3
11/13/2025	JA	Review and provide comment on lien challenge and standing motion	1.0
11/13/2025	JA	Review data room for recent documents uploaded, review and summarize	1.2
11/13/2025	JA	Review UCC expert reports to identify areas of further diligence support	1.2
11/13/2025	KBM	Review Debtors' letter to the U.S. Trustee re: settlement phone call between ad hoc group and former board member	0.3
11/13/2025	KBM	Review updates re: outstanding diligence requests	0.3
11/14/2025	JA	Draft questions for upcoming Debtor depositions on business plan and liquidity	1.2
11/14/2025	JA	Prepare debtor diligence list re sources and uses at emergence	1.0
11/14/2025	JA	Review and provide comments on assumptions and calculations in UCC standing motion	0.8
11/14/2025	JA	Review data room re financial projections diligence	0.5
11/17/2025	CH	Review summary from counsel re: D. Gonzales deposition	0.5
11/17/2025	JA	Draft questions and review of related documents for Jamal deposition	1.0

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DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/17/2025	JA	Draft questions and review of related documents for Shandler deposition	1.5
11/17/2025	JA	Review Debtor and UCC valuation reports and identify methodology differences	1.2
11/18/2025	JA	Analyze exit financing providers and related term sheet proposals	0.5
11/18/2025	JA	Review data room for various projections over time per W&C request	1.0
11/18/2025	JA	Review documents produced and draft of questions for upcoming Debtor depositions	1.3
11/19/2025	JA	Review data room and identify certain projections version per W&C request	0.6
11/19/2025	JA	Review data room and identify supporting documents re uptier transaction and capital structure changes in Q1 2025	1.0
11/19/2025	JA	Review Plan Supplement and analyze contract rejections	1.0
11/19/2025	JA	Review relevant documents and draft questions for Jamal deposition	1.3
11/19/2025	JT	Revised analysis of FY26 NWC projections by balance sheet line item	1.1
11/19/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/20/2025	JA	Analyze various GUC cashout scenarios	0.5
11/21/2025	CH	Draft analysis re: postpetition operating receipts received to date	1.4
11/21/2025	CH	Research re: Matrix JV ownership	0.4
11/21/2025	JA	Analyze legal entity org structure and legal entity trial balance to support UCC motions	0.7
11/21/2025	JA	Review post petition cash generated and other related analysis for W&C	1.2
11/21/2025	JA	Review rights offering calculations	0.5
11/23/2025	JA	Analyze Plan documents and develop supporting scenarios to support Confirmation objection	1.3
11/24/2025	JA	Analyze various settlement proposals and impact on recoveries	0.8
11/24/2025	JA	Revise supporting waterfall analysis under different Plan recoveries	1.3
11/24/2025	JA	Review various claims and causes of action listed re Plan Settlement	0.6
11/25/2025	CH	Analyze scheduled and statement filings re: causes of action identified as assets	0.5
11/25/2025	JA	Draft supporting schedules for various financial statements in Plan objection motion	0.6
11/25/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2
11/26/2025	JA	Analyze insurance related obligations	0.5
Total Professional Hours			**89.6**

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Attn: Chad J. Shandler, Chief Transformation Officer
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Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.9	$	2,774.00
Kathryn B McGlynn	$1,415	1.2		1,698.00
Joel Amico	$1,150	50.8		58,420.00
Matthew D Gates	$1,120	6.0		6,720.00
Ryan Komendowski	$1,080	0.4		432.00
John Tutty	$950	15.6		14,820.00
Thomas G Prince	$950	5.7		5,415.00
Christopher Cuomo	$910	0.3		273.00
Chase Hood	$850	7.1		6,035.00
Lisa Marie Bonito	$580	0.6		348.00
Total Professional Hours and Fees		**89.6**	**$**	**96,935.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	DM	Review ModivCare Debtors' motion for exit financing	0.3
11/05/2025	JA	Review W&C motion and assist with providing various financial inputs	1.5
11/10/2025	JA	Analyze motion to employ real estate advisor and related follow up diligence	0.9
11/10/2025	JA	Review draft of UCC standing motion and provide comments	0.6
11/11/2025	JA	Analyze certain preference actions and other disclosures made in the Statement of Financial Affairs	1.2
11/21/2025	JA	Review confirmation objection draft and provide comments	1.1
11/23/2025	JA	Review and provide comments on confirmation objection and prepare supporting backup	0.8
11/24/2025	JA	Draft supporting financial schedules for Plan objection	1.6
11/24/2025	JA	Review and provide comments on confirmation objection	2.5
11/25/2025	JA	Review and provide comments to Plan objection motion	2.5
Total Professional Hours			**13.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Joel Amico	$1,150	12.7		14,605.00
Total Professional Hours and Fees		**13.0**	**$**	**15,043.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	RK	Prepare deposition questions for upcoming former CFO deposition.	2.7
11/03/2025	CR	Analyze post-petition financial information related to revenue and receivables.	0.5
11/03/2025	CR	Assist counsel with preparation for Gutierrez deposition.	1.3
11/03/2025	CR	Meeting with C. West, A. Chase, and L. Miranda (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of uptier transaction	0.4
11/03/2025	DM	Review and add to draft lists of questions for ModivCare management meeting and Guitterez deposition	0.4
11/03/2025	DM	Provide comments on revised draft Magrisi report re: ModivCare business plan	0.7
11/03/2025	JT	Meeting with C. West, A. Chase, and L. Miranda (W&C); C. Rubel and J. Tutty (AlixPartners) re: review of uptier transaction	0.4
11/03/2025	JT	Revise analysis of uptier transaction based on historical pricing data	2.4
11/04/2025	CR	Assist counsel with preparation for Scott Kern deposition.	1.3
11/05/2025	CR	Attend Barbara Gutierrez deposition	2.8
11/05/2025	DM	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	DM	Review draft standing motion re: ModivCare lien challenge	0.8
11/05/2025	ESK	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	GM	Attend discussion with G. Magrisi, D. MacGreevey, E. Kardos (AlixPartners) re: Magrisi report	0.4
11/05/2025	JT	Draft questions for K. Shepard disposition	0.7
11/05/2025	RK	Preparation and review of deposition questions.	1.8
11/06/2025	CR	Attend Scott Kern deposition	3.0
11/06/2025	DM	Analyze various surety bond and exit financing issues	1.3
11/06/2025	DM	Telephone call with D. MacGreevey and E. Kardos (AlixPartners) re: Expert Report	0.4
11/06/2025	DM	Provide comments on Magrisi report	0.8
11/06/2025	JL	Prepare questions/topics for consideration in management depositions	0.4
11/07/2025	DM	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	DM	Review and comments on Magrisi expert report	3.5
11/07/2025	DM	Review revised Magrisi expert report	0.7
11/07/2025	ESK	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	GM	Attend discussion with D. MacGreevey, G. Magrisi, E. Kardos (AlixPartners) re: Magrisi report	1.8
11/07/2025	JL	Review and edit questions/topics for deposition	0.5
11/07/2025	MDG	Provide additional information re: lien challenge motion	2.0
11/08/2025	DM	Review C. Shore comments to Magrisi expert report	0.8
11/08/2025	DM	Review email with attachment from G. Magrisi re: draft questions for K. Shepard deposition	0.4
11/09/2025	DM	Review revised Magrisi expert report	1.1
11/10/2025	AP	Attend Ken Shepard deposition	2.9
11/10/2025	CR	Attend the deposition of Ken Shepard	8.0
11/10/2025	DM	Discussion with D. MacGreevey, G. Magrisi (AlixPartners) re: Magrisi report	0.2

AlixPartners

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	DM	Emails with E. Kardos and G. Magrisi (AlixPartners) re: distribution of Magrisi report	0.3
11/10/2025	DM	Review and comments on M. Brown report re: ModivCare valuation	1.2
11/10/2025	DM	Review and comments on Magrisi expert report re: ModivCare business plan	1.6
11/10/2025	DM	Review Magrisi expert ModivCare report for expenses discussion	0.5
11/10/2025	GM	Attend Ken Shepard deposition	2.5
11/10/2025	JA	Attend Ken Shepard deposition	2.5
11/11/2025	AP	Attend Heath Sampson, CEO of Modivcare deposition	5.0
11/11/2025	CR	Attend Heath Sampson, CEO of Modivcare deposition	3.0
11/11/2025	JA	Attend Heath Sampson, CEO of Modivcare deposition	2.3
11/11/2025	JT	Correspond with D. Litz (W&C) re: make whole event	0.4
11/11/2025	JT	Develop an estimate for the total cost of triggering the Make-Whole Event of the credit agreement	0.7
11/11/2025	JT	Develop charts to summarize historical trading prices of the company's unsecured notes	0.6
11/11/2025	RK	Prepare questions for upcoming depositions.	1.7
11/12/2025	CH	Review draft motion lien challenge standing motion and related complaint	1.2
11/12/2025	CR	Analyze market data related to uptier collateral valuation.	1.8
11/12/2025	CR	Uptier damages analysis for draft complaint and standing motion.	1.7
11/12/2025	DM	Analyze market for LME’s from 2020 to 2025 re: ModivCare uptier	2.0
11/12/2025	JT	Correspond with E. Smith (W&C) re: unsecured notes	0.3
11/12/2025	JT	Review the company's Q1 2025 10-Q filing for disclosures re: incremental term loan proceeds	0.5
11/12/2025	JT	Revised chart to summarize trading prices of the 2L notes	0.6
11/12/2025	JT	Revised chart with the company's debt balances as of the uptier transaction and petition dates	0.9
11/12/2025	TGP	Review transcript of K. Sheppard deposition	0.7
11/13/2025	CR	Attend Daniel SIlvers deposition	8.0
11/13/2025	DM	Review draft UCC standing motion and complaint re: ModivCare lien challenge	0.9
11/13/2025	JA	Attend Daniel SIlvers deposition	2.0
11/13/2025	JT	Corresponded with D. Kiyosaki (FTI) re: Wells Fargo control account	0.3
11/13/2025	JT	Corresponded with L. Miranda (W&C) re: proceeds from incremental term loan	0.3
11/13/2025	JT	Review files related to incremental term loan for detail on the Wells Fargo controlled account	1.1
11/13/2025	JT	Review sources and uses excel detail of proceeds from the incremental term loan	0.4
11/13/2025	KBM	Review litigation related updates	0.4
11/13/2025	TGP	Review draft lien challenge complaint	0.6
11/13/2025	TGP	Review draft lien challenge standing motion	0.7
11/14/2025	AP	Attend David Mounts Gonzales deposition	5.8
11/14/2025	CR	Prepare analysis re: counsel (W&C) requests related to uptier valuation in connection with related standing motion and complaint.	1.7
11/14/2025	CR	Attend David Mounts Gonzales deposition	5.0
11/14/2025	CR	Review draft complaint and standing motion related to uptier challenge.	1.3
11/14/2025	DM	Attend David Mounts Gonzales deposition	4.9
11/14/2025	DM	Review standing motion and complaint	0.3

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/14/2025	DM	Review 11.13.25 letter from AI Catalyst to UST	0.2
11/14/2025	DM	Review and comments on draft questions for Jamal and Shandler depositions	0.3
11/14/2025	DM	Review draft standing motion and complaint re: ModivCare uptier transaction	0.6
11/14/2025	JA	Attend David Mounts Gonzales deposition	2.0
11/14/2025	KBM	Review UCC lien challenge adversary complaint	0.9
11/14/2025	KBM	Review UCC's lien challenge standing motion	1.1
11/17/2025	AP	Attend Kevin Glodowski, First Lien Holders deposition	5.8
11/17/2025	CR	Assist counsel (W&C) with diligence requests in preparation for the Jamal (Moelis) deposition.	1.5
11/17/2025	CR	Assist counsel (W&C) with diligence requests in preparation for the Shandler (FTI) deposition.	1.8
11/17/2025	CR	Listen to Leslie Norwalk (Board member) deposition	3.8
11/17/2025	DM	Attend Kevin Glodowski, First Lien Holders deposition	5.2
11/17/2025	DM	Review emails with B. Marks (Latham), J. Zakia, C. Shore (W&C), J. Amico and G. Magrisi re: Magrisi reliance materials	0.3
11/17/2025	JA	Attend Leslie Norwalk (Board member) deposition	1.4
11/17/2025	JA	Attend Kevin Glodowski, First Lien Holders deposition	1.2
11/18/2025	CR	Assist counsel (W&C) with preparation for M. Brown (AlixPartners) deposition.	1.8
11/18/2025	CR	Draft discussion topics for counsel in connection with Jamal (Moelis) deposition preparation.	1.8
11/18/2025	CR	Draft analysis re: Q1-2025 uptier transactions.	2.3
11/19/2025	AP	Attend Chad Shandler (FTI), CTO deposition	5.8
11/19/2025	CR	Assist counsel (W&C) with preparation of outline for Jamal (Moelis) deposition.	1.8
11/19/2025	CR	Listened to Chad Shandler (FTI) deposition.	3.0
11/19/2025	CR	Listened to Chad Shandler (FTI) deposition.	3.5
11/19/2025	DM	Partial attendance at deposition of C. Shandler (FTI) as ModivCare 30b6 witness	2.2
11/19/2025	DM	Review 11.18.25 letters from W&C to Quinn and Latham	0.4
11/19/2025	JA	Participate in the Shandler deposition	1.2
11/20/2025	AP	Attend Zul Jamal Moelis deposition	2.9
11/20/2025	CR	Financial analysis related to standing motion and complaint.	1.5
11/20/2025	CR	Listened to Zul Jamal (Moelis) deposition.	3.5
11/20/2025	CR	Listened to Zul Jamal (Moelis) deposition.	3.0
11/20/2025	DM	Partial attendance at deposition of Z. Jamal (Moelis) as ModivCare 30b6 witness	4.4
11/20/2025	JA	Attend Zul Jamal Moelis deposition	1.5
11/20/2025	JL	Continue participation in G. Magrisi deposition prep	1.4
11/20/2025	JL	Attend Zul Jamal Moelis deposition	1.3
11/21/2025	AP	Attend Marc Brown deposition re: valuation expert report	8.0
11/21/2025	CR	Assist counsel (W&C) with M. Brown (AlixPartners) deposition preparation.	2.0
11/21/2025	CR	Attend Marc Brown deposition re: valuation expert report	6.0
11/21/2025	MB	Participate in Marc Brown deposition re: valuation expert report	6.4
11/21/2025	RK	Update recovery analysis scenarios for confirmation objection.	0.9
11/21/2025	SC	Attend Marc Brown deposition re: valuation expert report	2.8
11/22/2025	RK	Update recovery analysis scenarios for confirmation objection.	2.6
11/22/2025	RK	Continue to update recovery analysis scenarios for confirmation objection.	2.7
11/24/2025	AP	Attend Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.8

AlixPartners

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Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/24/2025	GM	Prepare for Business Plan Rebuttal Report Deposition	1.5
11/24/2025	GM	Participate in Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.5
11/24/2025	JL	Attend Greg Magrisi Deposition re: Business Plan Rebuttal Report	7.1
11/24/2025	KBM	Review supplement to lien support challenge	0.3
11/24/2025	SC	Attend deposition of Greg Magrisi	8.0
11/25/2025	AP	Review transcript of deposition of Greg Magrisi (AlixPartners) re: Magrisi analyses and opinions in the Magrisi rebuttal report on Debtors' business plan and projections	1.4
11/25/2025	DM	Attend D. Rowe (Jupiter) deposition	0.2
11/25/2025	DM	Review revised draft ModivCare confirmation objection	0.8
11/26/2025	AP	Attend David Mounts Gonzalez, former Modivcare Board member deposition	2.5
11/26/2025	AP	Review transcript of deposition of Greg Magrisi (AlixPartners) re: analyses and opinions in the Magrisi rebuttal report on Debtors' business plan and projections	2.9
11/26/2025	AP	Review transcripts from deposition of Marc Brown (AlixPartners), Chad Shandler (FTI), Ken Shepard (ModivCare), and Heath Sampson(ModivCare) re: Debtors' business plan and projections, Q1 transactions, and rebuttal of Debtors' valuation expert report	2.9
11/26/2025	DM	Discussion with M. Jacques re: prior work with Mounts Gonzales	0.2
11/26/2025	DM	Partial attendance at continued deposition of David Mounts Gonzales	1.1
Total Professional Hours			**259.5**

AlixPartners

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Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	40.9	$	59,714.00
Kathryn B McGlynn	$1,415	2.7		3,820.50
Marc Brown	$1,415	6.4		9,056.00
Greg Magrisi	$1,250	13.7		17,125.00
Christopher Rubel	$1,225	77.1		94,447.50
Johnny Lee	$1,225	10.7		13,107.50
Elizabeth S Kardos	$950	2.2		2,090.00
Ashutosh Panda	$1,150	53.7		61,755.00
Joel Amico	$1,150	14.1		16,215.00
Matthew D Gates	$1,120	2.0		2,240.00
Ryan Komendowski	$1,080	12.4		13,392.00
John Tutty	$950	9.6		9,120.00
Thomas G Prince	$950	2.0		1,900.00
Susan Clark	$910	10.8		9,828.00
Chase Hood	$850	1.2		1,020.00
Total Professional Hours and Fees		**259.5**	**$**	**314,830.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	MDG	Analyze claims data and related analysis	1.7
11/03/2025	TGP	Analyze the Debtors' claims pool	1.1
11/05/2025	CH	Draft correspondence to D. MacGreevey (AlixPartners) re: claims analysis and related assumptions	0.8
11/05/2025	CH	Draft updates to claims analysis to incorporate comments from D. MacGreevey (AlixPartners)	1.9
11/05/2025	CH	Review individual claim filings in connection with revised claims analysis	1.1
11/05/2025	JA	Analyze claims filed, scheduled and related analysis	1.2
11/05/2025	JL	Review claim filings and research background of claim amounts for large claims	0.8
11/05/2025	KBM	Review updates re: claims and waterfall analysis	0.4
11/05/2025	TGP	Analyze the Debtors' claims pool	1.3
11/06/2025	CH	Analyze proposed contract cure cost and related estimated claims	1.7
11/06/2025	CH	Convert contract assumption and cure cost schedule to excel format	0.8
11/07/2025	JA	Review intercompany matrix and various claims	1.3
11/10/2025	JA	Analyze various unsecured claims filed in case	1.0
11/14/2025	JA	Review various unsecured claims filed and scheduled and diligence of GUC claims analysis	1.0
11/18/2025	JA	Analyze filed claims, scheduled claims and debtors claims analysis to determine GUC pool	1.3
11/19/2025	CH	Analyze contract rejection schedule and related claims exposure	1.8
11/20/2025	CH	Analyze contract and customer claims by Debtor entity	1.1
11/20/2025	CH	Analyze litigation claims by Debtor entity	1.5
11/20/2025	CH	Analyze trade claims by Debtor entity	1.8
11/20/2025	CH	Call with J. Amico and C. Hood (AlixPartners) re: claims analysis	0.5
11/20/2025	JA	Call with J. Amico and C. Hood (AlixPartners) re: claims analysis	0.5
11/20/2025	JA	Call with V. Sachdev (W&C), J. Amico and C. Hood (AlixPartners) re: claims analysis	0.3
11/20/2025	JA	Review claims register and perform analysis of GUC claims	1.0
11/21/2025	CH	Analyze revised claims register received from Verita for new and updated claims	1.6
11/21/2025	KBM	Review updates re: GUC claims pool	0.4
11/23/2025	CH	Analyze 2L claim components	0.4
11/23/2025	JA	Analyze various claims estimates and reconciliations for UCC objection	1.1
11/24/2025	CH	Draft analysis re: unsecured claims for voting purposes	1.7
11/24/2025	JA	Analyze general unsecured claims estimate and range of outcomes under the cash out option	0.6
11/24/2025	JA	Call with J. Amico, C. Hood (AlixPartners), A. Zatz and others (W&C) re: unsecured claims analysis	0.4
11/24/2025	KBM	Review updated GUC analysis	0.3
11/25/2025	CH	Draft updates to claims analysis to incorporate claims objections to date	0.7
11/25/2025	CH	Review first omnibus claim objection filed	0.4
Total Professional Hours			**33.5**

AlixPartners

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Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Kathryn B McGlynn	$1,415	1.1	$	1,556.50
Johnny Lee	$1,225	0.8		980.00
Joel Amico	$1,150	9.7		11,155.00
Matthew D Gates	$1,120	1.7		1,904.00
Thomas G Prince	$950	2.4		2,280.00
Chase Hood	$850	17.8		15,130.00
Total Professional Hours and Fees		**33.5**	**$**	**33,005.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/01/2025	MW	Review warrant valuation methodology/calculations.	1.0
11/03/2025	CR	Draft and reviewed valuation expert report.	1.8
11/03/2025	JA	Review and provide comments on valuation expert report	1.0
11/03/2025	KBM	Review draft valuation report	0.9
11/03/2025	MB	Analyze Jamal report	2.1
11/03/2025	MR	Perform analysis of ModivCare valuation metrics over time.	2.8
11/03/2025	MR	Perform analysis of public company credit metrics for ModivCare valuation.	2.6
11/03/2025	RK	Review debtors plan documentation for waterfall analysis.	2.7
11/03/2025	RK	Sensitize waterfall analysis for counsel questions.	1.3
11/04/2025	CR	Draft and reviewed valuation expert report.	1.8
11/04/2025	DM	Review and comments on Brown ModivCare expert report	0.8
11/04/2025	JT	Prepare historical debt pricing data for company peers	0.8
11/04/2025	JT	Develop a summary of the identified difference in FY26 use of net working capital within the company's valuation model	2.4
11/04/2025	JT	Revised slides in valuation model deck based on comments received	2.8
11/04/2025	MB	Analyze Jamal report	1.7
11/04/2025	MB	Conducted valuation analysis	2.6
11/04/2025	MB	Review industry research	0.9
11/04/2025	MR	Edit analysis of ModivCare cost of capital.	1.7
11/04/2025	MR	Prepare draft expert report re: ModivCare valuation.	2.5
11/04/2025	MW	Analyze warrant valuation methodology and calculations	0.5
11/04/2025	RK	Prepare expert rebuttal report of valuation.	3.0
11/04/2025	RK	Review document produced for valuation analysis.	2.6
11/05/2025	CR	Review and drafted valuation expert report.	1.2
11/05/2025	CA	Perform review and quality control analysis of discounted cash flow analysis	0.6
11/05/2025	CA	Perform review and quality control analysis of guideline company method valuation analysis and underlying data	2.2
11/05/2025	CA	Perform review and quality control analysis of guideline transaction method valuation analysis and underlying data	2.5
11/05/2025	MB	Draft expert report	0.9
11/05/2025	MB	Review liquidation analysis	0.4
11/05/2025	MR	Perform quality review of draft expert report re: ModivCare valuation.	2.9
11/05/2025	RK	Review business plan rebuttal report.	2.1
11/06/2025	CR	Review and drafted valuation expert report.	1.7
11/06/2025	CA	Perform review and quality control analysis of weighted-average cost of capital analysis	0.9
11/06/2025	CA	Prepare list of documents considered in valuation report	0.8
11/06/2025	DM	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	DM	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	JA	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	JA	Draft supporting slides for surety and cash collateral re valuation materials	1.2

AlixPartners

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Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/06/2025	JA	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	MB	Draft valuation report	2.2
11/06/2025	MB	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	MR	Perform quality review of ModivCare valuation analysis.	2.1
11/06/2025	MR	Perform research re: healthcare industry trends for ModivCare valuation analysis.	0.9
11/06/2025	MR	Prepare draft expert report re: ModivCare valuation.	1.7
11/06/2025	RK	Attend discussion with D. MacGreevey, M. Brown, R. Komendowski, J. Amico (AlixPartners) re: ModivCare LC and surety bond analysis	0.5
11/06/2025	RK	Discussion with D. MacGreevey, J. Amico, R. Komendowski (AlixPartners) re: ModivCare LC and surety bond analysis	1.0
11/06/2025	RK	Review underlying LC assumptions used to support the Moelis recovery analysis.	2.4
11/07/2025	CA	Perform review and quality control of valuation expert report	2.3
11/07/2025	CA	Review the Jamal report and other referenced materials in valuation expert report	1.8
11/07/2025	JA	Review and provide comments on revised valuation materials	1.2
11/07/2025	KBM	Review updates re: valuation expert report	0.4
11/07/2025	MB	Draft valuation report	1.1
11/07/2025	MB	Review business plan report	2.1
11/07/2025	MB	Review valuation analysis	1.9
11/07/2025	MR	Perform quality review of ModivCare valuation analysis.	0.9
11/07/2025	MR	Prepare draft expert report re: ModivCare valuation.	2.0
11/07/2025	RK	Analyze letters of credit and surety bonds for recovery analysis.	2.0
11/07/2025	RK	Attend discussion with J. Zakia, E. Smith, A. Chase (W&C), D. MacGreevey, G. Magrisi, C. Rubel, R. Komendowski, J. Amico (AlixPartners) re: prepare for ModivCare CEO deposition	0.5
11/07/2025	RK	Update recovery analysis rebuttals for adjustments to valuation analysis.	2.2
11/08/2025	MB	Draft valuation report	1.1
11/08/2025	RK	Prepare expert rebuttal report for valuation analysis.	2.5
11/08/2025	RK	Sensitize recovery analysis for counsel assumptions.	2.7
11/09/2025	KBM	Review updates re: valuation expert report	0.4
11/09/2025	RK	Finalize valuation analysis for rebuttal report.	1.2
11/09/2025	RK	Prepare rebuttal report exhibits.	1.8
11/09/2025	RK	Prepare expert rebuttal report for valuation analysis.	3.0
11/10/2025	CA	Finalization and review of the Brown valuation expert report	2.6
11/10/2025	CA	Review updates to the draft valuation expert report	0.5
11/10/2025	KBM	Review final valuation expert report	0.9
11/10/2025	MB	Draft valuation report	3.4
11/10/2025	MB	Review ModivCare financial data	0.6
11/10/2025	MB	Review valuation analysis	1.7
11/10/2025	MR	Finalize expert report re: ModivCare valuation.	2.3
11/10/2025	MR	Perform quality review of draft expert report.	2.6
11/10/2025	MR	Perform quality review of ModivCare valuation analysis for draft expert report.	3.0
11/10/2025	MR	Review supporting documents re: ModivCare valuation analysis.	0.8
11/10/2025	RK	Final review of valuation rebuttal analysis.	2.7

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/10/2025	RK	Finalize valuation analysis for rebuttal report.	3.0
11/10/2025	RK	Review business plan rebuttal report for valuation impacts.	1.9
11/10/2025	RK	Review recovery analysis sensitivity analysis.	2.1
11/11/2025	MB	Review valuation data	0.6
11/11/2025	MR	Prepare supporting documents used to prepare ModivCare valuation analysis for production.	0.7
11/11/2025	RK	Accumulation and transfer of reliance materials for the valuation rebuttal report.	1.1
11/12/2025	MB	Prepare for deposition	1.1
11/12/2025	MB	Review reliance materials	0.4
11/12/2025	MR	Review reliance materials for M. Brown (AlixPartners) Expert Report re: valuation.	2.5
11/12/2025	MR	Perform analysis re: market pricing of ModivCare debt.	1.5
11/12/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	1.9
11/12/2025	RK	Review ModivCare LME and Exit financing.	1.9
11/13/2025	MB	Review Modivcare SEC filings	1.4
11/13/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	1.2
11/13/2025	TGP	Review expert rebuttal report of M. Brown	1.1
11/14/2025	CA	Perform research of competitors at the request of the expert	0.4
11/14/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.5
11/17/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	MB	Review expert reports	2.1
11/17/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	MR	Analyze Jamal expert report to prepare for expert depositions.	2.2
11/17/2025	MR	Perform valuation analysis to prepare for expert deposition.	1.1
11/17/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.6
11/17/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/17/2025	RK	Prepare expert for rebuttal valuation report.	1.9
11/17/2025	RK	Review plan supplement for recovery analysis adjustments.	2.5
11/17/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	0.9
11/18/2025	AP	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	CR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	GM	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	JL	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	MB	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	MB	Review expert reports	2.4
11/18/2025	MB	Review valuation model	1.3

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/18/2025	MB	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	MR	Perform valuation analysis to prepare for expert deposition.	2.0
11/18/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.5
11/18/2025	MR	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/18/2025	RK	Participate in a call with M Brown, R Komendowski, J Lee, A Panda and G. Magrisi (AlixPartners), re: Valuation and Business Plan	0.5
11/18/2025	RK	Discussion with M. Brown, M. Root, C. Rubel and R. Komendowski (AlixPartners) re: valuation analysis	1.0
11/19/2025	MB	Review expert reports	1.9
11/19/2025	MB	Review Modivcare bankruptcy filings	2.6
11/19/2025	MB	Review Moelis financial materials	0.8
11/19/2025	MR	Perform valuation analysis to prepare for expert deposition.	2.1
11/19/2025	RK	Prepare valuation rebuttal deposition.	3.0
11/20/2025	MB	Meeting with J. Zakia and E. Smith (W&C) re: deposition	1.9
11/20/2025	MB	Review expert reports	3.4
11/20/2025	MB	Review financial models	2.4
11/20/2025	MB	Review Modivcare SEC filings	1.4
11/20/2025	MB	Review Modivcare bankruptcy filings	1.8
11/20/2025	MR	Perform valuation analysis to prepare for expert deposition.	1.7
11/20/2025	MR	Prepare deposition preparation materials re: ModivCare valuation.	2.8
11/20/2025	MR	Review precedent transaction data to prepare for expert deposition.	0.9
11/20/2025	MR	Review public filings for selected publicly traded companies to prepare for expert deposition.	1.4
11/20/2025	RK	Prepare valuation rebuttal deposition.	2.0
11/21/2025	MB	Review expert report	0.9
11/21/2025	MR	Review valuation materials to prepare for expert deposition.	0.3
11/22/2025	CH	Analyze waterfall scenarios and illustrative recoveries	1.9
11/22/2025	CH	Draft email to R. Komendowski re: waterfall analysis	0.3
11/24/2025	MB	Prepare for confirmation hearing	0.7
11/24/2025	MR	Perform analysis of ModivCare valuation to prepare for confirmation hearing.	0.8
11/24/2025	RK	Prepare analysis for confirmation objection.	1.2
11/24/2025	RK	Review valuation report for confirmation objection.	1.0
11/25/2025	MB	Review confirmation brief	1.1
11/25/2025	MR	Perform research re: publicly traded company method to prepare for ModivCare confirmation hearing.	1.8
11/25/2025	RK	Review confirmation objection figures.	2.3
Total Professional Hours			**222.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	2.3	$	3,358.00
Kathryn B McGlynn	$1,415	2.6		3,679.00
Marc Brown	$1,415	53.8		76,127.00
Greg Magrisi	$1,250	0.5		625.00
Christopher Rubel	$1,225	8.4		10,290.00
Johnny Lee	$1,225	0.5		612.50
Ashutosh Panda	$1,150	0.5		575.00
Joel Amico	$1,150	4.9		5,635.00
Ryan Komendowski	$1,080	60.5		65,340.00
Matthew Root	$1,000	63.2		63,200.00
Matthew Wicker	$1,000	1.5		1,500.00
John Tutty	$950	6.0		5,700.00
Thomas G Prince	$950	1.1		1,045.00
Chase Hood	$850	2.2		1,870.00
Claire Allshouse	$810	14.6		11,826.00
Total Professional Hours and Fees		**222.6**	**$**	**251,382.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/05/2025	CH	Review draft motion for standing	0.8
11/05/2025	CH	Review exit financing motion	0.4
11/06/2025	DM	Review presentation by ModivCare Debtors on ERO	0.4
11/07/2025	CH	Review exit facility outreach and competing proposals received	1.4
11/07/2025	KBM	Review exit facility proposals	0.9
11/08/2025	DM	Review presentation from ModivCare Debtors re: exit financing process and term sheets	0.6
11/10/2025	DM	Emails with attachments with J. Amico (AlixPartners) re: diligence of ModivCare exit financing process	0.3
11/12/2025	DM	Emails with J. Amico re: ModivCare exit financing process	0.2
11/17/2025	CH	Review plan supplements filed and related exhibits	1.8
11/17/2025	DM	Review ModivCare Plan supplement	1.5
11/18/2025	DM	Research re: exit financing work fees and expense reimbursement in comparable cases	0.7
11/18/2025	KBM	Review Plan Supplement	0.8
11/19/2025	DM	Assessment of email from A. Zatz (W&C) re: outline for confirmation objection	0.3
11/19/2025	DM	Emails with A. Zatz and B. Lingle (W&C) re: proposed ModivCare exit financing work fee and expense reimbursement	0.2
11/19/2025	KBM	Review confirmation objection related items	0.6
11/20/2025	TGP	Analyze the Debtors' Exit financing credit agreement	0.7
11/20/2025	TGP	Analyze the Debtors' New Warrants Agreement	0.9
11/20/2025	TGP	Analyze the Debtors' Plan Supplement	1.2
11/21/2025	CH	Analyze equity rights offering assumptions and value	1.3
11/21/2025	CH	Review equity rights offering procedures	0.6
11/21/2025	CH	Review initial draft of confirmation objection	0.7
11/23/2025	CH	Analyze GUC cashout recovery estimate	0.5
11/24/2025	DM	Provide comments on draft ModivCare confirmation objection	1.7
11/24/2025	KBM	Review changes to draft Confirmation objection	0.9
11/24/2025	KBM	Review second Plan supplement	0.4
11/25/2025	CH	Analyze latest settlement proposal from ad hoc group and estimated recovery value	0.6
11/25/2025	CH	Review and provide additional comments to further revised confirmation objection	1.4
11/25/2025	CH	Review second plan supplement re: retained causes of action	0.4
11/25/2025	CH	Revise and provide comments to revised confirmation objection	1.3
Total Professional Hours			**23.5**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	5.9	$	8,614.00
Kathryn B McGlynn	$1,415	3.6		5,094.00
Thomas G Prince	$950	2.8		2,660.00
Chase Hood	$850	11.2		9,520.00
Total Professional Hours and Fees		**23.5**	**$**	**25,888.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	DM	Review first supplemental declaration iso ModivCare retention	0.5
11/03/2025	KSM	Review updated proposed retention order	0.3
11/03/2025	LCB	Emails with G. Zahiremanmi (W&C), K. Sundt and J. Braverman (AlixPartners) re: filing of AlixPartners 1st Supplemental Declaration	0.3
11/04/2025	LCB	Review court docket for AlixPartners order	0.2
Total Professional Hours			**1.3**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Retention Application & Relationship Disclosures
Code: 20015424PA0001.1.19

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Kaitlyn Sundt McClarren	$715	0.3		214.50
Laurie Capen Verry	$600	0.5		300.00
Total Professional Hours and Fees		**1.3**	**$**	**1,244.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	1.3
11/03/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	0.6
11/04/2025	KSM	Review first monthly fee application	0.4
11/04/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	0.8
11/04/2025	MDG	Review professional fees for September fee statement	0.7
11/04/2025	MDG	Review September 2025 monthly fee statement	0.6
11/05/2025	DM	Review ModivCare September monthly fee statement	0.5
11/05/2025	LMB	Prepare First Monthly Fee Statement, supporting schedules and exhibits (September 2025)	0.4
11/05/2025	LMB	Correspondence to (W&C) attaching the First Monthly Fee Statement (September 2025) for filing on the Court docket	0.2
11/07/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.4
11/10/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	0.7
11/11/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.0
11/12/2025	LMB	Analyze professional fees for October 2025 Monthly Fee Statement for privilege and confidentiality	2.2
11/12/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	3.2
11/14/2025	LMB	Continue to prepare professional fees for October 2025 Monthly Fee Statement	3.2
11/14/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	3.4
11/20/2025	DM	Emails with E. Kardos (AlixPartners) re: ModivCare Lenders reservation of rights wrt/ UCC fees	0.2
11/20/2025	DM	Review ModivCare Lenders reservation of rights wrt/ UCC fees	0.2
Total Professional Hours			**23.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.9	$	1,314.00
Matthew D Gates	$1,120	1.3		1,456.00
Kaitlyn Sundt McClarren	$715	0.4		286.00
Lisa Marie Bonito	$580	20.4		11,832.00
Total Professional Hours and Fees		**23.0**	**$**	**14,888.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/03/2025	TGP	Analyze potential recoveries for creditors	2.2
11/04/2025	TGP	Analyze potential recoveries for creditors	2.4
11/05/2025	DM	Review draft ModivCare waterfall recovery slides	0.3
11/05/2025	RK	Sensitize waterfall analysis for updated valuation analysis.	1.9
Total Professional Hours			**6.8**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Intercompany & Waterfall Analysis
Code: 20015424PA0001.1.22

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.3	$	438.00
Ryan Komendowski	$1,080	1.9		2,052.00
Thomas G Prince	$950	4.6		4,370.00
Total Professional Hours and Fees		**6.8**	**$**	**6,860.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
11/19/2025	RK	Travel Geneva IL to New York, NY (attend deposition)	4.0
11/21/2025	MB	Travel from New York, NY to Chicago, IL (return from deposition)	2.3
11/24/2025	GM	Travel from home to Latham Boston (to attend deposition)	0.7
Total Professional Hours			**7.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
Marc Brown	$1,415	2.3		3,254.50
Greg Magrisi	$1,250	0.7		875.00
Ryan Komendowski	$1,080	4.0		4,320.00
Total Professional Hours and Fees		**7.0**	**$**	**8,449.50**
Less 50% Travel Fees				(8,890.00)
Total Professional Fees			**$**	**(440.50)**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
11/19/2025	Airfare Marc Brown 2025-11-19 ORD- LGA	128.48
11/19/2025	Airfare Ryan Komendowski 2025-11-19 ORD- LGA	280.98
11/19/2025	Lodging Ryan Komendowski Ritz Carlton Central Park, New York, NY 2025-11-19 2025-11-21 (two night stay)	1,500.00
11/19/2025	Lodging Marc Brown - Ritz Carlton Central Park, New York, NY 2025-11-19 2025-11-21 (two night stay)	1,500.00
11/19/2025	Individual Meal - Marc Brown - Breakfast	5.16
11/19/2025	Individual Meal - Marc Brown - Lunch	6.17
11/19/2025	Individual Meal - Ryan Komendowski - Breakfast	13.31
11/19/2025	Individual Meal - Ryan Komendowski - Lunch	60.00
11/19/2025	Group Meal - Marc Brown - Dinner - Ryan Komendowski; Marc Brown	160.00
11/20/2025	Taxi/Car Service Ryan Komendowski Hotel to LGA	124.52
11/20/2025	Taxi/Car Service Marc Brown LGA to Hotel	132.60
11/20/2025	Individual Meal - Marc Brown - Breakfast	21.32
11/20/2025	Individual Meal - Marc Brown - Lunch	31.68
11/21/2025	Airfare Ryan Komendowski 2025-11-21 LGA- ORD	171.64
11/21/2025	Airfare Marc Brown 2025-11-21 LGA- ORD	197.44
11/21/2025	Parking/Tolls Ryan Komendowski	134.45
11/21/2025	Taxi/Car Service Marc Brown Hotel to LGA	126.18
11/21/2025	Taxi/Car Service Ryan Komendowski LGA to Hotel	128.97
11/21/2025	Parking/Tolls Marc Brown	129.00
11/21/2025	Individual Meal - Ryan Komendowski - Breakfast	25.22
11/21/2025	Individual Meal - Ryan Komendowski - Lunch	28.02
11/21/2025	Individual Meal - Ryan Komendowski - Dinner	52.21
11/21/2025	Individual Meal - Marc Brown - Lunch	60.00
11/21/2025	Individual Meal - Marc Brown - Breakfast	40.00
11/24/2025	Taxi/Car Service Greg Magrisi Home to Latham office	24.12

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
11/24/2025	Taxi/Car Service Greg Magrisi Latham office to Home	28.73
11/24/2025	Individual Meal - Greg Magrisi - Breakfast	10.91
Total Expenses		**5,121.11**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Expenses		**Amount**
Airfare	$	778.54
Ground Transportation		828.57
Lodging		3,000.00
Meals		514.00
Total Expenses	**USD**	**5,121.11**

Exhibit D

Fourth Monthly Fee Statement
December 1, 2025 through December 29, 2025

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

In re:	Chapter 11
MODIVCARE, INC., *et al.*,[1]	Case No. 25-90309 (ARP)
Debtors.	(Jointly Administered)
	Objection Deadline: January 29, 2026 @ 4:00 p.m. (CT)

FOURTH MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Name of Applicant:	**AlixPartners, LLP**	
Applicant's Role in Case:	Financial Advisor to the Official Committee of Unsecured Creditors	
Date of Employment Order:	November 3, 2025, effective as of September 10, 2025 [Docket No. 644]	
Time period covered by this Fee Statement:	**Beginning Date**	**End Date**
	12/1/2025	12/29/2025
Summary of Total Fees and Expenses Requested		
Total fees requested in this Fee Statement:	$481,950.60 (80% of $602,438.25)	
Total expenses requested in this Fee Statement:	$16,839.23	
Total fees and expenses requested in this Fee Statement:	$498,789.83	
Blended hourly rate for professionals:	$1,087.04	

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [Docket No. 500], each party receiving notice of the monthly fee statement will have until 4:00 p.m. (Prevailing Central Time, 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtors are authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY PROFESSIONAL
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Professional	Title	Rate	Hours	Fees
David MacGreevey	Partner & Managing Director	$1,460	49.9	$ 72,854.00
Kathryn B McGlynn	Partner & Managing Director	$1,415	16.1	22,781.50
Marc Brown	Partner & Managing Director	$1,415	55.7	78,815.50
Greg Magrisi	Partner & Managing Director	$1,250	49.6	62,000.00
Christopher Rubel	Partner	$1,225	53.2	65,170.00
Johnny Lee	Partner	$1,225	3.7	4,532.50
Ashutosh Panda	Director	$1,150	31.4	36,110.00
Joel Amico	Director	$1,150	80.9	93,035.00
Ryan Komendowski	Director	$1,080	66.5	71,820.00
Matthew Root	Director	$1,000	49.7	49,700.00
Kaitlyn Sundt McClarren	Director	$715	0.6	429.00
John Tutty	Senior Vice President	$950	3.7	3,515.00
Thomas G Prince	Senior Vice President	$950	1.9	1,805.00
Christopher Cuomo	Senior Vice President	$910	0.4	364.00
Chase Hood	Senior Vice President	$850	68.1	57,885.00
Lucas Lovatto	Vice President	$835	1.0	835.00
Lisa Marie Bonito	Vice President	$580	21.8	12,644.00
Total Hours and Fees for Professionals			**554.2**	**$ 634,295.50**
Less: 50% Travel Fees				(31,857.25)
Total Fees for Professionals				**$ 602,438.25**
Less: 20% Holdback				(120,487.65)
Total Fees for Professionals Less Holdback				**$ 481,950.60**

Average Billing Rate **$ 1,087.04**

ALIXPARTNERS, LLP

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Code	Matter Category	Hours	Fees
1.1	Planning, Coordination and Case Management	3.2	$ 3,706.00
1.2	Meetings & Communication with UCC and Creditors	18.0	20,772.00
1.3	Prepare Committee Presentations	10.6	11,905.50
1.7	Liquidity and Cash Management	6.2	5,660.00
1.9	Business and Strategic Plan	39.5	47,320.00
1.11	Financial and Other Diligence	40.5	42,895.00
1.12	Other Motions and Related Objections	4.1	4,850.00
1.13	Litigation Support & Investigations	48.7	59,804.00
1.14	Claims Analysis	13.2	12,180.00
1.15	Valuation and Solvency Analysis	104.6	121,856.00
1.17	RSA, Disclosure Statement & Plan of Reorganization	27.5	27,076.00
1.18	Court Hearings and Status Conferences	153.1	184,505.50
1.20	Fee Applications & Fee Statements	35.5	28,051.00
1.31	Travel Time	49.5	31,857.25
	Total Hours and Fees By Matter Category Before Holdback	**554.2**	**$ 602,438.25**

Average Billing Rate $ 1,087.04

ALIXPARTNERS, LLP

SUMMARY OF EXPENSES
DECEMBER 1, 2025 THROUGH DECEMBER 29, 2025

Expense Category	Amount
Airfare	$ 4,136.61
Ground Transportation	2,674.13
Lodging	8,797.53
Meals	1,230.96
Total Expenses	**$ 16,839.23**

AlixPartners, LLP ("AlixPartners"), as financial advisor to Official Committee of Unsecured Creditors (the "Committee") to the above-captioned debtors (the "Debtors"), hereby submits this third monthly fee statement (the "Fee Statement") seeking compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from December 1, 2025 through December 29, 2025 (the "Compensation Period").

Detailed descriptions of the services performed by each professional, organized by matter category and by date, and the hours of services provided (in tenths of an hour) during the Compensation Period are attached hereto as **Exhibit A**.

A detailed list of the out-of-pocket expenses incurred during the Compensation Period are attached hereto as **Exhibit B**.

WHEREFORE, AlixPartners, as financial advisor to the Committee, respectfully requests: (i) an allowance of compensation for professional services in the amount of $602,438.25 and reimbursement of out-of-pocket expenses in the amount of $16,839.23 for the Compensation Period; (ii) that, upon the expiration of the objection deadline, the Debtors are authorized and directed to pay AlixPartners fees in the amount of $481,950.60 (80% of $602,438.25) and 100% of out-of-pocket expenses in the amount of $16,839.23 for a total amount of $498,789.83; and (iii) such other and further relief as this Court deems proper.

Dated: January 15, 2026

ALIXPARTNERS, LLP
909 Third Avenue, 28th Floor
New York, New York 10022

/s/ David MacGreevey
By: David MacGreevey
Partner & Managing Director

Exhibit A

Detailed Description of AlixPartners' Fees and Hours by Matter Category

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	CH	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	CC	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	GM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	JA	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	KBM	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
12/02/2025	RK	Call with D. MacGreevey, K. McGlynn, J. Amico, R. Komendowski, G. Magrisi, A. Panda, C. Cuomo, C. Hood (AlixPartners) re: ongoing workstreams, coordination of priority tasks, and next steps	0.4
Total Professional Hours			**3.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Planning, Coordination and Case Management
Code: 20015424PA0001.1.1

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.4	$	584.00
Kathryn B McGlynn	$1,415	0.4		566.00
Greg Magrisi	$1,250	0.4		500.00
Ashutosh Panda	$1,150	0.4		460.00
Joel Amico	$1,150	0.4		460.00
Ryan Komendowski	$1,080	0.4		432.00
Christopher Cuomo	$910	0.4		364.00
Chase Hood	$850	0.4		340.00
Total Professional Hours and Fees		**3.2**	**$**	**3,706.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CR	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	DM	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	DM	Communication with J. Zakia (W&C) re: ModivCare confirmation hearing	0.3
12/01/2025	JA	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/01/2025	RK	Attend call with A. Zatz, A. Chase, S. Greissman (W&C). D. MacGreevey, J. Amico, C. Rubel, R. Komendowski (AlixPartners) re: ModivCare uptier complaint	0.8
12/03/2025	CH	Email correspondence with V. Sachdev (W&C) re: contract rejection analysis	0.4
12/03/2025	CH	Email correspondence with V. Sachdev (W&C) re: revised legal entity analysis	0.7
12/03/2025	CH	Review update from counsel re: status conference	0.2
12/04/2025	AP	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	AP	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	CH	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	CR	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	CR	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	DM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	DM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	GM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/04/2025	GM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	JA	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	JA	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	KBM	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	KBM	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/04/2025	RK	Attend meeting with ModivCare UCC members and individual counsel, C. Shore, S. Greissman, A. Zatz (W&C), D. MacGreevey, J. Amico, K. McGlynn, C. Hood, R. Komendowski, G. Magrisi, A. Panda, C. Rubel (AlixPartners) re: case updates and strategy	0.5
12/04/2025	RK	Participate in a call with D. MacGreevey, K. McGlynn, J. Amico, G. Magrisi, A. Panda, C. Rubel, R. Komendowski, (AlixPartners) and C. Shore, A. Zatz, S. Greissman, and D. Lots (W&C) re: prepare for upcoming Committee call	0.2
12/05/2025	KBM	Review case updates and next steps re: Confirmation hearing from Committee Counsel	0.7
12/07/2025	CH	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	CH	Draft email to W&C re: plan voting and critical vendor payment analysis	0.8
12/07/2025	DM	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	JA	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/07/2025	RK	Call with D. MacGreevey, J. Amico, R. Komendowski, C. Hood (AlixPartners) and V. Sachdev (W&C) re: lien challenge reply	0.7
12/08/2025	CH	Draft email to A. Zatz and V. Sachdev (W&C) re: claim voting analysis	0.8
12/09/2025	CH	Review update from counsel re: exit financing	0.2
12/18/2025	CH	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	DM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2025	GM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	JA	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
12/18/2025	KBM	Call with D. MacGreevey, K. McGlynn, G. Margrisi, J. Amico, C. Hood (AlixPartners), C. Shore, S. Greissman, and A. Zatz (W&C), and Committee members re: case updates, ongoing workstreams, and next steps	0.5
Total Professional Hours			**18.0**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Meetings & Communication with UCC and Creditors
Code: 20015424PA0001.1.2

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.0	$	4,380.00
Kathryn B McGlynn	$1,415	1.9		2,688.50
Greg Magrisi	$1,250	1.2		1,500.00
Christopher Rubel	$1,225	1.5		1,837.50
Ashutosh Panda	$1,150	0.7		805.00
Joel Amico	$1,150	2.7		3,105.00
Ryan Komendowski	$1,080	2.2		2,376.00
Chase Hood	$850	4.8		4,080.00
Total Professional Hours and Fees		**18.0**	**$**	**20,772.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.3
12/03/2025	JA	Draft UCC weekly update materials	1.6
12/04/2025	KBM	Review weekly update presentation	0.7
12/10/2025	CH	Prepare materials for upcoming Committee meeting re: liquidity and operations update	1.3
12/15/2025	JA	Prepare summary slides on Plan for Committee	1.5
12/16/2025	DM	Review draft presentation to ModivCare UCC re: Plan recoveries	0.5
12/16/2025	JA	Draft of materials for Committee re recoveries under Plan	1.3
12/17/2025	DM	Review revised draft slides for ModivCare UCC re: Plan vs offered recoveries	0.5
12/17/2025	JA	Draft of materials for Committee re recoveries under Plan	1.2
12/18/2025	JA	Prepare for upcoming Committee meeting on Plan recoveries and next steps	0.7
Total Professional Hours			**10.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Prepare Committee Presentations
Code: 20015424PA0001.1.3

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.0	$	1,460.00
Kathryn B McGlynn	$1,415	0.7		990.50
Joel Amico	$1,150	6.3		7,245.00
Chase Hood	$850	2.6		2,210.00
Total Professional Hours and Fees		**10.6**	**$**	**11,905.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Review intercompany matrix and transaction detail uploaded to dataroom	1.4
12/01/2025	CH	Review non-Debtor intercompany transaction detail uploaded to dataroom	0.9
12/01/2025	CH	Review variance and liquidity reporting package for week ended 11/23	0.8
12/01/2025	JA	Analyze UCC professional fee forecasts per Debtor requests	0.5
12/03/2025	JA	Review company cash reporting and evaluate go forward liquidity	0.8
12/07/2025	CH	Review first day motion reporting re: critical vendor payments and intercompany transactions	0.4
12/10/2025	CH	Review variance and liquidity reporting package for week ended 11/23	0.9
12/15/2025	CH	Review variance and liquidity reporting package for week ended 12/7	0.5
Total Professional Hours			**6.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Liquidity and Cash Management
Code: 20015424PA0001.1.7

PROFESSIONAL	RATE	HOURS		FEES
Joel Amico	$1,150	1.3	$	1,495.00
Chase Hood	$850	4.9		4,165.00
Total Professional Hours and Fees		**6.2**	**$**	**5,660.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	AP	Review of business plan rebuttal report in preparation for review with counsel	0.5
12/04/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	1.0
12/05/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	1.5
12/07/2025	GM	Review Business Plan Rebuttal Report for testimony preparation	3.0
12/08/2025	AP	Prepare for expert testimony of Greg Magrisi re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/08/2025	CH	Draft analysis re: business plan forecast compared to actual performance	1.8
12/08/2025	GM	Business Plan Rebuttal Report Testimony preparation with counsel (all day preparation session)	11.0
12/08/2025	LL	Review top 20 customers contracts and synthesized terms and clauses re: risk sharing	1.0
12/09/2025	AP	Prepare for expert testimony of Greg Magrisi on cost and capex opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/09/2025	AP	Prepare for expert testimony of Greg Magrisi on revenue opinions re: AlixPartners rebuttal report on Debtors business plan and projections	2.9
12/09/2025	GM	Business Plan Rebuttal Report Testimony preparation with counsel (all day preparation session)	11.0
Total Professional Hours			**39.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Business and Strategic Plan
Code: 20015424PA0001.1.9

PROFESSIONAL	RATE	HOURS		FEES
Greg Magrisi	$1,250	27.5	$	34,375.00
Ashutosh Panda	$1,150	9.2		10,580.00
Chase Hood	$850	1.8		1,530.00
Lucas Lovatto	$835	1.0		835.00
Total Professional Hours and Fees		**39.5**	**$**	**47,320.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Review monthly operating reports and financial data for October	1.8
12/01/2025	JA	Review Debtor and UCC deposition transcripts re draft of follow up items	1.2
12/01/2025	JA	Review Debtors reporting re balance sheet and monthly operating reports re post petition payables	1.3
12/01/2025	JA	Review filing and historical documents re uptier transaction	1.2
12/01/2025	RK	Review uptier analysis considerations	1.3
12/02/2025	CH	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	CH	Review October trial balance and management financial reporting	1.3
12/02/2025	JA	Identification and draft of key open diligence requests	0.6
12/02/2025	JA	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	JA	Review and provide comments on various emails and other correspondence from W&C re info for confirmation hearing	1.1
12/02/2025	JA	Review data room re recent financial performance package	0.4
12/02/2025	JA	Review of monthly operating reports to derive recent operating performance	0.5
12/02/2025	JT	Internal call with J. Amico, J. Tutty, C. Hood (AlixPartners) re: legal entity analysis	0.5
12/02/2025	JT	Revised analysis of balance sheet and profitability by legal entity	1.8
12/03/2025	JA	Analyze filed monthly operating report reporting re recent performance and payments of prepetition claims	1.1
12/03/2025	JA	Analyze various outcomes of Plan confirmation and impact on recoveries	1.0
12/03/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/04/2025	JA	Analyze voting results and prepare summary based on vendors paid	1.3
12/04/2025	JA	Prepare for upcoming UCC Committee meeting	0.5
12/04/2025	JA	Review data room re historical recent financial performance and vendors classified as critical to pay prepetition claims	1.0
12/04/2025	RK	Review expert materials for upcoming trial.	2.7
12/05/2025	JA	Review debtors supplemental declaration: Jamal	0.7
12/05/2025	JA	Review debtors supplemental declaration: Shandler	0.8
12/05/2025	RK	Review expert materials for upcoming trial.	3.0
12/07/2025	CH	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/07/2025	JA	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/07/2025	JT	Analyze general unsecured claims cash out elections	1.1
12/07/2025	JT	Internal call with J. Amico, J. Tutty, and C. Hood (AlixPartners) re: analysis of critical vendors	0.3
12/08/2025	JA	Review and response to various requests from W&C re diligence for Confirmation hearing	1.0
12/09/2025	JA	Review and response to W&C diligence requests re Confirmation hearing	1.0
12/09/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/10/2025	CH	Review data room for detailed Debtor and non-Debtor org chart	0.4
12/10/2025	RK	Prepare demonstratives for conformation hearing.	2.6
12/11/2025	RK	Prepare documents for confirmation hearing.	2.4

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/18/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/23/2025	JA	Analyze revised warrant agreement	1.0
12/23/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3
12/29/2025	JA	Analyze warrant agreement	1.0
12/29/2025	RK	Review updated warrant computation.	1.8
Total Professional Hours			**40.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Financial and Other Diligence
Code: 20015424PA0001.1.11

PROFESSIONAL	RATE	HOURS	FEES
Joel Amico	$1,150	17.5	20,125.00
Ryan Komendowski	$1,080	13.8	14,904.00
John Tutty	$950	3.7	3,515.00
Chase Hood	$850	4.3	3,655.00
Lisa Marie Bonito	$580	1.2	696.00
Total Professional Hours and Fees		**40.5**	**$ 42,895.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	JA	Review and provide comments on various motions re Confirmation hearing	0.8
12/04/2025	JA	Review and provide comments on various W&C drafts and analysis for confirmation hearing	1.5
12/05/2025	JL	Review and provide comments/speaking points related to Debtors plan support filings and rebuttal of expert report	1.8
Total Professional Hours			**4.1**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Other Motions and Related Objections
Code: 20015424PA0001.1.12

PROFESSIONAL	RATE	HOURS		FEES
Johnny Lee	$1,225	1.8	$	2,205.00
Joel Amico	$1,150	2.3		2,645.00
Total Professional Hours and Fees		**4.1**	**$**	**4,850.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CR	Draft direct testimony scripts and exhibits in preparation for trial.	3.2
12/02/2025	CR	Draft direct testimony scripts and related demonstratives in preparation for trial.	2.3
12/02/2025	CR	Valuation research in preparation for trial.	1.8
12/03/2025	CR	Developed Jamal cross exam points in preparation for trial.	1.5
12/03/2025	CR	Draft direct testimony script and related demonstratives in preparation for trial.	2.5
12/03/2025	CR	Review Jamal and Brown deposition transcripts in preparation for trial.	1.8
12/03/2025	CR	Review valuation expert reports in preparation for trial.	2.3
12/04/2025	CR	Draft direct testimony script and related demonstratives in preparation for trial.	2.8
12/04/2025	CR	Review and compiled cross examination points in preparation for trial.	1.3
12/04/2025	CR	Review deposition transcripts in preparation for trial.	1.5
12/04/2025	CR	Review valuation expert reports in preparation for trial.	1.8
12/05/2025	CR	Draft cross examination points in preparation for trial.	1.8
12/05/2025	CR	Draft direct testimony scripts and related demonstratives in preparation for trial.	2.3
12/05/2025	CR	Review deposition transcripts in preparation for trial.	1.3
12/05/2025	CR	Review valuation expert reports in preparation for trial.	1.3
12/05/2025	RK	Review documents produced for trial preparation.	2.3
12/08/2025	CR	Draft and reviewed direct testimony outlines and exhibits.	2.5
12/08/2025	CR	Review cross examination materials in preparation for expert testimony.	2.5
12/08/2025	DM	Working session with J. Amico and D. MacGreevey (AlixPartners) re: ModivCare confirmation recap and witness preparation	1.5
12/08/2025	JA	Working session with J. Amico and D. MacGreevey (AlixPartners) re: ModivCare confirmation recap and witness preparation	1.5
12/09/2025	CR	Assist with Brown expert testimony preparation.	1.8
12/09/2025	CR	Draft and review direct testimony materials.	2.3
12/09/2025	CR	Review cross examination materials in preparation for expert testimony.	1.8
12/09/2025	DM	Working session with J. Amico and D. MacGreevey (AlixPartners) re: confirmation preparation, Magrisi and Brown testimony and demonstratives	1.5
12/09/2025	JA	Working session with J. Amico and D. MacGreevey (AlixPartners) re: confirmation preparation, Magrisi and Brown testimony and demonstratives	1.5
Total Professional Hours			**48.7**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Litigation Support & Investigations
Code: 20015424PA0001.1.13

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	3.0	$	4,380.00
Christopher Rubel	$1,225	40.4		49,490.00
Joel Amico	$1,150	3.0		3,450.00
Ryan Komendowski	$1,080	2.3		2,484.00
Total Professional Hours and Fees		**48.7**	**$**	**59,804.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	CH	Analyze mapping of legal entities and business units for claims	0.7
12/01/2025	CH	Draft analysis re: claims and material assets by legal entity	2.5
12/02/2025	CH	Analyze claim register and proofs of claim to map claims to legal entities	1.6
12/02/2025	CH	Draft analysis re: contract rejection claims and estimated claims exposure	0.7
12/02/2025	CH	Draft analysis re: estimated claims by legal entity	1.3
12/02/2025	CH	Draft analysis re: real estate lease rejection claims and estimated claims exposure	1.7
12/02/2025	CH	Draft updates to legal entity analysis to incorporate comments from J. Amico (AlixPartners)	0.6
12/02/2025	CH	Draft updates to legal entity claim analysis to incorporate revised claim estimates	0.6
12/02/2025	CH	Internal call with J. Amico, C. Hood (AlixPartners) re: claims analysis by legal entity	0.3
12/02/2025	JA	Analyze general unsecured claims and reconcile to evaluate various scenarios for Confirmation hearing	1.4
12/02/2025	JA	Internal call with J. Amico, C. Hood (AlixPartners) re: claims analysis by legal entity	0.3
12/03/2025	JA	Analyze various rejected claims and claims objections to determine impact on general unsecured claims class	1.5
Total Professional Hours			**13.2**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Claims Analysis
Code: 20015424PA0001.1.14

PROFESSIONAL	RATE	HOURS		FEES
Joel Amico	$1,150	3.2	$	3,680.00
Chase Hood	$850	10.0		8,500.00
Total Professional Hours and Fees		**13.2**	**$**	**12,180.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/01/2025	MB	Prepare for confirmation hearing	0.7
12/02/2025	MB	Prepare for confirmation hearing	0.6
12/02/2025	RK	Prepare expert materials for trial.	1.6
12/03/2025	MB	Review deposition transcripts	2.1
12/03/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	1.3
12/03/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.2
12/03/2025	RK	Prepare demonstratives for trial.	1.9
12/04/2025	MB	Prepare direct testimony	2.6
12/04/2025	MB	Review deposition transcripts	0.9
12/04/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	2.8
12/04/2025	MR	Perform valuation research re: selected publicly traded companies.	2.6
12/04/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.9
12/05/2025	MB	Analyze Jamal declaration	2.6
12/05/2025	MB	Review deposition transcript	0.8
12/05/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.5
12/05/2025	MR	Perform valuation research re: private company valuation discounts for ModivCare valuation.	2.5
12/05/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.0
12/06/2025	MB	Prepare for valuation rebuttal analysis testimony	1.7
12/06/2025	MB	Review deposition transcript	1.2
12/06/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	3.0
12/06/2025	MR	Prepare valuation materials to prepare for ModivCare confirmation hearing.	2.4
12/07/2025	MB	Review deposition transcript	1.4
12/07/2025	MB	Review valuation data	0.8
12/07/2025	MR	Prepare valuation materials to prepare for ModivCare confirmation hearing.	1.7
12/08/2025	MB	Prepare for direct testimony	2.3
12/08/2025	MB	Review expert reports	3.3
12/08/2025	MB	Review Medicare bankruptcy pleadings	1.4
12/08/2025	MB	Review rebuttal analysis	2.6
12/08/2025	MB	Review valuation support data	2.4
12/08/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.8
12/08/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	3.0
12/08/2025	MR	Perform valuation research re: selected publicly traded companies for hearing preparation.	2.3
12/08/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	0.9
12/08/2025	RK	Prepare with expert for confirmation trial testimony.	2.5
12/08/2025	RK	Review documents and analysis for confirmation trial.	3.0
12/09/2025	MB	Conduct rebuttal analysis	1.2
12/09/2025	MB	Prepare for confirmation hearing	1.0
12/09/2025	MB	Prepare trial demonstratives	1.3
12/09/2025	MB	Review deposition	1.1
12/09/2025	MB	Review expert reports	2.6
12/09/2025	MR	Analyze Jamal Declaration to prepare for ModivCare confirmation hearing.	2.5
12/09/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	1.8
12/09/2025	MR	Perform valuation research re: precedent transactions for hearing preparation.	1.6

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/09/2025	MR	Prepare valuation demonstratives for ModivCare confirmation hearing.	2.2
12/09/2025	RK	Finalization of trial demonstratives for valuation expert.	2.5
12/09/2025	RK	Prepare with expert for confirmation trial testimony.	2.6
12/10/2025	MB	Prepare for confirmation hearing	3.2
12/10/2025	MR	Perform valuation analysis to prepare for ModivCare confirmation hearing.	2.6
12/10/2025	MR	Prepare draft demonstratives for confirmation hearing closing.	1.6
12/10/2025	MR	Review Jamal Declaration to prepare for ModivCare confirmation hearing.	1.5
12/10/2025	RK	Assist counsel with preparation of closing demonstratives.	2.4
12/11/2025	MB	Conduct analysis for confirmation hearing	0.6
12/11/2025	MR	Prepare draft demonstratives for confirmation hearing closing.	1.0
Total Professional Hours			**104.6**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Valuation and Solvency Analysis
Code: 20015424PA0001.1.15

PROFESSIONAL	RATE	HOURS		FEES
Marc Brown	$1,415	38.4	$	54,336.00
Ryan Komendowski	$1,080	16.5		17,820.00
Matthew Root	$1,000	49.7		49,700.00
Total Professional Hours and Fees		**104.6**	**$**	**121,856.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/04/2025	CH	Review and provide comments to plan event scenario analysis	0.5
12/04/2025	CH	Review Debtors' certification of solicitation of votes and tabulation of ballots and related results	0.8
12/04/2025	CH	Review statement of consenting creditors in support of plan confirmation	0.7
12/05/2025	CH	Review C. Shandler declaration in support of plan confirmation	1.1
12/05/2025	CH	Review correspondence from counsel re: plan voting results	0.4
12/05/2025	CH	Review Debtors' brief in support of plan and objection to Committee standing motions	1.9
12/05/2025	CH	Review draft stipulation re: certification of voting results	0.3
12/05/2025	CH	Review Z. Jamal declaration in support of plan confirmation	1.3
12/05/2025	JA	Analyze Plan voting results and prepare summary schedules	0.8
12/05/2025	JA	Review lenders responses re UCC confirmation objection	1.3
12/05/2025	JA	Review various Debtor filings in support of Confirmation	1.5
12/05/2025	KBM	Review information re: voting results	0.7
12/05/2025	TGP	Analyze the Debtors' voting declaration and report	1.2
12/05/2025	TGP	Review analysis of voting results	0.7
12/07/2025	CH	Draft analysis re: plan voting and critical vendor payments	1.7
12/07/2025	CH	Review draft UCC standing motion reply	0.4
12/07/2025	CH	Review revised stipulation re: certification of voting results	0.3
12/08/2025	CH	Draft analysis re: voting results by class to adjust for satisfied and objected to claims	2.1
12/08/2025	CH	Review J. Lee direct demonstrative re: claim voting tabulation in advance of confirmation hearing	0.4
12/08/2025	KBM	Review Debtors' brief re: omnibus to Plan confirmation	0.9
12/08/2025	KBM	Review updates from Committee Counsel re: voting results	0.8
12/09/2025	RK	Review documents and analysis for confirmation trial.	2.6
12/10/2025	CH	Draft comparative analysis of exit facility proposal term sheets	1.4
12/10/2025	CH	Review latest exit facility term sheet received	0.5
12/11/2025	CH	Review supplemental voting tabulation and impact on plan approval	0.6
12/12/2025	DM	Review Debtors' documents in support of Plan	0.5
12/16/2025	CH	Review updated waterfall recovery analysis per the confirmed plan	0.6
12/18/2025	KBM	Review comparison of proposals compared to Plan	0.4
12/23/2025	CH	Review plan supplement re: warrants mechanics	0.6
12/23/2025	CH	Review update from counsel re: exit financing	0.3
12/29/2025	LMB	Review Effective Date Notice	0.2
Total Professional Hours			**27.5**

AlixPartners

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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: RSA, Disclosure Statement & Plan of Reorganization
Code: 20015424PA0001.1.17

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	0.5	$	730.00
Kathryn B McGlynn	$1,415	2.8		3,962.00
Joel Amico	$1,150	3.6		4,140.00
Ryan Komendowski	$1,080	2.6		2,808.00
Thomas G Prince	$950	1.9		1,805.00
Chase Hood	$850	15.9		13,515.00
Lisa Marie Bonito	$580	0.2		116.00
Total Professional Hours and Fees		**27.5**	**$**	**27,076.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/03/2025	DM	Attend ModivCare status conference	0.5
12/03/2025	KBM	Attend ModivCare status conference	0.5
12/08/2025	AP	Attend testimony of Ken Shepard NEMT CFO of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/08/2025	AP	Attend testimony of Leslie Norwalk Board Chair of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/08/2025	CH	Attend confirmation hearing (remotely)	5.1
12/08/2025	CR	Attend trial proceedings in preparation for Brown and Magrisi testimony (remotely)	1.8
12/08/2025	DM	Attend ModivCare confirmation hearing and UCC breakout sessions	8.8
12/08/2025	JA	Attend Confirmation hearing (in person)	7.0
12/08/2025	JL	Prepare materials for Magrisi hearing testimony and support	1.3
12/08/2025	KBM	Attend confirmation hearing (partial)	2.7
12/08/2025	RK	Attend confirmation hearing	6.8
12/09/2025	AP	Attend testimony of Chad Shandler (FTI) CTO of ModivCare re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/09/2025	AP	Attend testimony of Zul Jamal (Moelis) Debtors' Valuation expert witness re: Debtors' out-of-court financing, financial condition, business plan and projections	2.9
12/09/2025	CH	Attend confirmation hearing (remotely)	5.2
12/09/2025	CR	Attend confirmation hearing (remotely) in preparation for Brown and Magrisi testimony.	2.5
12/09/2025	DM	Attend ModivCare confirmation hearing and UCC breakout sessions	8.5
12/09/2025	JA	Attend confirmation hearing (in person)	7.0
12/09/2025	KBM	Attend confirmation hearing (partial)	4.4
12/09/2025	MB	Attend afternoon session of confirmation hearing	3.0
12/09/2025	MB	Attend morning session of confirmation hearing	3.5
12/09/2025	RK	Attend confirmation hearing	6.3
12/10/2025	AP	Attend testimony of Greg Magrisi (AlixPartners) re: Mr. Magrisi's rebuttal report on Debtors' business plan and projections	2.9
12/10/2025	AP	Attend testimony of Marc Brown (AlixPartners) re: Mr. Brown's rebuttal report of Debtors' business plan and projections and Mr. Jamal's valuation	2.9
12/10/2025	CH	Telephonic attendance of confirmation hearing	4.5
12/10/2025	CR	Attend trial remotely.	7.0
12/10/2025	DM	(Partial) Attend ModivCare confirmation hearing and UCC breakout sessions	4.5
12/10/2025	GM	Provide business plan testimony at confirmation hearing	3.5
12/10/2025	GM	Business Plan Rebuttal Report Testimony preparation and review of relevant documents	2.5
12/10/2025	JA	Attend confirmation hearing (in person)	6.0
12/10/2025	MB	Attend morning session of confirmation hearing	3.3
12/10/2025	MB	Provide testimony at confirmation hearing	1.8
12/10/2025	RK	Attend bankruptcy court Confirmation hearing.	4.8
12/11/2025	AP	Attend confirmation hearing (remotely)	2.9
12/11/2025	CH	Attend confirmation hearing (remotely)	3.6
12/11/2025	DM	Attend confirmation hearing (remotely)	3.7
12/11/2025	JA	Attend Confirmation hearing closing arguments	3.8

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/11/2025	KBM	Attend Confirmation hearing	2.4
12/11/2025	RK	Attend Confirmation hearing closing arguments	3.5
12/12/2025	AP	Attend confirmation ruling (remotely)	0.8
12/12/2025	CH	Attend confirmation ruling (remotely)	0.5
12/12/2025	DM	Attend confirmation ruling (remotely)	0.5
12/12/2025	JA	Attend confirmation ruling (remotely)	0.3
12/12/2025	JL	Attend confirmation ruling (remotely)	0.6
12/12/2025	KBM	Attend confirmation ruling (remotely)	0.3
Total Professional Hours			**153.1**

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Court Hearings and Status Conferences
Code: 20015424PA0001.1.18

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	26.5	$	38,690.00
Kathryn B McGlynn	$1,415	10.3		14,574.50
Marc Brown	$1,415	11.6		16,414.00
Greg Magrisi	$1,250	6.0		7,500.00
Christopher Rubel	$1,225	11.3		13,842.50
Johnny Lee	$1,225	1.9		2,327.50
Ashutosh Panda	$1,150	21.1		24,265.00
Joel Amico	$1,150	24.1		27,715.00
Ryan Komendowski	$1,080	21.4		23,112.00
Chase Hood	$850	18.9		16,065.00
Total Professional Hours and Fees		**153.1**	**$**	**184,505.50**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/02/2025	LMB	Analyze expenses for October 2025 monthly fee statement	0.8
12/02/2025	LMB	Prepare professional fees for October 2025 Monthly Fee Statement	2.2
12/02/2025	LMB	Prepare schedule/exhibit workbook for October 2025 Monthly Fee Statement	1.0
12/02/2025	LMB	Prepare Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	1.2
12/03/2025	DM	Review and comments on ModivCare October fee statement	0.7
12/03/2025	KSM	Review Second Monthly Fee Statement (October 2025)	0.3
12/03/2025	LMB	Revise Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	1.3
12/03/2025	LMB	Emails to/from D. MacGreevey (AlixPartners) re: October 2025 Monthly fee statement	0.2
12/03/2025	LMB	Finalize Second Monthly Fee Statement (October 2025), supporting schedules and exhibits	0.4
12/03/2025	LMB	Email to D. Litz (W&C) attaching the Second Monthly Fee Statement (October 2025) for filing on the Court docket	0.2
12/04/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	2.5
12/08/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	3.2
12/09/2025	CH	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	2.2
12/09/2025	CH	Continue to analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.2
12/09/2025	LMB	Prepare fee application summary chart	0.4
12/11/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.5
12/12/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	1.8
12/15/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality compliance with U.S. Trustee standards	1.5
12/15/2025	LMB	Prepare professional fees for November 2025 Monthly Fee Statement	1.8
12/15/2025	LMB	Analyze expenses for November 2025 Monthly Fee Statement	0.8
12/16/2025	CH	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality	0.9
12/16/2025	JA	Analyze professional fees for November 2025 Monthly Fee Statement for privilege and confidentiality compliance with U.S. Trustee standards	1.7
12/17/2025	CH	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	DM	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	JA	Analyze November Monthly Fee Statement for privilege and confidentiality; compliance with U.S. Trustee standards	1.3
12/17/2025	JA	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2
12/17/2025	LMB	Internal call with D. MacGreevey, J. Amico, L. Bonito, C. Hood (AlixPartners) re: November monthly fee statement	0.2

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/17/2025	LMB	Prepare Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	2.0
12/18/2025	DM	Provide comments on ModivCare November monthly fee statement	0.6
12/18/2025	JA	Revise November Monthly Fee Statement	0.5
12/18/2025	KSM	Review Third Monthly Fee Statement (November 2025),	0.3
12/18/2025	LMB	Revise Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	0.8
12/18/2025	LMB	Finalize Third Monthly Fee Statement (November 2025), supporting schedules and exhibits	0.5
12/18/2025	LMB	Email to D. Litz (W&C) attaching the Third Monthly Fee Statement (November 2025) for filing on the Court docket	0.2
12/19/2025	LMB	Revise Third Monthly Fee Statement (November 2025), supporting schedules and exhibits pursuant to comments from Counsel	0.4
12/23/2025	LMB	Update fee application summary chart	0.3
Total Professional Hours			**35.5**

AlixPartners

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Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Fee Applications & Fee Statements
Code: 20015424PA0001.1.20

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	1.5	$	2,190.00
Joel Amico	$1,150	8.5		9,775.00
Kaitlyn Sundt McClarren	$715	0.6		429.00
Chase Hood	$850	4.5		3,825.00
Lisa Marie Bonito	$580	20.4		11,832.00
Total Professional Hours and Fees		**35.5**	**$**	**28,051.00**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

DATE	PROFESSIONAL	DESCRIPTION OF SERVICES	HOURS
12/07/2025	DM	Travel from NY to Houston, TX (attend ModivCare confirmation hearing	8.0
12/07/2025	GM	Travel from Boston to Houston, TX (attend ModivCare confirmation hearing	7.5
12/07/2025	JA	Travel from Buffalo, NY to Houston, TX (attend confirmation hearing	4.0
12/07/2025	RK	Travel from Chicago, IL to Houston, TX (attend trial)	3.3
12/08/2025	MB	Travel from Chicago, IL to Houston, TX (attend confirmation hearing	0.9
12/10/2025	DM	Travel from Houston, TX to Armonk, NY (return from confirmation hearing)	6.0
12/10/2025	GM	Travel from Houston, TX to Boston, MA (attend confirmation hearing)	7.0
12/10/2025	JA	Travel from Houston, TX to Buffalo, NY (return from confirmation hearing)	4.0
12/10/2025	MB	Travel from Houston, TX to Chicago, IL (return from confirmation hearing)	4.8
12/10/2025	RK	Travel from Houston TX to Chicago, IL (return from Court hearing)	4.0
Total Professional Hours			**49.5**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Travel Time
Code: 20015424PA0001.1.31

PROFESSIONAL	RATE	HOURS		FEES
David MacGreevey	$1,460	14.0	$	20,440.00
Marc Brown	$1,415	5.7		8,065.50
Greg Magrisi	$1,250	14.5		18,125.00
Joel Amico	$1,150	8.0		9,200.00
Ryan Komendowski	$1,080	7.3		7,884.00
Total Professional Hours and Fees		**49.5**	**$**	**63,714.50**
Less 50% Travel Fees				(31,857.25)
Total Professional Fees			**$**	**31,857.25**

Exhibit B

Summary and Detailed Description of AlixPartners' Expenses

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/07/2025	Airfare Greg Magrisi 2025-12-07 ORF- CLT	519.74
12/07/2025	Airfare Ryan Komendowski 2025-12-07 ORD- IAH	623.67
12/07/2025	Airfare Ashutosh Panda 2025-12-07 EWR- IAH	418.10
12/07/2025	Airfare Joel Amico 2025-12-07 BUF- HOU	642.18
12/07/2025	Taxi/Car Service Greg Magrisi Airport to Hotel	127.27
12/07/2025	Mileage Joel Amico 48 Miles from home to airport	33.60
12/07/2025	Taxi/Car Service Ashutosh Panda IAH Airport to Hotel in Houston	114.15
12/07/2025	Taxi/Car Service Ashutosh Panda Home in NJ to Ewr airport	200.44
12/07/2025	Lodging Greg Magrisi Four Seasons Hotel, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Lodging David MacGreevey - JW Marriott, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Lodging Joel Amico JW Marriott, Houston, TX 2025-12-07 2025-12-10	1,297.53
12/07/2025	Lodging Ashutosh Panda - JW Marriott, Houston, TX 2025-12-07 2025-12-11	2,000.00
12/07/2025	Lodging Ryan Komendowski - Four Seasons Hotel, Houston, TX 2025-12-07 2025-12-10	1,500.00
12/07/2025	Individual Meal - Greg Magrisi - Lunch	31.02
12/07/2025	Individual Meal - Greg Magrisi - Dinner	23.40
12/07/2025	Individual Meal - Joel Amico - Dinner	24.40
12/07/2025	Individual Meal - Ryan Komendowski - Breakfast	5.07
12/07/2025	Individual Meal - Ryan Komendowski - Lunch	14.33
12/08/2025	Airfare Marc Brown 2025-12-08 ORD- IAH	419.49
12/08/2025	Taxi/Car Service David MacGreevey IAH Airport to Hotel	159.51
12/08/2025	Taxi/Car Service Greg Magrisi W&C office to Hotel	11.94
12/08/2025	Taxi/Car Service Greg Magrisi Hotel to W&C office	7.95
12/08/2025	Taxi/Car Service Joel Amico Houston airport to Hotel	54.00

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/08/2025	Taxi/Car Service Ryan Komendowski IAH to Hotel	93.12
12/08/2025	Lodging Marc Brown Four Seasons Hotel, Houston, TX 2025-12-08 2025-12-10	1,000.00
12/08/2025	Group Meal - David MacGreevey - Dinner - Joel Amico; David MacGreevey	150.00
12/08/2025	Individual Meal - Greg Magrisi - Dinner	75.00
12/08/2025	Individual Meal - Greg Magrisi - Breakfast	13.10
12/08/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	11.37
12/08/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/08/2025	Individual Meal - Marc Brown - Breakfast	9.43
12/08/2025	Individual Meal - Marc Brown - Breakfast	20.09
12/08/2025	Group Meal - Marc Brown - Dinner - Ryan Komendowski; Marc Brown	150.00
12/08/2025	Individual Meal - Ryan Komendowski - Breakfast	12.08
12/09/2025	Taxi/Car Service Greg Magrisi Hotel to W&C office	12.94
12/09/2025	Taxi/Car Service Marc Brown IAH to Hotel	179.35
12/09/2025	Individual Meal - Greg Magrisi - Dinner	75.00
12/09/2025	Individual Meal - Greg Magrisi - Breakfast	6.44
12/09/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	24.79
12/09/2025	Group Meal - David MacGreevey - Dinner - Joel Amico; David MacGreevey	150.00
12/09/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/09/2025	Individual Meal - Marc Brown - Dinner	75.00
12/09/2025	Group Meal - Ashutosh Panda - Lunch - Greg Magrisi; Ashutosh Panda	33.17
12/10/2025	Airfare Joel Amico 2025-12-10 IAH- BUF	526.58
12/10/2025	Airfare Marc Brown 2025-12-10 IAH- ORD	704.63
12/10/2025	Taxi/Car Service Greg Magrisi Boston to Home	72.41

AlixPartners

ModivCare Inc., et al.
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6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Re: Expenses
Code: 20015424PA0001.1.34

DATE	DESCRIPTION OF SERVICES	AMOUNT
12/10/2025	Taxi/Car Service Greg Magrisi Office to IAH	97.44
12/10/2025	Taxi/Car Service David MacGreevey Hotel to IAH Airport	145.97
12/10/2025	Taxi/Car Service Joel Amico Courthouse to Houston airport	68.42
12/10/2025	Taxi/Car Service Marc Brown Hotel to IAH	146.84
12/10/2025	Parking/Tolls Marc Brown	129.00
12/10/2025	Individual Meal - Greg Magrisi - Dinner	40.28
12/10/2025	Group Meal - Greg Magrisi - Breakfast - Greg Magrisi; Ashutosh Panda	27.23
12/10/2025	Individual Meal - David MacGreevey - Breakfast	35.00
12/10/2025	Individual Meal - Joel Amico - Dinner	54.06
12/11/2025	Airfare Greg Magrisi 2025-12-11 IAH- BOS	282.22
12/11/2025	Taxi/Car Service David MacGreevey LGA Airport to Home	330.90
12/11/2025	Taxi/Car Service Joel Amico Buffalo Airport to Home	74.30
12/11/2025	Taxi/Car Service Ashutosh Panda Houston to IAH Airport	205.66
12/11/2025	Parking/Tolls Ryan Komendowski	165.00
12/11/2025	Taxi/Car Service Ryan Komendowski Hotel to IAH	58.79
12/11/2025	Individual Meal - Greg Magrisi - Dinner	14.23
12/11/2025	Group Meal - Ashutosh Panda - Lunch - Greg Magrisi; Ashutosh Panda	32.82
12/11/2025	Individual Meal - Ashutosh Panda - Dinner	34.47
12/11/2025	Individual Meal - Ryan Komendowski - Lunch	19.18
12/12/2025	Taxi/Car Service Ashutosh Panda EWR airport to Home NJ	185.13
Total Expenses		**16,839.23**

AlixPartners

ModivCare Inc., et al.
Attn: Chad J. Shandler, Chief Transformation Officer
6900 E. Layton Avenue, Suite 1100 & 1200
Denver, CO 80237

Client: 20015424Pa0001

Expenses		**Amount**
Airfare	$	4,136.61
Ground Transportation		2,674.13
Lodging		8,797.53
Meals		1,230.96
Total Expenses	**USD**	**16,839.23**

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

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

ORDER ALLOWING INTERIM COMPENSATION
AND REIMBURSEMENT OF EXPENSES
(Docket No. ____)

The Court has considered the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 through December 29, 2025* (the "Application"), filed by AlixPartners, LLP (the "Applicant"). The Court orders:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of $5,022,757.29 for the period set forth in the Application.

2. The Debtors are authorized to disburse any unpaid amounts allowed by paragraph 1 of this Order.

Dated: _____, 2026
Houston, Texas

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

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

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

OBJECTION TO FINAL FEE APPLICATION
FILED BY WHITE & CASE, LLP

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ModivCare Topco, LLC (**"ModivCare"** or **"Reorganized Debtors"**) files this Objection to the Final Fee and Expense Request of White & Case, LLP, and would respectfully show as follows:

I. SUMMARY OF FACTS AND RELIEF REQUESTED

The Reorganized Debtors hereby object to the final fee application filed by White & Case LLP (**"White & Case"**), counsel for the Official Committee of Unsecured Creditors (the **"Committee"**), seeking $13,893,521.00 in fees and $300,469.13 in expenses for 111 days of work. White & Case was retained as a fiduciary. It did not act as one. Soon after its retention, White & Case delivered an ultimatum to the Consenting Creditors: pay $30 million to the unsecured class, or the estate professionals would generate $30 million in fees through litigation. Pay the class or pay the professionals.

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

On October 28, 2025, before the bulk of White & Case's billing occurred, the Consenting Creditors warned this Court that "the Committee's real strategy appears to be to bury the estate in exponentially expanding professional fees in order to extract an outsized settlement where it otherwise has no viable legal strategy. They identified the Committee's valuation theory as "completely unsupportable," requiring a 65% swing above the Debtors' midpoint valuation which was an impossible burden.

White & Case executed that strategy anyway. It deployed 54 timekeepers. It assigned 39 of them to review 30,000 documents. It sent 9 attorneys to the confirmation hearing and 12 to routine weekly calls. It charged a 10-22% "bankruptcy premium" above its own non-bankruptcy rates. It billed for stays at the Ritz-Carlton and Four Seasons. And it never submitted a budget.

ModivCare request the following relief, in the alternative: First, because White & Case announced in advance its intention to bury the estate in professional fees if its demands were not met and then carried out that threat through every billing category in this case, the Court should deny White & Case's Final Fee Application in its entirety under 11 U.S.C. §§ 328(c), 330(a)(4)(A), and 105(a), and award no compensation whatsoever. Second, in the alternative, the Court should drastically reduce White & Case's fees and expenses under 11 U.S.C. § 330 and equitably subordinate the remaining to the claims of unsecured creditors under 11 U.S.C. § 510(c). Third, in the further alternative, Third, the Court should drastically reduce the fees and expenses under §330.

II. JURISDICTION AND STANDING

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Reorganized Debtors have standing to object to the Final Application for Compensation at ECF No. 1290 **("Final Fee Application")** filed by White & Case, LLP (**"White & Case"**) as the party obligated to pay the fees sought. See 11 U.S.C. § 330(a)(1); Compensation Procedures Order [Docket No. 500].

III. RELEVANT BACKGROUND

3. On August 20, 2025 (the **"Petition Date"**), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

4. On September 5, 2025, the United States Trustee appointed the Committee [Docket No. 124].

5. On September 9, 2025, the Committee selected White & Case as its bankruptcy counsel.

6. On October 8, 2025, the Committee filed its *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* [Docket No. 472] (the "**Retention Application**").

7. In the Retention Application and the proposed Retention Order, the Committee represented to this Court that the retention of White & Case was necessary and in the best interest of the Debtors, their estates, their creditors, and all parties in interest.

8. On October 28, 2025, the Consenting Creditors filed a Statement [Docket No. 589] regarding White & Case's Retention Application, serving as an early warning to the Court and White & Case regarding its aggressive and abusive billing strategy (the **"Statement"**).

9. The Statement explicitly cautioned that the Committee's real strategy appears to be to bury the estate in exponentially expanding professional fees in order to extract an outsized settlement where it otherwise has no viable legal strategy.

10. The concerns raised in the Statement show that the Reorganized Debtors accurately quantified this harm in real-time, projecting that White & Case's aggressive litigation strategy would needlessly inflate total estate professional fees putting unsecured creditors further out of the money than they already were.

11. On October 31, 2025, the Court entered an order (the **"Retention Order"**) approving the Retention Application and authorizing the retention of White & Case as bankruptcy counsel to the Committee effective as of September 9, 2025.

12. The Retention Order specifically provides that White & Case shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

13. On December 15, 2025, the Court entered the *Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055] (the **"Confirmation Order"**). The Plan went effective on December 29, 2025.

14. On February 12, 2026, White & Case filed its Final Fee Application [Docket No. 1290], seeking a final allowance of $13,893,521.00 in attorney's fees and an additional $300,469.13 in expenses (the **"Fee Application"**).

IV. WHITE & CASE'S COERCIVE THREAT AND INEQUITABLE CONDUCT

15. Representatives of the Committee's professional team, including Scott Greissman, a partner at White & Case, met in person with the Debtors and the Consenting Creditors and delivered an unequivocal demand. During this meeting, Mr. Greissman insisted that $30 million

be paid to unsecured creditors and made clear that, absent such payment, the estate would incur comparable or greater sums in professional fees through sustained litigation.

16. The message was direct and unmistakable: either allocate $30 million to the class or prepare to spend it on professional fees. White & Case's threat was unambiguous: pay the class or pay us. This was not a good faith negotiation tactic. It was an extortionate proposition. The Committee's professionals were threatening to inflict massive administrative expenses upon the estate unless the Consenting Creditors capitulated to a $30 million settlement demand that the Committee's own legal theories could not independently support.

17. The threat did not occur on a single occasion. Mr. Greissman had further phone conversations with counsel for the Consenting Creditors in which he reiterated the same demand.

18. As the Consenting Creditors detailed in their Statement filed at Docket No. 589, "The Committee's real strategy appears to be to bury the estate in exponentially expanding professional fees in order to extract an outsized settlement where it otherwise has no viable legal strategy." The Consenting Creditors further noted that professional fees in these cases were projected to increase from the original DIP Budget estimate of $51 million by an additional $46 million, to a total of $91 million through the year end exit, "principally as a result of the Committee's litigation efforts."

19. The accuracy of this characterization was borne out by subsequent events. The Committee pursued discovery on the DIP financing where there was no competing alternative, litigated the UnitedHealthcare settlement motion which rested in the sound business judgment of the Debtors, and launched "extremely broad" discovery in connection with plan confirmation, all in furtherance of a completely unsupportable valuation theory. As the Consenting Creditors warned in their October 28 Statement, filed well before the bulk of the confirmation related billing occurred, the Committee's valuation theory required proving an enterprise value at least 65% higher than the

Debtors' midpoint valuation. Despite this warning, White & Case continued to generate millions in fees pursuing it. The Committee ultimately failed to prevail on its confirmation objection, and the Court confirmed the Plan on December 15, 2025.

20. The Committee's professionals, White & Case and AlixPartners combined, generated nearly $20 million in fees and expenses in less than four months, while the unsecured creditors they were ostensibly protecting received a fraction of the $30 million initially demanded.

21. The fees were not a byproduct of vigorous but reasonable advocacy. They were the direct fulfillment of the threat made at the outset: if the $30 million was not paid to the class, the professionals would ensure that the money was extracted from the estate in fees.

22. The fact that Mr. Greissman, the specific partner who made these threats, personally billed $1,027,000 over 111 days is itself powerful evidence that the threat was carried out. His billing pattern confirms it. He inserted himself into nearly every workstream in the case as a $2,500 per hour "monitor" and "reviewer," adding a supervisory billing layer on top of work already being performed by other partners who were themselves billing at $2,100 to $2,500 per hour. His $190,000 in monitoring entries alone, passively observing depositions conducted by other partners and watching hearings argued by other partners, represents precisely the kind of duplicative, non-beneficial fee generation that Section 330 was designed to prevent.

V. LEGAL STANDARD FOR ALLOWANCE OF PROFESSIONAL FEES

23. Under 11 U.S.C. § 330(a)(1), the Court may award to a professional employed under section 1103 "reasonable compensation for actual, necessary services rendered by the . . . professional person . . . and reimbursement for actual, necessary expenses".

24. Section 330(a)(3) requires the Court to consider the following factors in determining reasonable compensation:

a. the time spent on such services;

b. the rates charged for such services;

c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and

e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

25. Section 330(a)(4)(A) further provides that the Court "shall not allow compensation for . . . services that were not . . . reasonably likely to benefit the debtor's estate" or were "not necessary to the administration of the case".

26. Pursuant to Section 330(a)(4)(A), the fees related to White & Case's pursuit of hyper-aggressive discovery and litigation on issues where they had no viable legal strategy, including but not limited to the DIP financing, the UnitedHealthcare settlement, and plan confirmation, are not compensable.

27. In *Barron & Newburger, P.C. v. Texas Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015) (en banc), the Fifth Circuit overruled the prior *Pro-Snax* retrospective "actual benefit" standard and adopted a prospective "good gamble" test, holding that services are compensable if they were either "***necessary to the administration***" of the case or "***reasonably likely to benefit***" the estate "at the time at which [they were] rendered". The Fifth Circuit confirmed that the lodestar method — evaluating (1) whether the hours billed were reasonable, (2) whether the hourly rates are consistent with prevailing market rates, and (3) all other relevant equitable factors — remains the proper analytical framework.

28. Courts in the Fifth Circuit and this District have repeatedly reduced or disallowed professional fees for overstaffing, duplication of services, excessive rates, and billing for services that are not actual and necessary. See, e.g., *In re Digerati Techs*. (Bankr. S.D. Tex. 2015) (applying Woerner lodestar; reducing fees for vague entries, lumping, overstaffing, and lack of billing judgment).

29. In addition, 11 U.S.C. § 105(a) provides that the Court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title. This includes the authority to reduce or deny fees where the professional has engaged in conduct inconsistent with its fiduciary obligations or where the billing practices are so pervasive and systematic that entry by entry analysis is impractical and a percentage or categorical reduction is warranted.

VI. SYSTEMIC BILLING PRACTICES

A. UNREASONABLE RATE PREMIUM

30. White & Case asserts in its Fee Application that its requested compensation is "reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title".

31. However, White & Case's own data directly contradicts this claim and reveals that White & Case is seeking a significant "bankruptcy premium" from this estate.

a. Partner Rates: The "Committee Blended Rate" for partners in this case is $2,221 per hour.

b. Non-Bankruptcy Rates: The firm's "Non-Bankruptcy Blended Rate" for partners in the same offices during the same period is $1,816 per hour.

c. The Disparity: White & Case is charging this estate $405.00 more per hour, per partner than it charges its non-bankruptcy clients for similarly complex work.

32. Furthermore, this "bankruptcy premium" is not isolated to senior partners at White & Case; it permeates the entire staffing structure of the engagement. For example: associates bill at a blended rate of $1,169.00 per hour compared to non-bankruptcy rate of $1,063.00. In summary, White & Case has a $194.00/hr premium for counsel, $106.00/hr premium for associates, and paraprofessionals are billed at $500.00 per hour exceeding the non-bankruptcy rate of $462.00.

33. White & Case has failed to justify why the Debtors' estate should be forced to pay a 10% to 22% surcharge above the firm's standard commercial rates. This inflation of rates, combined with the "siege strategy", further proves that the $14 million fee request is designed to fulfill White & Case's initial $30 million threat rather than provide reasonable and necessary services to the estate.

B. INADEQUATE VOLUNTARY REDUCTIONS

34. In its Fee Application, White & Case attempts to demonstrate "billing judgment" by explaining that it *"voluntarily elected to reduce its fees by 377.8 hours totaling $487,911.00".*

35. While it appears that White & Case presents this as a significant concession, a mathematical analysis reveals it is a small gesture that fails to address the systemic overbilling identified in this Objection.

36. White & Case is requesting a final allowance of $13,893,521.00 in fees. Against this total, the "voluntary" reduction of $487,911.00 represents a mere 3.5% of the total fees generated. A 3.5% "haircut" is a woefully inadequate remedy for a billing record where partners routinely billed $2,500 per hour to "monitor" depositions or attend meetings with no active role.

37. Furthermore, in the Fee Application, White & Case's (a) average hourly rate for attorneys is $1,466.00; and (b) the total attorney hours covered is 9,298.0. Therefore, a reduction of only 377.80 hours, across 54 timekeepers over 111 days, amounts to a reduction of less than **4 minutes per timekeeper per day.**

38. This is not billing judgment; it is a rounding error.

39. Finally, the reductions mask the “bankruptcy premium”. As noted previously, White & Case's "Committee Blended Rate" of $1,414 is significantly higher than its "Non-Bankruptcy Blended Rate" of $1,272. White & Case explicitly states that its blended rate calculation "does not reflect the voluntary reductions made by White & Case. Even if the $487,911.00 reduction were applied to the partner rates, the partners would still be billing at a rate far exceeding the $1,816 non-bankruptcy average.

40. The "voluntary reduction" appears to be an attempt to create the illusion of restraint while the firm simultaneously extracts a 22% premium over its standard commercial rates for partner time.

C. BLOCK BILLING AND VAGUE TIME ENTRIES

41. Throughout the Fee Application, White & Case often fails to keep detailed time records and instead lumps time together. This type of “block billing" prevents the Court and parties in

interest from assessing the reasonableness of the time spent on any individual task. As a result of lumping fees, White & Case can bury tens of thousands of dollars in single-day entries that were either vague or unusually large.

42. In several instances, associates billed 10 to 13 hours in a single day with virtually no description of the specific work performed or documents reviewed.

43. Several timekeepers billed unusually long hours in a single 24-hour period, which was likely made possible by lumping together endless lists of sub-tasks. For example, on December 7, 2025, one attorney billed 18.60 in a dingle day packing 12 distinct tasks into a massive block entry that included drafting cross outlines, reviewing exhibits, reviewing liquidation research, drafting memos, and holding multiple calls for a total cost of $22,692.00.

ADMITTED CATEGORY OVERLAP

44. White & Case admits in its Fee Application that there was “extensive overlap between project categories B16 and B17. White & Case also admits in Footnote 25 that its project categories are “interconnected” and “overlap”. This is a tacit admission of "lumping" and "block billing."

45. This lack of clear boundaries makes it impossible for the Court to determine if the $2.8 million billed for Investigation (B16) is duplicative of the $4.2 million billed for Discovery (B12).

46. Furthermore, White & Case also admits in the Fee Application that “extensive overlap” exists between the category called, “Investigation of Causes of Action” and B17(Lien Challenge), suggesting the investigation lacked even a clear scope definition.

47. This overlap is a mechanism to hide “gang billing” and prevents the Court from performing the highly detail-driven review required to protect the estate.

D. OVERSTAFFED AND DUPLICATIVE EFFORTS

48. White & Case staffed this 111-day engagement with 54 unique timekeepers, including thirteen partners, and billed the estate over $14 million in less than four months. The sheer volume of attorneys deployed on virtually every task in this case is not a reflection of complexity. The overstaffing was not episodic or limited to a few isolated incidents. It was systematic, pervasive, and applied with equal force to the most consequential matters in the case and the most routine.

49. At hearings, White & Case routinely dispatched armies of attorneys to sit in the courtroom. On the first day of the DIP hearing, nine attorneys attended, including five partners billing between $1,900 and $2,500 per hour. At the confirmation hearing, as many as fourteen attorneys billed on a single day, with the estate paying over $200,000 per day for hearing attendance alone. At the UHC settlement hearing, a three-hour proceeding on an objection, eight attorneys attended.

50. The same pattern infected depositions. At nearly every deposition, the firm sent between four and seven attorneys while a $2,500 per hour partner billed thousands of dollars to passively "monitor" a deposition being conducted by another partner.

51. Drafting was no different. When White & Case drafted the Committee's Standing Motion and Complaint, twelve attorneys billed the estate over a two-day period, generating $223,004.00 in fees for a single pleading. When the firm drafted the UHC settlement objection, twelve attorneys touched the document over the course of a week. When the firm prepared its own ten-page retention application, ten timekeepers were involved, and a single associate spent 48.2 hours on what should have been a half day project at most.

52. The pattern was always the same: a junior attorney would draft, a senior associate would revise, a partner would review, a second partner would review the first partner's review, and then additional attorneys would "confer" about the result.

53. Committee meetings followed the identical model. Across eighteen formal Committee calls during the case, White & Case routinely billed for ten to twelve attorneys on a single call, including as many as six partners. In total, the estate paid $364,318 for White & Case attorneys to communicate with their own client, an amount that reflects not the complexity of the Committee's work but the number of timekeepers White & Case chose to put on the phone.

54. Even routine administrative tasks were overstaffed. Five different associates billing between $990 and $1,420 per hour updated the same internal work in progress tracker nearly every day, generating over $46,000 in fees for what amounts to maintaining an internal to do list. Eight pro hac vice motions, each requiring nothing more than a court form and a certificate of good standing, were routed through seven timekeepers at a cost of $11,365. Four attorneys, including three partners, billed $8,161 to review stay relief motions that the Committee never even contested.

55. The cumulative effect of this staffing model is staggering. When nine attorneys attend a hearing that requires two, the estate pays for seven attorneys who contributed nothing. When seven attorneys attend a deposition that requires two, five of them are billing for the privilege of observation. When twelve attorneys revise a single pleading, at least eight of them are performing duplicative work. Across every category of work in this case, White & Case applied the same formula: flood the matter with timekeepers, layer partner review upon partner review, and bill the estate for the full cost. The Retention Order required White & Case to "use its reasonable efforts to avoid any duplication of services." The billing records demonstrate that White & Case did the opposite.

VII. OBJECTIONS TO BILLING CATEGORIES

56. The Reorganized Debtors objects to each and every time entry and expense contained in the Fee Application on the grounds that White & Case's fees are the product of a coercive threat, and hereby preserve all objections under 11 U.S.C. §§ 328(c), 330(a)(3), 330(a)(4)(A), and 105(a).

57. The specific categories, entries, and examples identified below are illustrative and are not intended to constitute a complete catalog of every objectionable entry.

DIP FINANCING

58. The Committee's objection to the DIP Financing, a facility for which there was no competing alternative, served as White & Case's first major opportunity to execute its coercive billing threat.

59. White & Case assigned 18 attorneys to oppose the DIP Financing proposed by the Debtor, including 5 partners.

60. Project Code B11, which relates solely to reviewing DIP orders, negotiating with the Debtors, drafting the objection to the DIP Motion, and preparing for the contested DIP hearing, totals $828,944.00.In addition, White & Case billed for the following DIP related entries:

Project Code	Description	Dollar Amount
B12	Discovery	$218,452.00
B15	Hearing	$184,363.00
B05	Case Strategy	$28,118.00
B08	Committee Meetings	$4,709.00
B19	Travel Time	$8,556.00
B13	Hearing Exhibits	$7,548.00
	TOTAL	**$451,746.00**

61. In total, White & Case billed the estate $1,280, 690 to address DIP related issues.

OBJECTION TO CONFIRMATION

62. By the time the Committee launched its sprawling confirmation fight their legal and valuation theories were statistically and legally unsupportable. White & Case pursued the confirmation objection anyway, not because it was a "good gamble," but because a multi-day confirmation trial was the ultimate vehicle to generate millions of dollars in fees and force a settlement through attrition.

63. On October 28, 2025, in its Statement filed with the Court, the Consenting Creditors explicitly stated and identified the futility of the Committee's confirmation strategy. The Statement alerted the Court that the Committee's attempt to derail the plan was founded on a completely unsupportable valuation theory.

64. To drive a single dollar of recovery to the subordinated unsecured notes, the Committee needed to prove an enterprise value that was at least 65% higher ($545.5 million higher) than the Debtors' midpoint valuation. The Committee's ability to win this fight was impossible and that the litigation was nothing more than a "siege strategy" designed to press operationally struggling Debtors and very invested secured creditors into surrender by piling expenses onto the estate.

65. The futility of the Committee's strategy was compounded by the fact that it required simultaneously prevailing on three independent and untenable legal theories.

66. The Committee needed to prove: (a) the Debtors' midpoint valuation of $837.5 million was wrong and the Committee's doubled valuation of $1.66 billion was correct; (b) an unprecedented interpretation of Section 552 of the Bankruptcy Code that would, in the result in a paradigm shift for chapter 11 and the global secured lending markets; and (c) a complete unwinding of the Uptier Transaction including erasure of a validly executed subordination agreement.

67. If any one of these theories failed, the entire strategy collapsed. White & Case knew this when it deployed 54 timekeepers to pursue all three simultaneously.

68. Contemporaneous market data further confirmed the objective unreasonableness of the Committee's valuation theory. As of October 2025, while White & Case was generating millions in confirmation-related billing, the Debtors' First Lien Loans traded at approximately 43.7 cents on the dollar, the Second Lien Notes at 1.4 cents, and the Subordinated Unsecured Notes at less than 1 cent. At no time in 2025 had the market agreed with the Committee's valuation because none of the Debtors' secured debt instruments have traded at or near par value.

69. The market is a prospective indicator that was available to White & Case in real time and it knew that the Committee's theory was objectively unreasonable at the time the work was performed. Under Woerner, this is precisely the kind of contemporaneous evidence that demonstrates a strategy was not a "good gamble."

70. The Committee's own valuation rebuttal expert could not remember another time in his extensive experience where a Committee had presented its own view on a Debtors' enterprise value. Furthermore, the already-impossible 65% valuation hurdle was widening, not narrowing, while White & Case continued billing the estate millions of dollars per month. After the Debtors' Valuation was filed with this Court, the Debtors received additional contract terminations and notices of non-renewal from significant customers, representing a materially significant loss of revenue that impacted the valuation of the Debtors' businesses and that was not reflected in the valuation's projected revenues.

71. Every lost contract made the Committee's valuation theory less tenable. A reasonable fiduciary would have reassessed its strategy in light of these developments. White & Case instead continued to bill millions pursuing the same theory.

72. Despite this stark reality, White & Case ignored everything and unleashed a catastrophic wave of billing objecting to confirmation.

No. of Timekeepers	Task	Amount Billed
20	Draft objection to confirmation.	$522,766.00
21	Prepare for confirmation hearing	$752,505.00
14	Witness and Exhibit List	$311,785.00
10	Designate depositions	$156,561.00
11	Organizing exhibits and outlines	$937,316.00
17	Attend Confirmation Hearing	$821,666.00
8	Discovery/Depositions	$2,108,239.00
6	Travel (6 did not bill)	$57,826.00
9	Strategy for Trial	$345,379.00
	TOTAL CONFIRMATION:	**$6,014,043.00**

73. Aside from the fact that the objection to confirmation was unreasonable and not reasonably likely to benefit the estate at the time it was pursued, the other issue is the unreasonableness of the overstaffing related to confirmation. For example, 11 attorneys spent 115 hours in a single day organizing exhibits.

74. Spending over $2 million to conduct depositions can only occur when they are staffed by 7 attorneys including partners who bill at $2,500.00 an hour simply to "monitor" their partner conducting the deposition .

75. This is consistent with the fee-generation strategy: the depositions were not targeted at obtaining specific evidence to support viable claims. They were designed to generate billable hours across as many timekeepers as possible.

76. A good-faith fiduciary does not spend more than $6 million litigating an objection that requires proving an impossible 65% valuation swing. White & Case pursued the confirmation objection knowing it was futile because it provided the ultimate justification to flood the case with timekeepers and execute the $30 million threat.

UHC SETTLEMENT OBJECTION

77. White & Case's pursuit of litigating the UnitedHealthcare (UHC) Settlement is a prime example of the White & Case's scorched earth billing strategy. Without any legitimate hopes of success in opposing the UHC Settlement, White & Case billed as follows:

No. of Attorneys	Description	Amount
13	Drafting Objection, review, outlines	$61,000.00
8	Hearing	$46,000.00
10	Depo and Discovery	$58,605.00
4	Strategy Calls	$33,660.00
	TOTAL	**$199,265.00**

78. In total, 19 attorneys billed the estate regarding the UHC objection. The Committee *lost* the UHC objection at the October 30 hearing. However, White & Case spent an additional $426,328 on UHC-related work *after* the UHC objection had already failed.

COMMITTEE MEETINGS

79. White & Case billed the estate $364,318.00 to attend committee meetings. White & Case's overstaffing infected even the most routine administrative tasks, including weekly Committee update calls.

80. Across the 111-day timeline of these cases, there were at least 18 formal Committee meetings or update calls. The time records reveal a staggering pattern: rather than sending one or

two attorneys to provide updates to the Committee, White & Case routinely had 12 attorneys at a time, including up to five or six partners on a single call.

VAGUE CASE STRATEGY ENTRIES

81. White & Case billed $168,708 across 124 separate time entries in its Case Strategy category (B05) that identify no legal issue, no substantive topic, and no work product — only the names of the individuals on the call. These entries, submitted by 18 different attorneys, consist entirely of descriptions such as "Strategy call with", "Internal strategy call," "Attend W&C team strategy call," and "Weekly strategy meeting with Alix Partners."

82. Section 330(a)(3)(A) requires that fees be for "actual" and "necessary" services. The applicant bears the burden of demonstrating both. A time entry that discloses nothing more than the identity of the participants on a phone call does not permit the Court to evaluate whether the service was necessary to the administration of the case, whether it was duplicative of work performed by others, or whether the time expended was reasonable. The Court cannot determine from "strategy call with S. Greissman" whether the call concerned a matter that benefited the estate or was even related to a pending issue in the case.

83. The $168,708 represents only the portion of the Case Strategy category where no topic could be identified at all; additional Case Strategy entries that could be linked to specific workstreams — such as the DIP Financing objection, the UHC settlement objection, and the confirmation fight — are addressed in those respective sections of this objection.

PRO HAC VICE APPLICATIONS

84. White & Case billed the estate $11,365 across eight routine pro hac vice motions — one for each out-of-state attorney seeking admission to practice before this Court. A pro hac vice motion is among the most routine filings in any bankruptcy case: the attorney fills in a standard

court form with their name, bar number, and jurisdiction of admission, attaches a certificate of good standing, and files it on the docket. A competent legal assistant should be able to prepare and file each motion in ten to fifteen minutes. Eight motions, at fifteen minutes each, is two hours of work. White & Case billed 16.6 hours — more than eight times the reasonable amount — because it routed these simple forms through seven different timekeepers across multiple billing categories.

85. A $990-per-hour associate spent 0.7 hours "reviewing" the motions. A $1,370-per-hour associate "conferred" about them. A $1,110-per-hour associate "finalized and filed" one. A legal assistant spent 1.3 hours on the phone with the PACER Service Center activating a single attorney's CM/ECF account. Each motion passed through multiple hands, each of whom billed a fraction of an hour, transforming a two-hour administrative task into a $11,365 billing event.

LUXURY EXPENSES

86. The Reorganized Debtors object to the entirety of the expenses under 11 U.S.C. §105 based on the coercive threats made by White & Case.

87. In addition, Section 330(a)(1)(B) of the Bankruptcy Code limits reimbursement strictly to "actual, necessary expenses". White & Case professionals consistently opted for premium luxury accommodations and high-end services, far exceeding the reasonable standards for a bankruptcy estate. For example, partners billed the estate for numerous multi-night hotel visits at luxury hotels like the Four Seasons in Houston and the Ritz Carlton in Boston. One attorney billed the estate over $3,000.81 for three nights at a hotel in Miami.

88. Not only did White & Case bill the estate for luxury hotels, but it also billed the estate for extravagant dinners. For example, on December 11, 2025, one attorney billed $1,877.51 for a single dinner.

RETENTION APPLICATION

89. White & Case billed the estate $87,678 across 82 hours and ten separate timekeepers to prepare and file its own retention application which is a ten-page motion that consists almost entirely of boilerplate statutory disclosures required by §§327 and 328 and Bankruptcy Rule 2014.

90. A single associate, billing at $990 per hour, spent 48.2 hours and billed the estate $47,718 to draft and revise this routine filing.

91. The balance was consumed by nine additional timekeepers who reviewed, revised, conferred about, and filed what one associated had previously drafted, including two partners billing at $2,100 and $2,500 per hour and one counsel billing at $1,900 per hour.

92. Mr. Greissman, the partner who threatened to use the fee process as a vehicle to extract his demands, reviewed this ten-page retention application on four consecutive days between October 6 and October 9, billing the estate $6,500 at $2,500 per hour to read and re-read a boilerplate motion that his own associate had already drafted and that another partner had already revised.

93. In total, the three most senior timekeepers on the retention application, collectively billed $14,780, nearly all of which consisted of "reviewing" a document prepared by junior attorneys below them.

94. A retention application of this nature should require no more than two hours at most by a single associate and a reviewing partner. The $87,678 billed here reflects the same pattern of manufactured layering and duplicative review that pervades this fee application.

ASSET ANALYSIS, SALE AND DISPOSITION

95. White & Case billed $2,660.00 under the Asset Analysis, Sale and Disposition category (B02) for a single entry by Partner F. Lupinacci on December 23, 2025 for "Review of new filing re: sale." Mr. Lupinacci bills the estate at $1,900 per hour. Earlier that same month, on December 6, Mr. Lupinacci billed an additional 1.2 hours ($2,280) under the Plan and Disclosure Statement

category (B13) to review "Plan Supplement for any red flag issues." The Plan Supplement contains the very exhibits and transaction documents that would be filed in connection with any sale under the Plan, making these entries functionally duplicative work billed to two separate categories.

96. More revealing is the broader pattern surrounding the Plan Supplement itself. The Plan Supplement is a finite set of exhibit attachments to the Plan of Reorganization. White & Case billed nine separate timekeepers at rates ranging from $870 to $2,500 per hour to review this same stack of documents and then categorized the work across four different billing categories: B02 (Asset Analysis), B09 (Corporate and Securities), B13 (Plan and Disclosure Statement), and B16 (Investigation). On November 17 alone, four attorneys billed the estate to review the initial Plan Supplement, including Mr. Greissman at $2,500 per hour for "attention to Plan supplement" and Mr. Zatz at $2,100 per hour for "reviewing Plan Supplement."

97. By the time the final Plan Supplement was filed in late December, the estate had paid nine different attorneys in excess of $22,000 to read and reread the same set of documents. This is precisely the kind of category overlap and duplicative review that White & Case itself acknowledges in its Fee Application, where it admits that "certain of these categories may overlap with one another." The Plan Supplement is a microcosm of the $14 million problem: a single discrete task, fragmented across multiple billing codes and staffed with enough timekeepers to obscure the true cost of the duplication.

AUTOMATIC STAY ISSUES

98. White & Case billed the estate $8,161.00 under the Automatic Stay Issues category (B03) to review motions for relief from the automatic stay. The Committee took no position on these motions and filed no response.

99. Despite having no active role, White & Case assigned four separate attorneys to review and confer about the same filings, including three partners. Associate D. Litz initially reviewed

and summarized the stay relief motion on October 10 and conferred with Partner A. Zatz, who separately billed 0.3 hours to review the same motion on October 15. By October 23, the matter had expanded to include Partner J. Shore, who billed 0.4 hours ($1,000) for a "call re: lift stay," Partner R. Gorsich, who billed 2.5 hours ($4,750) to review and analyze the motion and confer with multiple attorneys about it, and Litz again for an additional call about the same motion. Gorsich's 2.5 hours represent 58% of the entire category, and this is his only billing entry in the entire case.

100. In total, four attorneys billed the estate $8,161 across 4.5 hours to passively monitor stay relief motions that the Committee never contested. This is a minor category in dollar terms, but it is a powerful illustration of the billing culture that pervaded this engagement. Even on a routine monitoring task requiring no Committee action, White & Case managed to involve four timekeepers, including three partners charging between $1,900 and $2,500 per hour.

FEE APPLICATIONS

101. White & Case billed the estate approximately $98,000 across 87.7 hours and twelve separate attorneys to review its own time entries, draft its own fee statements, and prepare and file its own interim and final fee applications. This is the cost the estate was asked to bear so that White & Case could bill the estate for the privilege of asking to be paid.

102. One attorney billing at $1,110 per hour, who billed approximately 45 hours across 38 entries spanning October through December. The overwhelming majority of his time consisted of a single recurring task: "Review pro forma time entries or expense entries for [month] monthly fee statement for compliance with US Trustee guidelines and other requirements, including privilege and confidentiality." He performed this review for every month of the engagement, often billing two to five hours per session, sometimes multiple sessions per week, and occasionally billing the same review task for the same month on consecutive days.

103. White & Case then routed the same time entries through a second layer of reviewers who spent an additional 8.4 hours reviewing the same pro forma entries for privilege. A third associate billing at $1,370 per hour spent 1.3 hours doing the same privilege review that the second attorney had already performed. A fourth associate billing at $1,370 per hour then spent 13.4 hours across six entries "reviewing and revising" the fee statements that had already been drafted.

104. In total, four attorneys at rates ranging from $870 to $1,370 per hour reviewed the same set of time entries in sequence, each performing a function that could have been handled by a single competent billing coordinator, or at least one associate at reasonable hourly rate.

105. The layering did not end with the associates. After the fee statements were drafted and reviewed by four associate attorneys, three additional partners and counsel reviewed them again.

106. The final fee application narrative itself was drafted by an associate who billed 7.3 hours ($9,344) on a single day.

107. The fee application process illustrates in miniature the same billing pathology that infected every other workstream in this case. A task that should have required one staff attorney to compile time entries and one associate to draft the application instead consumed twelve attorneys across three months.

EXCESSIVE CLAIMS ADMINISTRATION

108. White & Case billed the estate $44,656.00 under the Claims Administration and Objections category (B07) across 26 entries and nine separate timekeepers. The bulk of this work fell into two phases. In the first phase, during September and early October, attorneys reviewed bar date orders and proofs of claim, which is routine Committee monitoring work. In the second phase, which consumed the majority of the category, White & Case assigned two attorneys to research claim objection procedures.

109. The claim objection research is objectionable on two independent grounds. First, the duplication is self evident: two attorneys at a combined rate of $2,410 per hour conducted parallel research on identical legal issues, conferring with each other and with Partner Zatz at every step, when a single associate could have completed the work in a fraction of the time. Second, the nature of the research itself raises serious concerns.

110. White & Case holds itself out as one of the preeminent restructuring practices in the country and charges the estate rates premised on that expertise. A firm billing at these rates should not need 14.4 hours of associate time to research how to file a claim objection in bankruptcy court. These are foundational procedures that any competent bankruptcy practitioner would know without billing the estate for the education.

111. White & Case billed $44,656.00 to "review" and "analyze" proofs of claim, and researching "claim objection procedures". Reviewing claims that aren't even being litigated yet is premature, yet White & Case billed the estate for this. Furthermore, a law firm of this caliber who charges an average hourly rate of $1,414.00 should presumably know claim objection procedures, and not bill the estate to research this issue.

VIII. RELIEF REQUESTED

A. PRIMARY RELIEF: COMPLETE DENIAL OF ALL COMPENSATION UNDER §§ 328(C), 330(A)(4)(A), AND THE COURT'S INHERENT AUTHORITY

112. As its primary relief, the Reorganized Debtors respectfully request that this Court deny White & Case's Final Fee Application in its entirety and award no compensation whatsoever under 11 U.S.C. §105.

113. White & Case was retained under §1103 to serve the interests of unsecured creditors and the estate. Instead, within days of its retention, White & Case delivered an ultimatum, pay $30

million to the unsecured class or the estate professionals would generate $30 million in fees, that placed its own fee interest in direct sub with the interest of the estate it was retained to serve.

114. *Second*, Section 330(a)(4)(A) provides that the Court "shall not allow compensation for . . . services that were not . . . reasonably likely to benefit the debtor's estate" or "not necessary to the administration of the case." 11 U.S.C. § 330(a)(4)(A)(ii). As demonstrated in this Objection, White & Case's core litigation strategy was not pursued because it was reasonably likely to benefit the estate. It was pursued to execute the fee-generation threat.

115. *Third*, the Court possesses inherent authority to supervise the professionals it appoints and to deny compensation when those professionals abuse their fiduciary position. White & Case, as a court-appointed professional owes fiduciary duties to the estate and its creditors.

116. A professional who weaponizes its court-approved status to threaten the estate with $30 million in fees unless its settlement demand is met has breached those fiduciary duties in the most fundamental way. The Court's inherent authority to police its own officers provides an independent basis to deny all compensation. *See also* 11 U.S.C. § 105(a) (court may "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of" the Bankruptcy Code).

117. A professional whose entire billing record reflects the execution of an extortionate threat is not entitled to be compensated by the estate it threatened.

A. First Alternative Relief: Drastic Reduction Under §330 and Equitable Subordination of the Remaining Fees Under §510(c)

118. In the alternative, if the Court declines to deny all compensation, the Reorganized Debtors request that the Court (a) drastically reduce White & Case's fees and expenses under 11 U.S.C. § 330 and (b) equitably subordinate the remaining allowed fees under 11 U.S.C. § 510(c).

119. As detailed in this Objection, the §330 factors compel drastic reduction in every single category billed. White & Case's fees are unreasonable under §330(a)(3) because of: (a) the deployment of 54 timekeepers in a 111-day case; (b) systematic gang billing, (c) a bankruptcy rate premium of $142 per hour above the firm's own non-bankruptcy rates; (d) block billing, (e) lumped entries, and vague time descriptions that prevent meaningful review; (e) admitted overlap between billing categories; (f) failure to submit any budget despite the U.S. Trustee Guidelines' expectation of budgeting; and (g) a cost-benefit disproportion in which White & Case's fees alone consumed approximately 44% of the maximum $32 million cash-out pool.

120. The vast majority of the fees are not "reasonable" under §330(a)(3) and are not "reasonably likely to benefit the debtor's estate" under §330(a)(4)(A), and should be drastically reduced, and equitably subordinated.

Equitable Subordination

121. The Reorganized Debtors further request that the Court equitably subordinate the remaining allowed portion of White & Case's fees under 11 U.S.C. § 510(c).

122. Section 510(c)(1) of the Bankruptcy Code provides:

> [A]fter notice and a hearing, the court may — (1) under principles of equitable subordination, subordinate for purposes of distribution all or part of an allowed claim to all or part of another allowed claim or all or part of an allowed interest to all or part of another allowed interest.

123. The Fifth Circuit established the controlling framework for equitable subordination in *Benjamin v. Diamond (In re Mobile Steel Co.)*, 563 F.2d 692, 699–700 (5th Cir. 1977). Under Mobile Steel, three conditions must be satisfied:

a. The claimant must have engaged in some type of inequitable conduct;

b. The misconduct must have resulted in injury to the creditors of the debtor or conferred an unfair advantage on the claimant; and

c. Equitable subordination of the claim must not be inconsistent with the provisions of the Bankruptcy Code.

124. The *Mobile Steel* court further identified three general categories of misconduct that may warrant equitable subordination: (1) fraud, illegality, or breach of fiduciary duty; (2) undercapitalization; and (3) the claimant's use of the debtor as a mere instrumentality or alter ego. *Id*. at 700. Subsequent courts have recognized that equitable subordination may be applied to any creditor engaging in inequitable conduct, not merely insiders. See, e.g., *In re LightSquared, Inc.*, 504 B.R. 321 (BANKR. S.D.N.Y. 2013) (subordinating claims of non-insider creditor that breached implied covenant of good faith).

125. Here, A professional retained under § 1103 of the Bankruptcy Code occupies a position of trust. Committee professionals are fiduciaries to the estate and its creditors. See 11 U.S.C. § 1103(c) ("[A] committee appointed under section 1102 of this title may . . . perform such other services as are in the interest of those represented"). A committee professional that weaponizes its own fee-generating capacity to coerce settlement has engaged in inequitable conduct fundamentally inconsistent with this fiduciary obligation.

126. The $30 million threat constituted precisely the type of overreaching and coercive behavior that equity courts have long condemned. By presenting the estate with this demand— pay $30 million to the class or we will consume $30 million in fees — White & Case leveraged their privileged position as court-approved professionals to extract economic value for themselves rather than their constituents.

127. This is the functional equivalent of a "hold-up" or "siege" strategy, designed to impose costs on the estate until the other parties capitulate. The Consenting Creditors explicitly identified this tactic: the Committee's "view seems to be that it has nothing to lose and that it might as well try to press operationally struggling Debtors and very invested secured creditors into surrender by piling expenses onto the estate.

128. The inequitable nature of this conduct is underscored by the objective weakness of the Committee's underlying legal theories discussed above.

129. Despite this, White & Case pursued a course of maximum fee generation, including unnecessary discovery, and conducting extensive confirmation hearing litigation, all consistent with their original threat.

130. The injury to the Debtors' estate and its creditors is direct and quantifiable. Every dollar in professional fees approved as an administrative expense under §§ 503(b)(2) and 330 is a dollar unavailable for distribution. Moreover, White & Case derived a direct and unfair advantage from the threatened conduct: the generation of over $14 million in professional fees and expenses in less than a four-month period.

131. Equitable subordination of White & Case's fee claim is entirely consistent with the Bankruptcy Code. The Code contemplates that professionals serve the estate and its creditors, not themselves. See 11 U.S.C. §§ 330(a)(4)(A) (prohibiting fees for services "not necessary to the administration of the case"), 328(a) (authorizing retention on "reasonable terms"). Using the professional fee mechanism as a coercive bargaining weapon perverts the very purpose of §§ 327, 328, 330, and 1103. Subordinating the fees generated through such conduct vindicates the Code's requirement that professional compensation be for "actual, necessary services" and restores creditors to the position they would have occupied had the inequitable conduct not occurred.

132. The Reorganized Debtors request that the Court, under § 510(c) of the Bankruptcy Code, equitably subordinate all or a significant portion of White & Case's fee claim. To the extent the Court determines that equitable subordination under § 510(c) is not the appropriate vehicle, the Reorganized Debtors request that the Court exercise its broad equitable powers under § 105(a) and its inherent authority under § 330 to deny all requested fees or reduce White & Case's fees to account for the coercive and extortionate nature of the fee threat and the resulting litigation strategy.

133. The remedy of equitable subordination is remedial, not punitive, and should be "tailored to offset the specific harm." *In re Mobile Steel*, 563 F.2d at 701. The Court should subordinate White & Case's fee claim to the extent necessary to offset the harm inflicted on the estate — that is, the excess fees generated by the "siege strategy" that would not have been incurred had the Committee professionals pursued a reasonable, targeted, and good-faith approach to their representation.

B. SECOND ALTERNATIVE RELIEF: DRASTIC REDUCTION UNDER §330 WITHOUT SUBORDINATION

134. In the further alternative, if the Court declines to apply equitable subordination, the Reorganized Debtors request at minimum that the Court exercise its authority under 11 U.S.C. § 330 to drastically reduce White & Case's fees and expenses as discussed above.

IX. PRAYER AND CONCLUSION

WHEREFORE, ModivCare Topco, LLC respectfully requests that this Court enter an order:

1. Denying White & Case's Final Fee Application in its entirety pursuant to 11 U.S.C. §§ 328(c), 330(a)(4)(A), and 105(a), and awarding no compensation whatsoever;
2. In the alternative, drastically reducing the fees and expenses under 11 U.S.C. § 330 and equitably subordinating any remaining allowed fees under 11 U.S.C. § 510(c);
3. In the further alternative, drastically reducing the fees and expenses under 11 U.S.C. § 330; and
4. Granting such other and further relief as the Court deems just and proper, including but not limited to the disallowance of specific categories and entries identified in this Objection and any additional entries or categories identified at or before the hearing.

Date: March 5, 2026.

Respectfully submitted,

WALKER & PATTERSON, P.C.

By: */s/ Miriam T. Goott*

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CERTIFICATE OF SERVICE

I, Miriam T. Goott, hereby certify that a true and correct copy of the foregoing Objection was served electronically upon all parties entitled to notice pursuant to this Court's CM/ECF electronic noticing platform on March 5, 2026.

By:*/s/Miriam T. Goott*
Miriam T. Goott

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

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

OBJECTION TO FINAL FEE APPLICATION
FILED BY ALIXPARTNERS, LLP

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ModivCare Topco, LLC ("**ModivCare**") files this Objection to the Final Fee and Expense Request of AlixPartners, LLP, and would respectfully show as follows:

SUMMARY OF FACTS AND RELIEF REQUESTED

1. The reorganization of ModivCare Inc. and its seventy debtor affiliates (collectively, the "**Debtors**") was characterized by an aggressive, expedited timeline that saw the enterprise transition from its voluntary Chapter 11 filing on August 20, 2025, to the confirmation of its Second Amended Joint Chapter 11 Plan of Reorganization on December 15, 2025.

2. The Official Committee of Unsecured Creditors (the "**Committee**") retained AlixPartners, LLP ("AlixPartners") as its financial advisor to provide specialized expertise in valuation, business plan assessment, and litigation support.

3. In its Final Application, AlixPartners seeks total compensation and expense reimbursement of $5,022,757.29 for approximately 111 days of service as financial advisor to

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

the Committee, comprising $4,955,847.00 in professional fees, $41,910.29 in expenses, and $25,000.00 in *post-effective date* fees.

4. The final fee request should be scrutinized through the lens of the twelve factors articulated in *Johnson v. Georgia Highway Express, Inc*. and the prospective "reasonable at the time" standard established by the Fifth Circuit in *In re Woerner*. A comprehensive audit of AlixPartners' 321 pages of time records reveals a pattern of top-heavy staffing, excessive internal conferencing, the billing of clerical tasks at professional rates, and the pursuit of litigation strategies that lacked an objective prospective benefit to the estate.

5. While the Reorganized Debtors do not contest that AlixPartners performed services during the case, they respectfully submit that the fees and expenses sought are unreasonable, excessive, and insufficiently justified under the standards of 11 U.S.C. § 330 and controlling Fifth Circuit authority.

6. Specifically, the time requested in the Fee Application should be significantly reduced because: (a) AlixPartners charged hourly rates far exceeding prevailing market rates for financial advisory services in the Southern District of Texas; (b) AlixPartners engaged in systematic overstaffing and "gang billing" of routine internal coordination calls, inflating billable hours well beyond what was actual and necessary; (c) AlixPartners duplicated the services of White & Case LLP (**"White & Case"**), counsel to the Committee, in violation of the express terms of the Retention Order; and (d) AlixPartners seeks reimbursement of unreasonable expenses.

JURISDICTION AND STANDING

7. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

I. FACTUAL BACKGROUND

8. On August 20, 2025 (the "Petition Date"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

9. On September 5, 2025, the United States Trustee appointed the Committee [ECF No. 124].

10. On November 4, 2025, this Court entered the Order Authorizing the Official Committee of Unsecured Creditors to Employ and Retain AlixPartners, LLP as its Financial Advisor Effective as of September 10, 2025 [ECF No. 654] (the "Retention Order").

11. On December 15, 2025, the Court entered the *Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [ECF No. 1055] (the "Confirmation Order"). The Plan went effective on December 29, 2025.

12. On February 11, 2026, AlixPartners filed its Final Fee Application [ECF No. 1288], seeking a final allowance of $5,022,757.29 (the **"Fee Application"**).

II. LEGAL STANDARD

13. Under 11 U.S.C. § 330(a)(1), the Court may award to a professional employed under section 1103 "reasonable compensation for actual, necessary services rendered by the . . . professional person . . . and reimbursement for actual, necessary expenses".

14. Section 330(a)(3) requires the Court to consider the following factors in determining reasonable compensation:

a. the time spent on such services;

b. the rates charged for such services;

c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

e. with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

f. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

15. Section 330(a)(4)(A) further provides that the Court "shall not allow compensation for . . . services that were not . . . reasonably likely to benefit the debtor's estate" or were "not necessary to the administration of the case".

16. In *Barron & Newburger, P.C. v. Texas Skyline, Ltd. (In re Woerner)*, 783 F.3d 266 (5th Cir. 2015) (en banc), the Fifth Circuit overruled the prior *Pro-Snax* retrospective "actual benefit" standard and adopted a prospective "good gamble" test, holding that services are compensable if they were either "***necessary to the administration***" of the case or "***reasonably likely to benefit***" the estate "at the time at which [they were] rendered". However, the *Woerner* standard is not a shield for inefficiency or overzealousness. In assessing the likelihood of benefit, courts must consider the probability of success at the time of the service and the reasonable costs of pursuing that action. "Whether the services were ultimately successful is ***relevant*** to, but ***not dispositive*** of,

attorney compensation." *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d at 276 (emphasis added).

17. The Reorganized Debtors contend that AlixPartners' pursuit of a doubling of the enterprise value—from the midpoint of $837.5 million to approximately $1.66 billion—lacked objective reasonableness given the contemporaneous market trading data and the Debtors' operational realities, such as the non-renewal of material contracts. Furthermore, these "opinions" were never disclosed to the Committee for review prior to discussing them at trial.

18. The Fifth Circuit has confirmed that the lodestar method — evaluating (1) whether the hours billed were reasonable, (2) whether the hourly rates are consistent with prevailing market rates, and (3) all other relevant equitable factors — remains the proper analytical framework.[1]

19. The determination of the lodestar amount does not conclude the inquiry.[2] The court possesses broad discretion to adjust the fee award based on the *Johnson* factors, which include: (1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the professional; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship; and (12) awards in similar cases.

20. Courts in the Fifth Circuit have repeatedly reduced or disallowed professional fees for overstaffing, duplication of services, excessive rates, and billing for services that are not actual and necessary. See, e.g., *In re Digerati Techs., Inc.*, 537 B.R. 317 (Bankr. S.D. Tex. 2015)

[1] *Assadi v. Osherow (In re Assadi)*, 2025 U.S. App. LEXIS 13678, at *7 (5th Cir. 2025)
[2] *Moench v. Marquette Transp. Co. Gulf-Inland, L.L.C.*, 838 F.3d 586 (5th Cir. 2016)

(applying *Woerner* lodestar; reducing fees for vague entries, lumping, overstaffing, and lack of billing judgment); *In re 900 Corp., 327 B.R. 585* (Bankr. N.D. Tex. 2005) (court reduced fees for overstaffing, duplicative efforts, and excessive billing, emphasized the need for careful billing judgment, particularly when fees are assessed against another party, and reduced fees to protect estate assets from excessive charges.)

21. The Retention Order itself imposes a binding, affirmative obligation: "AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases" (*Retention Order* ¶ 13). AlixPartners' own Retention Application acknowledged this obligation, stating: "AlixPartners will work closely with White & Case to ensure that there will be no duplication of efforts or unnecessary overlap". (*Retention Application* ¶ 15)

III. APPLICATION OBJECTION

22. The Fee Application should be reduced for five principal reasons:

a. excessive hourly rates;

b. systemic overstaffing and internal “gang billing”;

c. duplication of White & Case’s legal services in violation of the Retention Order;

d. services that were neither reasonable nor necessary, and provided no benefit to the estate;

e. vague and lumped time entries and clerical billing; and

f. unreasonable expenses and impermissible post-effective date fees.

A. HOURLY RATES CHARGED BY ALIXPARTNERS UNREASONABLE

23. AlixPartners staffed this 111-day engagement with 34 individual timekeepers and charged the following rates:

TITLE/LEVEL	RATE RANGE	KEY EXAMPLES
Partner/Managing Director	$1,225 – $1,460/hr	MacGreevey ($1,460) McGlynn ($1,415) Brown ($1,415) Magrisi ($1,250)
Director	$715 – $1,150/hr	Panda ($1,150) Amico ($1,150) Nelson ($1,120) Gates ($1,120) Komendowski ($1,080)
Senior Vice President	$565 – $980/hr	Hood ($850) Clark ($910) Prince ($950) Cuomo ($910)
Vice President	$445 – $835/hr	Lovatto ($835) Bonito ($580) Carafi ($445)
Analyst	$535/hr	Olohan ($535)

24. The resulting blended hourly rate ranged from $1,032.83 (October) to $1,111.70 (November), with a composite average of $1,060.91 across all four months. Industry data confirms that AlixPartners already commands the highest blended hourly rate among financial advisors to unsecured creditors' committees, recorded at $1,013/hour in recent comparable cases, and the rates in this case exceed even that benchmark.

25. These rates are unreasonable under § 330(a)(3)(B) and (F) for several reasons.

B. RATES EXCEED COUNSEL'S RATES

26. Multiple AlixPartners partners billed at $1,415–$1,460/hour — rates that rival or exceed senior White & Case restructuring partners ($2,100–$2,500/hr) on a per-unit basis when one

considers that financial advisory work does not require a law license and does not carry the same professional responsibility obligations. The fact that AlixPartners Directors billing at $1,080–$1,150 per hour and SVPs billing at $850–$980 per hour exceed the rates of many experienced attorneys in this District is itself an indication of unreasonableness.

C. EXCESSIVE NUMBER OF HIGH-RATE BILLERS

27. The engagement featured 9 professionals billing at partner rates ($950–$1,460), 8 directors ($715–$1,150), and 11 SVPs ($565–$980), many of them billing substantially full-time during peak months. For example, in October alone, Ashutosh Panda (Director, rate of $1,150) billed 215.0 hours; Susan Clark (SVP, rate of $910) billed 212.3 hours; Ryan Komendowski (Director, rate of $1,080) billed 189.1 hours; and Lucas Lovatto (VP, $835) billed 162.4 hours. This staffing model is inconsistent with a reasonable, efficient engagement.

D. EXCESSIVE HOURS DUE TO SYSTEMIC OVERSTAFFING AND "GANG BILLING"

28. The time records reveal a pervasive, recurring pattern of billing large numbers of AlixPartners professionals for the same internal coordination calls. This practice dramatically inflated hours and is not the "actual, necessary" service contemplated by § 330. Examples include:

a. **October 6, 2025**: A single internal "workstreams, coordination, and next steps" call was attended by 13 AlixPartners professionals each billing 0.5 hours. Total: 7.0 hours at a blended rate exceeding $1,000/hour, generating approximately $7,700 in fees for one internal telephone call.

b. **October 7, 2025:** A similar internal coordination call involved 11 professionals with each billing 0.6 hours. Total: 6.6 hours, approximately $7,300.

c. **October 14, 2025:** Yet another internal coordination call with 11 professionals with each billing 0.5 hours. Total: 5.5 hours, approximately $5,900.

d. **October 21, 2025:** Internal "work plan and strategy" call with 12 professionals with each billing 0.7 hours. Total: 9.1 hours, approximately $10,000.

e. **October 28, 2025:** Internal "ongoing workstreams" call with 13 professionals, each billing 0.7 hours. Total: 9.1 hours, approximately $10,000.

f. **November 4, 2025:** Internal "ongoing workstreams, coordination of priority tasks, and next steps" call with 12 professionals with each billing 0.8 hours. Total: 10.4 hours, approximately $11,400.

g. **November 11, 2025:** Internal "work plan and strategy" call with 10 professionals with each billing 0.7 hours. Total: 7.0 hours, approximately $7,800.

h. **November 18, 2025:** Internal "work plan and strategy" call with 10 professionals, each billing 0.5–0.6 hours. Total: approximately 5.8 hours, approximately $6,400.

i. **December 2, 2025:** Internal "ongoing workstreams, coordination of priority tasks, and next steps" call with 8 professionals with each billing 0.4 hours. Total: 3.2 hours, approximately $3,700.

29. The foregoing is only a sample. These internal coordination calls occurred weekly or more frequently throughout AlixPartners' engagement, and each call routinely included 8–14 professionals. No reasonable basis exists for requiring 14 financial advisors on a single internal

coordination call. At most, 2–3 senior professionals should attend such calls; the remaining team members can be briefed by memorandum or brief follow-up call. The excess hours generated by this practice are conservatively estimated at 300+ hours over the course of the engagement, representing approximately $300,000–$350,000 in excessive fees.

30. The Reorganized Debtors request disallowance of all time charged by professionals in excess of 3 attendees for any internal-only AlixPartners coordination call, or alternatively, a 20% across-the-board reduction to the "Planning, Coordination and Case Management" category (101.3 hours / $116,057.50) and "Meetings/Communication with UCC and Creditors" category (256.6 hours / $306,728.50) to account for the systematic overstaffing.

E. DUPLICATION OF SERVICES

31. Paragraph 13 of the Retention Order expressly requires that "AlixPartners shall use its reasonable efforts to avoid any duplication of services provided by any of the other retained professionals in these Chapter 11 Cases". AlixPartners' own Retention Application represented that "AlixPartners will work closely with White & Case to ensure that there will be no duplication of efforts or unnecessary overlap". The time records demonstrate systematic failure to honor these obligations across multiple categories.

32. AlixPartners billed 85.5 hours for "*RSA, Disclosure Statement & Plan of Reorganization*" work, including reviewing and "providing comments" on draft confirmation objections, plan supplements, and other legal pleadings. For example, Chase Hood (SVP, $850/hr) billed 0.7 hours on November 21 to "Review initial draft of confirmation objection," 1.4 hours on November 25 to "Review and provide additional comments to further revised confirmation objection," and 1.3 hours on November 25 to "Revise and provide comments to revised confirmation objection". Reviewing, revising, and commenting on draft confirmation objections is quintessential legal work product that was White & Case's core function. White & Case billed

522.7 hours ($759,367.00) in its November and December time periods under its own "*Exclusivity, Plan & Disclosure Statement*" category for this same work. While a financial advisor may reasonably review financial aspects of plan documents, the detailed review and revision of legal briefs and confirmation objections by a financial advisor at $850/hour is duplicative.

33. AlixPartners billed 398.4 hours ($469,325.50) for "*Litigation Support / Investigations*," which the Fee Application describes as including "[c]onducted detailed investigations into the Debtors' insiders and other parties' actions prior to filing for bankruptcy" and "[r]eviewed the Debtors' advisors' reports on these actions, prepared related expert reports, and summarized findings for the Committee". White & Case simultaneously billed 382.9 hours ($523,640.00) in December alone, and substantial additional hours in November, under its own "*Investigation of Causes of Action*" category for the same underlying investigation. The combined total for investigation activities between both firms exceeded 780+ hours — an extraordinary figure for investigating pre-petition transactions in a case that ultimately did not result in any filed adversary proceedings.

34. Both firms had multiple professionals attending the same deposition preparation sessions (*e.g.*, the November 7 call where AlixPartners professionals Rubel, Amico, Komendowski, and MacGreevey attended alongside White & Case attorneys Zakia, Smith, and Chase to "prepare for ModivCare CEO deposition").

35. Both firms reviewed the same Silvers investigation report and prepared responsive analysis.

36. AlixPartners billed 201.9 hours ($240,499.50) for "Court Hearings and Status Conferences". While financial advisor attendance at certain hearings may be appropriate, the time

records reveal multiple AlixPartners professionals attending the same hearings at which White & Case was already present and advocating:

a. **September 30, 2025 (DIP Hearing):** Six AlixPartners professionals attended (MacGreevey, McGlynn, Amico, Gates, Hood, Cuomo), collectively billing 30.4 hours ($34,241.50). White & Case — which was conducting the actual litigation — also had its full trial team present.

b. **December 8–11, 2025 (Confirmation Hearing):** AlixPartners billed 153.1 hours ($184,505.50) in December for "Court Hearings and Status Conferences" alone. White & Case simultaneously had over a dozen attorneys at the confirmation hearing, billing 472.2 hours ($837,561.00) in its "Hearings & Court Matters" category. While AlixPartners' expert witness Greg Magrisi needed to attend for his testimony and one or two professionals could reasonably observe, the attendance of multiple additional AlixPartners professionals at every hearing session is unreasonable.

37. AlixPartners billed 152.4 hours ($147,204.50) for "Claims Analysis". White & Case also performed claims analysis work, billing under its "Claims Administration & Objections" categories. For example, White & Case billed 20.7 hours on claims work in November alone, including extensive research into make-whole claims and precedent claim objections. Both firms performed overlapping claims analysis during the same period.

38. Of the 215.0 hours ($228,903.50) AlixPartners billed for "DIP Financing and Cash Collateral," the vast majority (213.7 hours) was incurred in September. While the preparation of the MacGreevey declaration supporting the DIP objection was a legitimate financial advisory function, much of the remaining DIP work overlapped with White & Case's role as lead counsel

on the DIP objection. White & Case billed 57.3 hours ($99,952.00) for DIP Financing work in October alone, and substantial additional hours in September. Both firms had multiple professionals attending the same DIP hearings and breakout meetings on September 30.

F. EXCESSIVE FEE APPLICATION PREPARATION TIME

39. AlixPartners billed 83.0 hours ($60,713.00) for "Fee Statements / Fee Applications" — *i.e.*, preparing its own monthly fee statements and this final fee application. While the Supreme Court confirmed in *Baker Botts LLP v. ASARCO LLC*, 576 U.S. 121 (2015), that preparing fee applications is compensable, § 330(a)(6) requires that such compensation be "reasonable in relation to the level and skill required". Over 83 hours to prepare four monthly fee statements and one final application is unreasonable; the Fee Application itself is largely a compilation of previously filed monthly fee statements with a brief narrative.

G. AMBIGUOUS TIME WHICH LACKS SUFFICIENT DETAIL

40. Under *In re Woerner*, the burden is on the professional to show that any billed for service was a "good gamble" at the time it was made. It is impossible to assess the objective reasonableness of a "workstream" if the professional refuses to describe or identify the work being performed. Numerous entries in the application fail to meet the disclosure standards of this Circuit, including the following:

Matter 1.1.1: Planning, Coordination and Case Management

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/10/25	KBM	Prepare case set-up items	0.9	$1,415	$1,273.50
09/10/25	KBM	Email to internal team re: case workstreams and next steps	0.6	$1,415	$849.00
09/11/25	GM	Prepare for call for ModivCare re: diligence	0.3	$1,250	$375.00
09/24/25	AP	Call... re: weekly case updates and ongoing workstreams	0.6	$1,150	$690.00

09/24/25	CH	Call... re: weekly case updates and ongoing workstreams	0.6	$850	$510.00
09/24/25	CC	Call... re: weekly case updates and ongoing workstreams	0.6	$910	$546.00
09/24/25	DM	Call... re: weekly case updates and ongoing workstreams	0.6	$1,460	$876.00
09/24/25	JA	Call... re: weekly case updates and ongoing workstreams	0.6	$1,150	$690.00
09/24/25	KBM	Call... re: weekly case updates and ongoing workstreams	0.6	$1,415	$849.00
09/24/25	LL	Call... re: weekly case updates and ongoing workstreams	0.6	$835	$501.00
09/24/25	MDG	Call... re: weekly case updates and ongoing workstreams	0.6	$1,120	$672.00
09/24/25	RK	Call... re: weekly case updates and ongoing workstreams	0.6	$1,080	$648.00
09/24/25	SC	Call... re: weekly case updates and ongoing workstreams	0.6	$910	$546.00
09/24/25	TGP	Call... re: weekly case updates and ongoing workstreams	0.6	$950	$570.00
10/06/25	JA	Draft of key items and workplan required to get to Confirmation	1.1	$1,150	$1,265.00
10/06/25	Group	(12 identical entries) Call... re: ongoing workstreams and next steps	6	(Avg)	$6,720.00
10/07/25	Group	(11 identical entries) Call... re: priority tasks and next steps	6.6	(Avg)	$7,785.00
10/14/25	Group	(11 identical entries) Call... re: priority tasks and next steps	5.5	(Avg)	$6,942.50
10/21/25	Group	(12 identical entries) Call... re: strategy and next steps	8.4	(Avg)	$10,741.50
10/28/25	Group	(12 identical entries) Call... re: priority tasks and next steps	8.4	(Avg)	$10,741.50
11/18/25	Group	(8 identical entries) Call... re: strategy and next steps	4.1	(Avg)	$5,042.00
11/18/25	JA	Draft key workstream tracker and identify of update to priority deliverables	0.5	$1,150	$575.00
12/02/25	Group	(8 identical entries) Call... re: priority tasks and next steps	3.2	(Avg)	$3,706.00

Matter 1.1.9: Business and Strategic Plan

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
10/1/2025	AP	Review discovery documents for each segment	2.8	$1,150	$3,220.00

10/2/2025	AP	Review discovery documents for each segment	2.7	$1,150	$3,105.00
10/3/2025	AP	Review discovery documents for each segment	2.4	$1,150	$2,760.00
10/6/2025	AP	Review discovery documents for each segment	2.6	$1,150	$2,990.00
10/7/2025	AP	Review discovery documents for each segment	1.8	$1,150	$2,070.00
10/8/2025	AP	Review discovery documents for each segment	2.9	$1,150	$3,335.00
10/9/2025	AP	Review discovery documents for each segment	1.5	$1,150	$1,725.00
10/10/2025	AP	Review discovery documents for each segment	2.6	$1,150	$2,990.00
10/13/2025	AP	Review discovery documents for each segment	2.8	$1,150	$3,220.00
10/14/2025	AP	Review discovery documents for each segment	1.3	$1,150	$1,495.00
10/15/2025	AP	Review discovery documents for each segment	2.5	$1,150	$2,875.00
10/16/2025	AP	Review discovery documents for each segment	1.3	$1,150	$1,495.00
10/17/2025	AP	Review discovery documents for each segment	1.4	$1,150	$1,610.00
10/20/2025	AP	Review discovery documents for each segment	1.2	$1,150	$1,380.00
10/21/2025	AP	Review discovery documents for each segment	0.7	$1,150	$805.00
11/12/2025	LL	Review open business plan questions (No context)	0.3	$835	$250.50
11/14/2025	AP	Review discovery documents for each segment	1.1	$1,150	$1,265.00
11/17/2025	SC	Prepare for deposition, re: Business Plan diligence (Vague session)	2.4	$910	$2,184.00
11/20/2025	LL	Review documents and materials for deposition preparation	0.7	$835	$584.50

Matter 1.1.11: Financial and Other Diligence

DATE	PROF:	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
9/11/2025	JL	Review case filings to prepare for kick off	0.6	$1,225	$735.00
9/11/2025	JL	Review initial request list	0.6	$1,225	$735.00
9/15/2025	KBM	Review information available in data room	0.3	$1,415	$424.50

9/24/2025	KBM	Review outstanding information requests	0.4	$1,415	$566.00
10/1/2025	JA	Review various data room files and provide summary overview	0.8	$1,150	$920.00
10/3/2025	JA	Review various data room documents re prep for upcoming hearing	2	$1,150	$2,300.00
10/6/2025	MDG	Review open items on diligence list	1	$1,120	$1,120.00
10/7/2025	MDG	Review docket for various debtor filings	0.5	$1,120	$560.00
10/9/2025	KBM	Review outstanding information requests and next steps	0.6	$1,415	$849.00
10/9/2025	MDG	Review contracts in Datasite dataroom	1	$1,120	$1,120.00
10/14/2025	JA	Review historical diligence info re prior forecasts	0.5	$1,150	$575.00
11/3/2025	KBM	Review updates re: outstanding information requests	0.4	$1,415	$566.00
11/4/2025	JA	Review various data room documents re historical financial projections	0.5	$1,150	$575.00
11/6/2025	JA	Review various documents re projections per request from W&C	1	$1,150	$1,150.00
11/11/2025	KBM	Review updates re: outstanding diligence requests	0.2	$1,415	$283.00
11/13/2025	KBM	Review updates re: outstanding diligence requests	0.3	$1,415	$424.50
11/24/2025	JA	Review various claims and causes of action listed re Plan Settlement	0.6	$1,150	$690.00
12/4/2025	JA	Prepare for upcoming UCC Committee meeting (Generic prep)	0.5	$1,150	$575.00

Matter 1.20: Fee Applications & Fee Statements (Ministerial Tasks)

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
10/8/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
10/15/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
10/22/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
10/28/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
11/11/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
11/19/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00
11/25/2025	LMB	Prepare AlixPartners weekly fee estimates	0.2	$580	$116.00

12/3/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
12/9/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
12/18/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00
12/23/2025	LMB	Prepare AlixPartners weekly fee estimates	0.3	$580	$174.00

H. IMPROPER LUMPING OF TASKS

41. The U.S. Trustee Fee Guidelines highlight the requirement that each time entry describes a single, distinct task. AlixPartners' records are replete with "lumped" entries that combine disparate activities—such as internal strategy, document review, and correspondence—into a single block of time. Lumped time entries include:

Matter 1.1.1: Planning, Coordination and Case Management

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/10/25	DM	Develop ModivCare UCC work plan, strategy and related staffing	1.5	$1,460	$2,190.00
09/10/25	RK	Discussion... re: valuation work stream and staffing; Discussion... re: business plan workstream	0.2	$1,080	$216.00
09/10/25	CH	Prepare team internal datasite and email distribution group	0.9	$850	$765.00
09/11/25	CC	Complete input to work plan and diligence request lists	1.4	$910	$1,274.00
09/17/25	JL	Call... re: unencumbered assets and DIP, case updates, ongoing workstreams, and next steps	0.9	$1,225	$1,102.50
09/18/25	Group	(8 profs) Call... re: case updates and work plan	6.4	(Avg)	$6,996.00
09/24/25	Group	(11 profs) Call... re: weekly case updates and ongoing workstreams	6.6	(Avg)	$7,098.00
10/06/25	Group	(13 profs) Call... re: ongoing workstreams, coordination, and next steps	6.5	(Avg)	$7,310.00
10/07/25	Group	(11 profs) Call... re: ongoing workstreams, coordination of priority tasks, and next steps	6.6	(Avg)	$7,785.00

10/14/25	Group	(11 profs) Call... re: ongoing workstreams, coordination of priority tasks, and next steps	5.5	(Avg)	$6,942.50
10/21/25	Group	(12 profs) Call... re: ModivCare work plan and strategy and next steps	8.4	(Avg)	$10,741.50
10/28/25	Group	(12 profs) Call... re: ongoing workstreams, coordination of priority tasks, and next steps	8.4	(Avg)	$10,741.50
12/02/25	Group	(8 profs) Participate in a call... re: ongoing workstreams and next steps	3.2	(Avg)	$3,706.00

Matter 1.1.2: Meetings & Communication with UCC/Creditors

DATE	PROF.	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/16/25	Group	(12 profs) Participate in call... re: DIP objection, critical vendor, and general case updates	9.6	(Avg)	$11,028.00
09/16/25	Group	(7 profs) Participate in call... re: case status and workstreams	2.1	(Avg)	$2,247.00
09/17/25	Group	(6 profs) Call... re: unencumbered assets and DIP, case updates, and next steps	5.4	(Avg)	$6,304.50
09/18/25	Group	(8 profs) Call... re: case updates, deadlines, workstreams, and next steps	8.8	(Avg)	$10,615.00
09/20/25	Group	(3 profs: CH, CC, DM) Call... re: DIP objection, comparables, and case liquidity	2.4	(Avg)	$2,576.00
09/21/25	Group	(4 profs) Participate in a call... re: cash flow and case extension analysis	1.2	(Avg)	$1,311.00
09/22/25	Group	(6 profs) Call... re: analysis of DIP financing and declaration	4.2	(Avg)	$4,821.00
09/22/25	Group	(8 profs) Call... re: case updates and DIP objection	6.4	(Avg)	$7,316.00
10/02/25	Group	(8 profs) Call... re: updates, DIP hearing, disclosure statement, and strategy	6.4	(Avg)	$7,780.00
11/11/25	Group	(7 profs) Attend meeting... re: Committee meeting, work plan and strategy	4.9	(Avg)	$6,111.00
11/25/25	Group	(7 profs) Call... re: case updates, ongoing workstreams, and next steps	3.5	(Avg)	$4,177.50
12/04/25	Group	(11 profs) Attend meeting... re: case updates and strategy	5.5	(Avg)	$6,450.00
12/18/25	Group	(5 profs) Call... re: case updates, ongoing workstreams, and next steps	2.5	(Avg)	$3,062.50

Matter 1.1.9: Business and Strategic Plan

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/22/25	LL	Reviewed/annotated memorandums... formulated initial working hypotheses	1.2	$835	$1,002.00
09/23/25	LL	Review P&L... identified trends, adjustments, and areas requiring clarification	2.4	$835	$2,004.00
10/01/25	JL	Review data documents... and add follow up request items or status inquiry	1.4	$1,225	$1,715.00
10/02/25	LL	Conduct initial assessment...; compared plan margins to peer benchmarks	2.8	$835	$2,338.00
10/02/25	LL	Review consolidated business plan...; aligned analytical priorities with MD	2.8	$835	$2,338.00
10/03/25	LL	Analyze spend data to identify trends, cost drivers, and optimization opportunities	2.4	$835	$2,004.00
10/06/25	LL	Conduct assessment of indirect-spend... identified baseline and savings rates	2.5	$835	$2,087.50
10/07/25	LL	Analyze supplier-rationalization... flagged overlapping vendors and limited leverage	2.8	$835	$2,338.00
10/10/25	LL	Research automation call-deflection; estimated reduction and resulting FTE changes	2.6	$835	$2,171.00
10/13/25	LL	Prepare effectiveness model... estimating potential savings	2.7	$835	$2,254.50
10/13/25	LL	Prepare interview questions... for informal call with Ken Shepard	2.5	$835	$2,087.50
10/29/25	LL	Integrate initiatives into model; ensured consistency of phasing and costs	2.2	$835	$1,837.00
12/08/25	GM	** Testimony preparation with counsel (all day preparation session) **	11	$1,250	$13,750.00
12/09/25	GM	** Testimony preparation with counsel (all day preparation session) **	11	$1,250	$13,750.00

Matter 1.1.11: Financial and Other Diligence

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/11/25	CC	Create and edit diligence list across 13 week, DIP, M&A, and other categories	2.6	$910	$2,366.00
09/12/25	JA	Review background information and update to due diligence list	1.6	$1,150	$1,840.00
09/15/25	CH	Download and review new uploads to data room	1.2	$850	$1,020.00

09/19/25	CC	Review discovery files and organize associated diligence tracker	0.9	$910	$819.00
11/04/25	JA	Analyze various issues re cash collateral, sureties and letters of credit	1.2	$1,150	$1,380.00
11/04/25	JA	Draft and review of various waterfall scenarios based on different valuations	1	$1,150	$1,150.00
11/05/25	JA	Draft questions list for depositions re business plan, Q1'25 and liquidity	1.5	$1,150	$1,725.00
11/07/25	JA	Draft potential questions for depositions as well as flagging supporting documents	1.7	$1,150	$1,955.00
11/12/25	JA	Review and provide comments on UCC standing motion; follow up on requests	1.5	$1,150	$1,725.00
12/01/25	JA	Review deposition transcripts re: draft of follow up items	1.2	$1,150	$1,380.00
12/03/25	JA	Analyze filed monthly operating report re performance and payments of claims	1.1	$1,150	$1,265.00
12/04/25	JA	Analyze voting results and prepare summary based on vendors paid	1.3	$1,150	$1,495.00

Preparation of Presentations, Objections, and Testimony (Misc. Categories)

DATE	PROF	DESCRIPTION OF SERVICES	HOURS	RATE	TOTAL FEE
09/15/25	JA	Draft supporting slides and provide comments on first day motions (Category 1.1.3)	0.9	$1,150	$1,035.00
10/29/25	JA	Draft update materials including recovery scenarios and liquidity update (Category 1.1.3)	2	$1,150	$2,300.00
10/30/25	CH	Prepare demonstratives and commentary for claims analysis (Category 1.1.3)	2.2	$850	$1,870.00
11/05/25	JA	Review W&C motion and assist with providing financial inputs (Category 1.1.12)	1.5	$1,150	$1,725.00
11/23/25	JA	Review/provide comments on confirmation objection and prepare backup (Category 1.1.12)	0.8	$1,150	$920.00
12/01/25	CR	Draft direct testimony scripts and exhibits in preparation for trial (Category 1.1.13)	3.2	$1,225	$3,920.00
12/02/25	CR	Draft direct testimony scripts and related demonstratives (Category 1.1.13)	2.3	$1,225	$2,817.50
12/08/25	DM	Session re: confirmation recap and witness preparation (Category 1.1.13)	1.5	$1,460	$2,190.00

I. CLERICAL AND MINISTERIAL TASKS

42. Professionals are prohibited compensation for "essentially clerical or secretarial work," regardless of whether the person performing the task is a professional. Such tasks are considered overhead, and their cost should be absorbed by the firm's hourly rates. The AlixPartners time records contain numerous entries where highly compensated professionals billed the estate for ministerial work. Below are some examples:

a. **Case Setup and Administration:** On September 10, 2025, Kathryn B. McGlynn (Managing Director, $1,415/hr) billed 0.9 hours to "Prepare case set-up items." Setting up an internal project file is a basic administrative function that does not require the expertise of a managing director.

b. **Data Room and Distribution List Management:** Chase Hood (SVP, $850/hr) billed 0.8 hours on September 10, 2025, and another 0.8 hours on September 11, 2025, to "Prepare team internal datasite and email distribution group." Additionally, on September 10, 2025, Hood billed 0.8 hours to "Prepare working group list for counsel."

c. **Fee Application Preparation:** Lisa Marie Bonito (VP, $580/hr) billed 62.3 hours in Category 1.20 (Fee Applications & Fee Statements).1 While some time for fee application preparation is compensable, over 60 hours for a reorganization that lasted less than four months is excessive. Much of this time was spent on repetitive tasks such as "Analyzing professional fees… for privilege and confidentiality" and "Preparing schedule/exhibit workbook".

43. The practice of billing the estate at professional rates—up to $1,415 per hour—for managing email distribution lists and formatting data rooms is inherently unreasonable. The Reorganized Debtors submit that these entries should be disallowed in their entirety.

J. UNREASONABLE EXPENSES

44. AlixPartners seeks $41,910.29 in total expenses. The Reorganized Debtors object to the following categories of expenses:

a. **Excessive Research Reports:** In October 2025 alone, AlixPartners purchased three third-party market research reports totaling $9,400.00: "US Home Care Services Market Outlook" ($2,000.00), "US Remote Patient Monitoring Market Outlook" ($4,950.00), and "US Non-Emergency Medical Transportation Market to 2031" ($2,450.00). When combined with $2,253.63 in September research costs (including $1,210.10 and $893.53 for additional industry research reports), AlixPartners charged the estate $11,973.63 for "Client Research". The necessity of nearly $12,000 in off-the-shelf industry research reports has not been demonstrated, particularly where AlixPartners presumably already possesses expertise in the healthcare and transportation sectors that justified its retention.

b. **Luxury Lodging:** In October 2025, the expense records reflect $1,500/person for two nights at New York City hotels (Westin Grand Central and Benjamin Royal Sonesta) for Amico and Komendowski — while traveling to ***AlixPartners' own New York office at 909 Third Avenue***. The Reorganized Debtors question why the estate should bear

lodging costs for AlixPartners professionals traveling to their firm's own headquarters.

c. In November 2025, lodging totaled $3,000.00, and in December 2025, lodging totaled $8,797.53 — the highest single expense category in December.

K. POST-EFFECTIVE DATE FEES

45. AlixPartners requests an additional $25,000.00 for "fees incurred or expected to be incurred *after the Effective Date* . . . in connection with the preparation and prosecution of this final Application". The Retention Order, at Paragraph 5, provides that "AlixPartners shall not seek reimbursement from the Debtors' estates for any fees incurred in defending any of AlixPartners' fee applications in these Chapter 11 Cases". To the extent the $25,000.00 includes any fees for defending this Fee Application against objections, such fees are expressly prohibited. AlixPartners should be required to submit an itemized statement of actual post-effective date fees incurred, limited strictly to preparation (not defense), before any allowance is granted.

PRAYER

WHEREFORE, ModivCare, respectfully prays that the Court deny the requested fees and for such other and further relief as the Court deems just and proper.

Date: March 4, 2026.

Respectfully submitted,

WALKER & PATTERSON, P.C.

By: */s/ Johnie Patterson*

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COUNSEL FOR MODIVCARE

CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Objection was served electronically upon all parties entitled to notice pursuant to this Court's CM/ECF electronic noticing platform on March 4, 2026.

By: */s/ Johnie Patterson*
Johnie Patterson

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

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

ORDER ON OBJECTION TO FINAL FEE APPLICATION FILED BY ALIXPARTNERS, LLP
[Relates To ECF No. _____]

It is

ORDERED that the Fees requested by AlixPartners, LLP are disallowed, and it is further

ORDERED that the Expenses requested by AlixPartners, LLP are disallowed.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

[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.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

United States Bankruptcy Court
Southern District of Texas
ENTERED
April 30, 2026
Nathan Ochsner, Clerk

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

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

ORDER REQUIRING THE REORGANIZED DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT

In connection with consideration of *White & Case LLP's Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the "W&C Application"), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the "AlixPartners Application" and, together with the W&C Application, the "Applications"); and in accordance with the Court's rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court Registry"), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

in the Applications, including $628,727.58 in connection with the W&C Application and $1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. This is a final order.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: April 30, 2026

Alfredo R Pérez
United States Bankruptcy Judge

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

In re:	§	
	§	
MODIVCARE, INC., *et al.,*	§	Case No. 25-90309 (ARP)
	§	Chapter 11
Reorganized Debtors.	§	(Jointly Administered)
	§	Judge Alfredo R. Pérez

MODIVCARE TOPCO, LLC'S EMERGENCY MOTION FOR RECONSIDERATION OF (I) ORDER BIFURCATING LEGAL AND FACTUAL ISSUES AND (II) ORDER REQUIRING DEPOSIT OF FUNDS INTO COURT REGISTRY

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ModivCare Topco, LLC ("**TopCo**" or the "**Reorganized Debtor**") respectfully moves for reconsideration of two orders announced at the April 6, 2026 status conference in connection with the Objection to White & Case LLP's Final Fee Application and AlixPartners' Final Fee Application: (I) the Order Bifurcating Legal and Factual Issues (the "**Bifurcation Order**"), and (II) the Order Requiring Deposit of Funds into the Court Registry (the "**Escrow Order**" and, collectively with the Bifurcation Order, the "**Orders**"). In support, TopCo respectfully shows the Court as follows:

JURISDICTION AND STANDARD OF REVIEW

1. This Court has jurisdiction under 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (B). Venue is proper under 28 U.S.C. § 1409.

2. A bankruptcy court possesses inherent authority to reconsider its interlocutory orders at any time before entry of final judgment. *See Melancon v. Texaco, Inc.*, 659 F.2d 551, 553 (5th Cir. 1981) ("[A] district court has broad discretion to reconsider and modify its interlocutory orders any time prior to final judgment."). Where, as here, a party identifies "a manifest error of law or fact" or a "clear error" in the court's reasoning, reconsideration is appropriate. *See Livingston Downs Racing Ass'n, Inc. v. Jefferson Downs Corp.*, 259 F. Supp. 2d 471, 475 (M.D. La. 2002). A motion to reconsider is also warranted where the court's order rests on an "erroneous legal standard." *Simon v. United States*, 891 F.2d 1154, 1159 (5th Cir. 1990).

BASIS FOR EMERGENCY RELIEF

3. Emergency consideration is warranted because the proposed Escrow Order will necessarily set a compliance deadline requiring TopCo to transfer approximately $1.644 million into the Court's registry. TopCo requests consideration prior to any deadline passing. Absent emergency consideration, TopCo faces the choice of complying with an order it contends is legally infirm or risking contempt.

SUMMARY OF RELIEF REQUESTED

4. TopCo recognizes and respects this Court's broad authority to manage its docket. This motion does not challenge that authority. It respectfully submits that both Orders, as

announced, exceed the bounds of what the Bankruptcy Code, the Federal Rules, Fifth Circuit precedent, and the Due Process Clause permit.

5. *The Bifurcation Order.* The Bifurcation Order purports to resolve "legal issues" in a first phase before any evidentiary hearing. This conflicts with Federal Rule of Bankruptcy Procedure 9014(d)'s mandatory directive that testimony on disputed material factual issues "must be taken in the same manner as testimony in an adversary proceeding." It also contravenes the Fifth Circuit's categorical rule, most recently reaffirmed in *In re Assadi*, 2025 U.S. App. LEXIS 13678 (5th Cir. June 4, 2025), that an evidentiary hearing is mandatory when fee-application objections raise disputed material facts.

6. *The Escrow Order.* The Escrow Order commands TopCo to affirmatively transfer approximately $1.644 million of its own funds into the Court's registry before a single dollar of professional fees has been finally and judicially allowed under 11 U.S.C. § 330. That is a ***mandatory injunction***—among the most disfavored forms of equitable relief in the Fifth Circuit—which may issue only upon a showing of "clear entitlement" to relief under the facts and the law. *Justin Indus., Inc. v. Choctaw Sec., L.P.*, 920 F.2d 262, 268 n.7 (5th Cir. 1990). No party moved for this order. It was entered *sua sponte* at a status conference without an evidentiary record, without a showing of irreparable harm, and without a finding of a clear entitlement and likelihood of success on the merits. Moreover, no provision of the Bankruptcy Code authorizes such relief: Section 105(a) cannot be used to compel payment of fees not yet allowed under § 330. *Law v. Siegel*, 571 U.S. 415 (2014).

7. TopCo respectfully requests that the Court reconsider, and: (1) deny/vacate the Escrow Order in its entirety; and (2) deny/vacate the Bifurcation Order and set a single, unified

evidentiary hearing at which all issues, legal and factual, are addressed on a complete record after a reasonable time for discovery.

RELEVANT BACKGROUND

8. On February 11, 2026, AlixPartners, LLP, ("**AlixPartners**") filed its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 10, 2025 Through December 29, 2025 [ECF No. 1288] (the "**AlixPartners Fee Application**"), seeking allowance of approximately $5 million in fees and expenses.

9. On February 12, 2026, White & Case, LLP ("**White & Case**") filed its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025 [ECF No. 1290] (the "**WC Fee Application**"), seeking allowance of approximately $14 million in fees and expenses. Collectively, the AlixPartners Fee Application and the WC Fee Application are referred to as the "**Fee Application**".

10. On March 4, 2026, TopCo filed its Objection to the AlixPartners Fee Application [ECF No. 1351] (the "**AlixPartners Objection**"). On March 5, 2026, TopCo filed its Objection to the WC Fee Application [ECF No. 1354] (the "**WC Objection**" and collectively with the AlixPartners Objection the **"Objection"**). The Objection presents three tiers of alternative relief: (a) complete denial of fees under § 328(c); (b) reduction and equitable subordination under §§ 330 and 510(c); and (c) reduction under § 330 alone. Each tier depends on the same core factual record: the alleged $30 million demand made by White & Case partner Scott Greissman; White & Case's subsequent execution of that demand through its billing practices; and specific, granular challenges to the reasonableness and necessity of more than $14 million in fees billed by 54 timekeepers over 111 days.

11. Following the Objection, TopCo served narrowly tailored document requests (the "**RFPs**") directed to those factual issues to White & Case. White & Case refused to produce a single document absent a court order.

12. On April 3, 2026, TopCo filed a Motion to Compel [ECF No. 1409]. The same day, White & Case filed its Reply [ECF No. 1410] (the "**Reply**"), in which, without filing a separate motion, it requested that the Court address purportedly "legal" issues first and defer or preclude factual development. AlixPartners, LLP filed its own Reply [ECF No. 1411].

13. On April 6, 2026, the Court held a status conference and *sua sponte*: (a) ordered bifurcation of the hearing into Phase 1 ("legal issues") and Phase 2 ("factual issues"); and (b) indicated its intent to require TopCo to deposit all disputed amounts, approximately $628,727.58 related to White & Case and $1,016,169.40 related to AlixPartners, into the Court's registry.

14. On April 8, 2026, White & Case circulated proposed orders memorializing both rulings. The proposed Escrow Order sets an April 10, 2026 compliance deadline—affording TopCo only days to transfer $1.644 million without any prior motion, briefing, or evidentiary hearing.

ARGUMENT

THE BIFURCATION ORDER VIOLATES THE BANKRUPTCY CODE, THE FEDERAL RULES, AND FIFTH CIRCUIT PRECEDENT.

A. The Bankruptcy Code and Rule 9014 Mandate an Evidentiary Hearing.

15. Section 330(a)(1) provides that the court may award reasonable compensation only "[a]fter notice to the parties in interest and the United States Trustee and a hearing." 11 U.S.C. § 330(a)(1). Section 102(1)(B)(i) provides that the court may act without an actual hearing

only if a hearing "is not requested by a party in interest." TopCo has affirmatively requested a hearing.

16. Federal Rule of Bankruptcy Procedure 9014 governs contested matters, including fee-application objections. The Advisory Committee Notes confirm: "If a party in interest opposes the amount of compensation sought by a professional, there is a dispute which is a contested matter." Rule 9014(d) then provides in mandatory terms: "A witness's testimony on a disputed material factual issue must be taken in the same manner as testimony in an adversary proceeding." FED. R. BANKR. P. 9014(d) (emphasis added). The 2002 Advisory Committee Notes reinforce: "if the motion cannot be decided without resolving a disputed material issue of fact, an evidentiary hearing must be held." The rule is mandatory, not permissive.

B. Fifth Circuit Precedent Categorically Requires an Evidentiary Hearing When Material Facts Are Disputed.

17. In *In re U.S. Golf Corp.*, 639 F.2d 1197, 1202 (5th Cir. 1981), the Fifth Circuit categorically held that "the judge must hold an evidentiary hearing if there are any disputed factual issues" when determining attorneys' fees in bankruptcy. This holding was reaffirmed in *In re First Colonial Corp. of America*, 544 F.2d 1291, 1300 (5th Cir. 1977).

18. *In re Assadi*, 2025 U.S. App. LEXIS 13678 (5th Cir. June 4, 2025), reaffirmed the *U.S. Golf Corp.* mandate. The court upheld denial of an evidentiary hearing *only* because the *pro se* objector had raised exclusively legal challenges "concern[ing] the legal conclusions the court should draw from the record", without asserting "disputed factual issues that would benefit from 'testimony of witnesses.'" *Id.* at *3. This case is the polar opposite. TopCo's Objection identifies, with specificity, more than a dozen categories of disputed

billing conduct—including the alleged $30 million demand, systemic overstaffing, and specific unreasonable billing entries, each of which requires witness testimony to resolve. *Assadi* thus supports, rather than undermines, TopCo's entitlement to an evidentiary hearing.

19. In *Sylvester v. Chaffe McCall, L.L.P. (In re Sylvester)*, 23 F.4th 543, 549 (5th Cir. 2022), the Fifth Circuit vacated a fee award because the court below failed to require the applicant to affirmatively prove each element of its fee request upon the filing of an objection. A bifurcation procedure designed to preemptively foreclose the evidentiary hearing would relieve White & Case of that burden—the antithesis of what *Sylvester* commands. The Supreme Court's treatment of contested fee applications confirms this expectation: in *Baker Botts L.L.P. v. ASARCO LLC*, 576 U.S. 121, 125 (2015), the bankruptcy court conducted "extensive discovery and a 6-day trial" on contested fee applications before ruling on objections—a procedure the Supreme Court treated as the unquestioned baseline.

C. Every Issue White & Case Labels "Legal" Requires Factual Findings.

20. The Phase 1 issues identified in the Bifurcation Order are not genuinely separable from the factual record:

21. Standing. The Fifth Circuit has developed a structured approach to jurisdictional challenges, including standing, under Rule 12(b)(1). *Williamson v. Tucker*, 645 F.2d 404 (5th Cir. 1981), which established that a district court may find lack of subject matter jurisdiction based on any one of three separate bases: (1) the complaint alone; (2) the complaint supplemented by undisputed facts *evidenced in the record*; or (3) the complaint supplemented by *undisputed facts* plus the court's resolution of disputed facts. *Williamson v. Tucker*, 645 F.2d at 413 (emphasis added).

22. However, it is unclear whether the Court's oral statements questioning "standing" reflect a question of Article III standing and/or prudential standing, further confusing the necessary proof/evidence that may be required. See *Abraugh v. Altimus*, 26 F.4th 298, 303-04 (5th Cir. 2022) (Not being a proper plaintiff does not defeat Article III standing. "[S]tanding in federal court is determined entirely by Article III and depends in no degree on whether standing exists under state law.") (citations omitted)

23. The "standing" issue is also clearly dependent on factual questions, as indicated by the Court itself. The Court indicated that after conducting an independent review of the reorganized Debtor's corporate documents, the Court itself indicated it had fact questions.

24. "Standing" (Article III and prudential) also raises an additional factual issue – is TopCo liable at all for any fee award? If there is liability, there must be standing under either analysis. And, the Court has apparently determined that there is liability by indicating it would enter the Escrow Order against TopCo requiring it to deposit disputed funds, predetermining liability.

25. Rule 408 Applicability. Before determining whether Rule 408 shields Mr. Greissman's statements, the Court must find whether those statements were made "in the course of compromise negotiations concerning a disputed claim." FED. R. EVID. 408(a). TopCo alleges they were not offers of compromise but unilateral threats—a disputed factual issue. The Court must also address Rule 408(b) exceptions, including whether the statements are admissible to show the bias, motive, and context for the billing patterns that followed. Moreover, Mr. Greissman reiterated the same demand in separate communications with the Consenting Creditors' counsel outside any settlement context; whether those communications fall within Rule 408 is a factual question requiring testimony. Neither

Ramada Development Co. v. Rauch, 644 F.2d 1097 (5th Cir. 1981), nor *Blu-J, Inc. v. Kemper C.P.A. Group*, 916 F.2d 637 (11th Cir. 1990)—the cases on which White & Case principally relies—involved a fiduciary who allegedly threatened to impose harm on the estate it was obligated to serve.

26. The Woerner "Good Gamble" Inquiry. The Fifth Circuit's *en banc* decision in *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 783 F.3d 266, 274 (5th Cir. 2015), requires the Court to assess whether services were "reasonably likely to benefit the estate" *at the time they were rendered*—a prospective, fact-intensive inquiry into what the professionals knew, what alternatives existed, and why they chose to proceed as they did. This cannot be resolved on a paper record.

27. Section 330 Reasonableness Factors. The statutory factors under § 330(a)(3)—including time spent, rates charged, necessity, and reasonableness—are explicitly factual. The Court cannot discern from billing records alone why seven attorneys attended a single deposition, why multiple timekeepers reviewed a routine *pro hac vice* application, or why 54 timekeepers were deployed over 111 days. That inquiry requires testimony about staffing decisions, delegation, and billing judgment.

28. White & Case's Fee-Comparison Theory. White & Case devotes substantial portions of its Reply to comparing its fees with those of Latham & Watkins LLP. This comparison, raised by White & Case, not TopCo, is itself fact-intensive. Whether the work performed by the two firms was truly comparable, whether Latham's undisclosed pre-petition fees distort the comparison (White & Case's own Reply concedes they were "most likely substantial"), and whether Latham's approval without objection establishes a reasonableness benchmark are factual questions requiring evidence.

29. Section 328(a) Pre-Approval. The Order Authorizing Employment (the "Order") *refers* to Section 328, with White & Case suggesting that the mere reference locks in billing *rates.* However, the Order of Employment goes on to explicitly say that all fee applications are subject to sections 330 and 331, and the Order clearly does not immunize the *volume* of hours billed, the number of timekeepers deployed, or the reasonableness of specific services from § 330 scrutiny. These remain inherently fact-intensive inquiries. White & Case's Reply first assumes just the mention of 328 somehow creates pre-approval on final application of their rates, and compounds the assumption by suggesting by arguing that the supposed prior approval of its rates forecloses any challenge to its fees. *See* Reply ¶ 34.

D. Bifurcation Contravenes Rule 42(b)'s Efficiency Requirement.

30. Federal Rule of Civil Procedure 42(b), applicable through FED. R. BANKR. P. 9014(c), permits bifurcation only "for convenience, to avoid prejudice, or to expedite and economize." *See Lindsey v. Prive Corp.*, 161 F.3d 886, 892 (5th Cir. 1998). Bifurcation accomplishes the opposite here. Because every Phase 1 "legal" issue either requires factual predicate findings or will not eliminate Phase 2, the parties will brief the same issues twice—first on an incomplete record, then again after discovery and evidence are presented. This multiplies cost, burden, and delay.

31. Bifurcation also risks unfair prejudice by fragmenting a fact-dependent record. The Objection presents a unified factual narrative—that White & Case adopted a strategy to generate excessive fees and executed it across multiple workstreams. Preliminary rulings on a limited record may shape and constrain the scope of Phase 2, preventing TopCo from presenting the full context necessary for a fair adjudication.

E. Section 105(a) Cannot Override the Evidentiary Hearing Requirement.

32. To the extent the Bifurcation Order rests on § 105(a), that foundation fails for the same reasons that defeat the Escrow Order. *Law v. Siegel* and *NexPoint Advisors* foreclose the use of § 105(a) to override the specific evidentiary-hearing mandate of Rule 9014(d) and § 330(a)(1).

F. The Consenting Creditors' Own Contemporaneous Statements Confirm the Factual Nature of This Dispute.

33. White & Case invokes the confirmation proceedings as establishing that the Committee's litigation was reasonable. But confirmation addressed whether the Plan satisfied § 1129—not whether the fees incurred in litigating those matters were reasonable when incurred. The Consenting Creditors' Statement filed on October 28, 2025 [ECF No. 589]—filed by the parties who now control TopCo—explicitly warned in real time that the Committee's strategy was to "bury the estate in exponentially expanding professional fees." Whether that contemporaneous assessment was accurate, and whether White & Case's subsequent billing patterns bear it out, are classic questions of fact requiring witness testimony.

A SINGLE, UNIFIED EVIDENTIARY HEARING IS THE ONLY LAWFUL AND EFFICIENT RESOLUTION.

34. The Objection identifies, with particularity, more than a dozen categories of disputed billing conduct totaling millions of dollars in a $14 million fee request. These are not abstract legal arguments; they are specific, fact-intensive challenges requiring witness testimony, documentary evidence, and cross-examination. A unified evidentiary hearing—with targeted discovery first is the procedurally sound, efficient, and constitutionally compliant method of resolving this dispute.

35. The Fifth Circuit's mandate in *In re U.S. Golf Corp.*, 639 F.2d at 1202, and its progeny leave no room for a procedure designed to foreclose that hearing. This Court's broad discretion to manage its docket, while fully respected, does not extend to denying a party its right to an evidentiary hearing when the Bankruptcy Code, the Federal Rules, and the Constitution require one.

THE ESCROW ORDER IS A MANDATORY INJUNCTION ENTERED WITHOUT LEGAL AUTHORITY OR THE REQUISITE SHOWING.

The Escrow Order Compels Affirmative Action and Is Therefore a Mandatory Injunction.

36. The distinction between prohibitory and mandatory injunctions is dispositive, not semantic. A prohibitory injunction restrains a party from acting and preserves the *status quo*. A mandatory injunction compels affirmative action, altering the existing state of affairs. The classification determines the applicable legal standard.

37. An Escrow Order does not preserve the *status quo*. It predetermines liability and commands TopCo to *affirmatively transfer* approximately $1.644 million of its own funds into the Court's registry before a single dollar of fees has been judicially allowed under 11 U.S.C. § 330. The characterization of the order as an "escrow" or "deposit" does not alter the analysis; substance, not label, controls. *See Savage Tavern v. Stag,* 589 F. Supp. 3d 624, 639 (N.D. Tex. 2022) (Mandatory injunction "mandates" a party to take some action inconsistent with the status quo rather than prohibiting them from altering the status quo.).

The Fifth Circuit Imposes a "Clear Entitlement" Standard on Mandatory Injunctions.

38. In *Justin Industries, Inc. v. Choctaw Securities, L.P.*, 920 F.2d 262, 268 n.7 (5th Cir. 1990), the Fifth Circuit held that a party seeking a mandatory injunction "bears the burden of showing a ***clear entitlement*** to the relief under the facts and the law." (emphasis added).

This standard is categorically more demanding than the "substantial likelihood of success" test applied to prohibitory injunctions. *Exhibitors Poster Exch., Inc. v. Nat'l Screen Serv. Corp.*, 441 F.2d 560, 561 (5th Cir. 1971) ("Nevertheless, when a plaintiff applies for a mandatory preliminary injunction, such relief 'should not be granted except in rare instances in which the facts and law are clearly in favor of the moving party.'")(cleaned up).

39. The Supreme Court reinforced in *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 24 (2008), that injunctive relief is "an extraordinary and drastic remedy" that is "never awarded as of right." *Winter* requires a clear showing on all four elements: (1) likelihood of success on the merits; (2) likelihood of irreparable harm; (3) the balance of equities favors the movant; and (4) an injunction serves the public interest. For a mandatory injunction, each factor must be demonstrated by clear and unambiguous evidence.

None of the Winter Factors Is Satisfied.

40. No party moved for the Escrow Order. It was determined *sua sponte* at a status conference without prior notice, without briefing, and without any evidentiary record bearing on the four *Winter* factors.

41. *No likelihood of success on the merits.* The Escrow Order presupposes that White & Case and AlixPartners are entitled to the disputed sums and that TopCo is liable. The liability element even more suspect when at the same hearing the Court questions TopCo's "standing". But fee allowance under § 330 is not ministerial—it requires a judicial determination that fees were reasonable and necessary. TopCo's Objection raises specific, detailed factual challenges that the Court has not yet evaluated. The outcome of this dispute is supposed to be uncertain, uncertain until the Court hears, weighs and determines the

factual record. White & Case cannot demonstrate "clear entitlement" to funds that have not been allowed.

42. *No showing of irreparable harm.* No evidence has been presented that TopCo lacks the ability or willingness to pay fees ultimately allowed. There is no allegation, let alone proof, of insolvency, asset dissipation, or collection risk. Irreparable harm cannot be presumed; it must be proven. *See Janvey v. Alguire*, 647 F.3d 585, 600 (5th Cir. 2011). This failure is independently fatal.

43. *The balance of equities favors TopCo.* Requiring the transfer of approximately $1.644 million into the Court's registry imposes immediate, concrete, and potentially prolonged harm. If this matter is appealed - a realistic prospect whatever the outcome - those funds could remain frozen through proceedings in the District Court and the Fifth Circuit for years. White & Case, by contrast, suffers no legally cognizable harm from awaiting the orderly conclusion of a contested judicial process. Its retention was approved; it was paid interim fees; and it has no present entitlement to the disputed amounts.

44. *The public interest weighs against the order.* Upholding this order would establish precedent that a reorganized debtor may be compelled to deposit disputed holdback amounts into the court's registry before its fee objection is heard on the merits. This would substantially chill good-faith fee objections, one of the few mechanisms Congress provided to police professional compensation in bankruptcy, and would effectively convert unapproved fee applications into pre-approved claims immune from meaningful review.

NO STATUTORY AUTHORITY EXISTS FOR THE ESCROW ORDER.

Section 105(a) Cannot Supply the Missing Authority.

45. The only conceivable statutory basis for the Escrow Order is 11 U.S.C. § 105(a). But § 105(a) is not a "roving commission to do equity." *United States v. Sutton*, 786 F.2d 1305, 1308 (5th Cir. 1986). The Supreme Court drew the boundary definitively in *Law v. Siegel*, 571 U.S. 415, 421 (2014), holding unanimously that "a bankruptcy court may not contravene specific statutory provisions" through § 105(a). Section 105(a) empowers courts to *implement* the Code, not to *supersede* it.

46. The fee-allowance framework under §§ 328 and 330 is a specific statutory scheme: professionals are entitled to compensation only *after* the court determines that fees are reasonable and necessary. Ordering the pre-allowance deposit of disputed fees does not implement that scheme; it inverts it. *See also NexPoint Advisors v. Highland Capital Mgmt.*, 48 F.4th 419, 437 (5th Cir. 2022) (rejecting expansive application of § 105(a) to authorize relief not specifically provided by the Code).

THE ESCROW ORDER VIOLATES DUE PROCESS.

47. TopCo has a concrete property interest in the approximately $1.644 million in disputed funds. Those funds belong to TopCo under the confirmed Plan of Reorganization until a court orders their payment following allowance of the underlying claims. Compelled transfer of a property interest requires procedural due process. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) ("The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.")(cleaned up).

48. The Escrow Order was required at a status conference with no advance notice that the Court was considering such relief, no opportunity for TopCo to file written opposition, and no

evidentiary hearing. TopCo was afforded no meaningful opportunity to be heard before being deprived of a substantial sum. *See Goldberg v. Kelly*, 397 U.S. 254, 267–71 (1970) (due process includes the right to present evidence and confront adverse witnesses when substantial property interests are at stake).

PRAYER FOR RELIEF

WHEREFORE, ModivCare Topco, LLC respectfully requests that the Court enter an Order:

(1) Denying/Vacating the Order Requiring Deposit of Funds into the Court Registry as (a) a mandatory injunction for which no movant has demonstrated the requisite "clear entitlement" under *Justin Industries, Inc. v. Choctaw Securities, L.P.*, 920 F.2d 262, 268 n.7 (5th Cir. 1990), and *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7 (2008); (b) lacking any statutory authority under the Bankruptcy Code; and (c) entered without the notice, hearing, or evidentiary record required by due process;

(2) Denying/Vacating the Bifurcation Order and setting a single, unified evidentiary hearing at which all issues—legal and factual—are addressed on a complete record, consistent with FED. R. BANKR. P. 9014(d), 11 U.S.C. §§ 102(1) and 330(a)(1), and the Fifth Circuit's mandate in *In re U.S. Golf Corp.*, 639 F.2d 1197, 1202 (5th Cir. 1981);

(3) Setting a hearing on the pending Motion to Compel [ECF No. 1409] to allow TopCo to obtain the discovery necessary for the evidentiary hearing; and

(4) Granting such other and further relief as the Court deems just and proper.

Dated: April 9, 2026

Respectfully submitted,

By: */s/ Johnie J. Patterson*
Miriam Goott
SBN 24048846
Johnie Patterson
SBN 15601700
COUNSEL FOR TOPCO

OF COUNSEL:
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CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Objection was served electronically upon all parties entitled to notice pursuant to this Court's CM/ECF electronic noticing platform on April 9, 2026.

By:*/s/ Johnie Patterson*
Johnie Patterson

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

In re:	§	
	§	
MODIVCARE, INC., *et al.,*	§	Case No. 25-90309 (ARP)
	§	Chapter 11
Reorganized Debtors.	§	(Jointly Administered)
	§	Judge Alfredo R. Pérez

ORDER GRANTING RECONSIDERATION AND DENYING REQUEST FOR BIFURCATING LEGAL AND FACTUAL ISSUES AND DENYING REQUEST FOR DEPOSIT OF FUNDS INTO COURT REGISTRY

[Relates To Docket #_____]

Upon reconsideration, it is

ORDERED that the Fee Applications by White and Case and AlixPartners, and the objections thereto, shall be considered at an evidentiary hearing to be scheduled by the Court after a reasonable opportunity for discovery by both parties, and it is further

ORDERED that no escrow of funds is required.

Dated: _____

_____
UNITED STATES BANKRUPTCY JUDGE

verita

ACCOUNT ACKNOWLEDGMENT

Date: August 19, 2025

To: ModivCare Inc. (the "*Company*")

From: Kurtzman Carson Consultants, LLC dba Verita Global

Re: Professional Fee Escrow Account for ModivCare Inc.

Set forth below are the details for the account (the "*Account*") that Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") has set up as agent for the Company for purposes of providing certain fund services under that certain Services Agreement by and among Verita and the Company dated August 11, 2025 (the "Verita Agreement"), the terms of which are incorporated herein, and as set forth on *Exhibit A* hereto (the "*Engagement*"). The Company acknowledges and agrees that Verita will take direction from Company's representatives, employees, agents and/or professionals (collectively, the "Company Parties") with respect to the services.

Name of Account:	KCC AAF Restructuring Client Funds
Account Address:	222 N. Pacific Coast Hwy Ste 300, El Segundo CA 90245
Account No.:	[redacted]**5330**
SWIFT No.:	BOFAUS3N
Bank Name:	Bank of America
Bank Address:	115 W 42nd St, One Bryant Park, New York, NY 10036
Routing Number:	026009593
Special Instructions:	FBO ModivCare Professional Fee

The Company acknowledges that the Account will be held and maintained by Verita as agent for the Company. Verita will not pass through any bank fees charged in connection with maintenance of the Account and Verita shall be solely responsible for the payment of such fees. The amounts held in the Account, once transferred into the Account, are held at the sole risk of the Company.

The Company shall remain responsible for tax reporting. Verita, on behalf of the Company, shall undertake only those tax reporting and withholding services as are reasonably requested by the Company in writing. Any such tax related services shall be solely at the direction of the Company and Verita may rely on the direction of the Company.

If you have any questions regarding these matters, please contact Angela Nguyen of Verita at 310-708-6581.

SIGNATURE PAGE FOLLOWS

verita

KURTZMAN CARSON CONSULTANTS, LLC dba VERITA GLOBAL

_____

Name: Evan Gershbein
Position: Executive Vice President, Corporate Restructuring Services

AGREED TO AND ACCEPTED BY

MODIVCARE INC.

_____

Name: Faisal Khan, Esq.

Position: SVP, General Counsel & Secretary

AUTHORIZED REPRESENTATIVE FOR WIRE CONFIRMATIONS

NAME: Kelley Quinlan

FIRM: Modivcare

TITLE: Director of Treasury

TELEPHONE NUMBER: 720-937-2978

EMAIL: Kelley.Quinlan@modivcare.com

verita

EXHIBIT A

Fund Services

- Submit wires for professional fee payments under direction of the Company
- Monthly reporting and account reconciliation
- Escrow fee of $300 per outgoing wire
- Disbursement checks to be provided at the rate of $1.75 per check (printing and postage only)
- 1099 Tax reporting and W-9 mailing at the rate of $2.75 per tax form (printing and postage only) (only if specified by Company)
- All services subject to the standard fees and charges set forth in the Verita Agreement (*e.g.*, hourly consulting fees, printing charges, *etc.*)
- Additional services as requested by Company and agreed by Verita in writing

verita

Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

ACCOUNT SUMMARY

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

	TOTAL ACTIVITY	
	This Period	Year to Date
Opening Available Balance	**$0.00**	**$0.00**
Deposits to Account	**$75,311,437.90**	**$75,311,437.90**
Withdrawals from Account	**($73,666,540.92)**	**($73,666,540.92)**
Interest to Account	**$0.00**	**$0.00**
Closing Available Balance	**$1,644,896.98**	**$1,644,896.98**

verita

Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

TRANSACTION STATEMENT

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

DATE	DESCRIPTION	DEBT	CREDIT	BALANCE
	OPENING AVAILABLE BALANCE			**$0.00**
09/05/2025	Wire In from Modivcare Inc		$3,412,416.75	3,412,416.75
09/12/2025	Wire In from Modivcare Inc		$1,891,472.62	5,303,889.37
09/22/2025	Wire In from Modivcare Inc		$1,927,582.78	7,231,472.15
09/26/2025	Wire In from Modivcare Inc		$2,225,455.43	9,456,927.58
10/03/2025	Wire In from Modivcare Inc		$2,591,002.16	12,047,929.74
10/10/2025	Wire In from Modivcare Inc		$4,885,558.21	16,933,487.95
10/17/2025	Wire In from Modivcare Inc		$3,416,176.29	20,349,664.24
10/17/2025	Wire Out #1114 to KCC Parent LLC	$2,339,079.12		18,010,585.12
10/24/2025	Wire Out #1131 to Moelis & Company LLC	$400,000.00		17,610,585.12
10/24/2025	Wire In from Modivcare Inc		$7,017,379.59	24,627,964.71
10/31/2025	Wire In from Modivcare Inc		$3,264,745.24	27,892,709.95
11/07/2025	Wire In from Modivcare Inc		$4,780,000.00	32,672,709.95
11/13/2025	Wire Out #1196 to Hunton Andrews Kurth LLP	$367,783.15		32,304,926.80
11/14/2025	Wire In from Modivcare Inc		$3,955,562.10	36,260,488.90
11/14/2025	Wire Out #1203 to KCC Parent LLC	$2,616,255.07		33,644,233.83
11/14/2025	Wire Out #1204 to Latham & Watkins LLP	$5,377,787.57		28,266,446.26
11/14/2025	Wire Out #1205 to Moelis & Company LLC	$200,000.00		28,066,446.26
11/21/2025	Wire In from Modivcare Inc		$4,473,506.00	32,539,952.26
11/25/2025	Wire Out #1236 to FTI Consulting Inc	$2,131,754.94		30,408,197.32
11/25/2025	Wire Out #1237 to White & Case LLP	$2,085,596.14		28,322,601.18
11/26/2025	Wire In from Modivcare Inc		$4,500,884.50	32,823,485.68
12/02/2025	Wire Out #1253 to Hunton Andrews Kurth LLP	$233,696.24		32,589,789.44
12/04/2025	Wire Out #1262 to Moelis & Company LLC	$200,000.00		32,389,789.44
12/05/2025	Wire In from Modivcare Inc		$3,599,582.50	35,989,371.94
12/10/2025	Wire Out #1289 to FTI Consulting Inc	$450,000.00		35,539,371.94
12/12/2025	Wire In from Modivcare Inc		$4,217,330.00	39,756,701.94
12/12/2025	Wire Out #1300 to KCC Parent LLC	$445,327.40		39,311,374.54
12/19/2025	Wire In from Modivcare Inc		$4,343,753.20	43,655,127.74

verita

Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

TRANSACTION STATEMENT

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

DATE	DESCRIPTION	DEBT	CREDIT	BALANCE
12/19/2025	Wire Out #1335 to Latham & Watkins LLP	$3,630,800.84		40,024,326.90
12/19/2025	Wire Out #1336 to White & Case LLP	$2,907,413.48		37,116,913.42
12/24/2025	Wire Out #1345 to Moelis & Company LLC	$825,342.20		36,291,571.22
12/24/2025	Wire Out #1346 to White & Case LLP	$3,777,147.42		32,514,423.80
12/24/2025	Wire In from Modivcare Inc		$3,220,543.59	35,734,967.39
12/29/2025	Wire Out #1352 to Latham & Watkins LLP	$5,241,599.35		30,493,368.04
12/30/2025	Wire In from Modivcare Inc		$10,150,000.00	40,643,368.04
12/31/2025	Wire Out #1364 to FTI Consulting Inc	$1,327,607.51		39,315,760.53
12/31/2025	Wire Out #1365 to FTI Consulting Inc	$1,777,039.36		37,538,721.17
01/02/2026	Wire Out #1371 to Hunton Andrews Kurth LLP	$180,653.40		37,358,067.77
01/09/2026	Wire Out #1385 to White & Case LLP	$2,155,794.20		35,202,273.57
01/12/2026	Wire Out #1395 to AlixPartners Holdings LLC	$3,507,798.06		31,694,475.51
01/16/2026	Wire Out #1406 to Quinn Emanuel Urquhart & Sullivan LLP	$466,061.08		31,228,414.43
02/06/2026	Wire Out #1464 to AlixPartners Holdings LLC	$498,789.83		30,729,624.60
02/13/2026	Wire Out #1479 to White & Case LLP	$2,639,311.31		28,090,313.29
03/05/2026	Wire Out #1555 to Latham & Watkins LLP	$4,349,179.74		23,741,133.55
03/11/2026	Wire Out #1571 to Latham & Watkins LLP	$4,534,662.55		19,206,471.00
03/11/2026	Wire Out #1572 to Moelis & Company LLC	$8,146.06		19,198,324.94
03/11/2026	Wire Out #1573 to Moelis & Company LLC	$9,617,761.51		9,580,563.43
03/11/2026	Wire Out #1574 to Hunton Andrews Kurth LLP	$728,820.03		8,851,743.40
03/16/2026	Wire Out #1589 to FTI Consulting Inc	$3,089,692.07		5,762,051.33
03/16/2026	Wire Out #1590 to KCC Parent LLC	$372,620.94		5,389,430.39
03/31/2026	Wire Out #1656 to Quinn Emanuel Urquhart & Sullivan LLP	$1,607,698.64		3,781,731.75
04/10/2026	Wire In from ModivCare Buyer, LLC		$416,499.96	4,198,231.71
04/10/2026	Wire Out #1686 to KCC Parent LLC	$9,900.00		4,188,331.71
04/10/2026	Wire Out #1687 to ModivCare Buyer, LLC	$3,565,421.71		622,910.00
04/30/2026	Wire In from ModivCare Buyer, LLC		$1,021,000.00	1,643,910.00

verita

Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

TRANSACTION STATEMENT

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

DATE	DESCRIPTION	DEBT	CREDIT	BALANCE
05/11/2026	Wire In from ModivCare Buyer, LLC		$986.98	1,644,896.98
	CLOSING AVAILABLE BALANCE			**$1,644,896.98**

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

In re:	§	
	§	
	§	**Chapter 11**
MODIVCARE, INC.	§	
	§	
	§	**Case No. 25-90309**
Debtors.	§	
	§	**Jointly Administered**
	§	

MODIVCARE TOPCO, LLC'S RESPONSE AND OBJECTION TO WHITE & CASE LLP'S EMERGENCY MOTION FOR ENTRY OF AN ORDER FINDING MODIVCARE TOPCO, LLC IN CIVIL CONTEMPT

ModivCare TopCo, LLC ("TopCo"), by and through undersigned counsel, hereby files this Response and Objection (the "Response") to White & Case LLP's Emergency Motion for Entry of an Order Finding ModivCare TopCo, LLC in Civil Contempt [Dkt. No. 1521] (the "Contempt Motion"). For the reasons set forth below, the Contempt Motion is procedurally improper, factually unsupported, and legally meritless. The Court should deny the Contempt Motion in its entirety.

PRELIMINARY STATEMENT

1. **Rule 9011 of the Federal Rules of Bankruptcy Procedure** imposes on every signatory of a pleading filed in this Court an affirmative, non-delegable duty to conduct a reasonable factual inquiry before placing allegations before a federal court. FED. R. BANKR. P. 9011(b). The Rule's mandate is unequivocal: by presenting a pleading to the Court, counsel certifies that "the factual contentions have evidentiary support" and that the allegations are "not being presented for any improper purpose, such as to harass, cause unnecessary delay, or

needlessly increase the cost of litigation." FED. R. BANKR. P. 9011(b)(1), (3). That mandate is not aspirational. The Fifth Circuit has repeatedly held that Rule 11 and its bankruptcy analogue "require that pleadings be grounded in fact," and that subjective belief or rank speculation — absent objectively reasonable inquiry — will not suffice. See *Childs v. State Farm Mut. Auto. Ins. Co.*, 29 F.3d 1018, 1024 (5th Cir. 1994) ("Rule 11 requires that an attorney conduct a reasonable inquiry into the relevant law and facts before signing pleadings"); *Thomas v. Capital Sec. Servs., Inc*., 836 F.2d 866, 874 (5th Cir. 1988) (*en banc*) (Rule 11 sanctions warranted where "a reasonable inquiry would have revealed there was no basis in law or fact for the asserted claim")[1]. That standard is heightened, not lessened, when the relief sought is the extraordinary remedy of civil contempt.

2. **The Contempt Motion violates these foundational obligations.** White & Case repeatedly couches its central accusations in the language of suspicion and conjecture. It pleads that TopCo is "likely in violation of the Confirmation Order" (Contempt Motion ¶ 17); that it has "concerns" about whether the Professional Fee Escrow was ever funded (*Id*. ¶ 3); that Walker & Patterson, P.C. ("WP") was "unable to address the most basic questions" about an escrow account that has been operating, with monthly statements, since September 2025 (*Id*. ¶ 8); and that TopCo's purported "inability to demonstrate that the funds are held in a proper escrow arrangement—rather than merely in TopCo's own possession—underscores precisely why it is now defying the Escrow Order" (*Id*. ¶ 17). These are not factual allegations supported by any evidentiary inquiry. In fact, White & Case has had actual knowledge of the escrow account for months, having received

[1] Rule 11 [Fed. R. Bankr. P. 9011] amended after *Thomas* to provide "later advocating" a baseless position as an additional ground for sanctions.

distributions in excess of $12 million directly from the escrow account. Their claims of ignorance, or doubtfulness exceed believability.

3. **A modest factual inquiry would have disposed of every speculative premise of the Contempt Motion.** The Professional Fee Escrow Account exists. It has existed since August 19, 2025, when ModivCare Inc. and Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita") — the Court-approved claims and noticing agent in these Chapter 11 Cases — executed an Account Acknowledgment establishing Account No. 4426855330-155 at Bank of America, captioned "ModivCare Inc Professional Fee Escrow Account," held "FBO ModivCare Professional Fee." A true and correct copy of the Account Acknowledgment is attached hereto as Exhibit A. Verita serves as the agent on that Account, takes direction from the Company's authorized representatives, and — critically — issues account statements documenting every wire in and every wire out of the Account. The current Verita statement, dated as of May 11, 2026, reflects a closing available balance of $1,644,896.98 — the precise dollar figure that the Escrow Order requires to be deposited ($628,727.58 in connection with the W&C Application plus $1,016,169.40 in connection with the AlixPartners Application). A true and correct copy of the May 11, 2026 Verita statement is attached hereto as Exhibit B.

4. **These facts were known/knowable to White & Case before it filed the Contempt Motion. First,** White & Case ***actually received distributions from the escrow account in excess of $12 million***, yet claims complete ignorance of its existence. See Ex. B. Verita is the very same noticing agent White & Case identifies in the footer of its own pleadings as the Reorganized Debtors' proposed claims and noticing agent. See Contempt Motion at 1 n.1 (directing parties to https://www.veritaglobal.net/ModivCare). Whether the disputed funds had been segregated in a Verita-administered escrow account at a national banking institution was a

question that any reasonable pre-filing inquiry would have resolved. White & Case chose instead to file a contempt motion premised on speculation about an account whose existence and administration were susceptible to confirmation through ordinary diligence. Rule 9011 does not tolerate that approach.

5. **Stripped of its speculation, the Contempt Motion reduces to a single, narrow grievance:** that TopCo has not, in the eleven calendar days between entry of the Escrow Order on April 30, 2026 and the May 11, 2026 filing of the Contempt Motion, mechanically wired $1,644,896.98 from the Verita-administered Professional Fee Escrow Account into the registry of this Court. That grievance does not, and cannot, support civil contempt for at least four independently sufficient reasons: (i) the Escrow Order is internally contradictory on its face, commanding compliance by a deadline (April 14, 2026) that had expired sixteen days before the order was signed (April 30, 2026), rendering the order non-specific within the meaning of Fifth Circuit contempt jurisprudence; (ii) TopCo has filed a timely Notice of Appeal and an Emergency Motion for Stay Pending Appeal that this Court has set for hearing contemporaneously with the Contempt Motion, and TopCo is entitled to the orderly disposition of that motion before being subjected to the most coercive remedy in the Court's arsenal; (iii) TopCo has made good-faith efforts at compliance — including contacting the Clerk's finance office for registry-deposit instructions — which, under controlling Fifth Circuit authority, weighs heavily against any finding of contempt; and (iv) the underlying funds remain fully preserved, identifiable, and untouched in the Verita escrow account, such that there is no harm — let alone the kind of harm that justifies the extraordinary remedy of civil contempt and attorneys' fees.

6. **The Court should deny the Contempt Motion.** White & Case is free to disagree with TopCo's legal positions on appeal. It is not free to substitute innuendo for inquiry, or to

weaponize a contempt motion to extract attorneys' fees on the basis of allegations that the actual record — now before the Court as Exhibits A and B — refutes.

BACKGROUND

7. TopCo incorporates by reference the procedural background set forth in its Emergency Motion for Stay Pending Appeal [Dkt. No. 1518] (the "Stay Motion"). The facts material to this Response are summarized briefly below.

8. **A. The Professional Fee Escrow Account Was Established Pre-Effective Date and Has Been Continuously Administered by Verita.** On August 19, 2025 — well before the December 29, 2025 Effective Date — ModivCare Inc. and Verita executed an Account Acknowledgment establishing the Professional Fee Escrow Account at Bank of America (Account No. 4426855330-155). See Ex. A. The Account is captioned "KCC AAF Restructuring Client Funds" with the special instruction "FBO ModivCare Professional Fee." *Id*. Verita acts as agent for the Company and takes direction from authorized Company representatives. *Id*. The Account Acknowledgment incorporates Verita's services agreement, which includes monthly reporting and reconciliation. See *Id*., Ex. A (Fund Services).

9. **B. The Account Has Been Funded and Disbursed in Accordance With the Plan.** From September 5, 2025 through May 11, 2026, the Reorganized Debtors funded the Professional Fee Escrow Account in the aggregate amount of $75,311,437.90 through periodic wires from ModivCare Inc. and, post-Effective Date, ModivCare Buyer, LLC. See Ex. B at 1. Over that same period, Verita — acting on direction — disbursed $73,666,540.92 in numbered, sequential wires to the estate professionals identified in the Plan, including Latham & Watkins LLP, White & Case LLP, FTI Consulting Inc., Moelis & Company LLC, AlixPartners Holdings

LLC, KCC Parent LLC, Hunton Andrews Kurth LLP, and Quinn Emanuel Urquhart & Sullivan LLP. Id. at 2–4. As of May 11, 2026, the Account holds a closing available balance of $1,644,896.98 — an amount equal, to the penny, to the sum required by the Escrow Order. *Id*. at 4. White & Case received actual, direct distributions from the account they claim to have no knowledge of:

a.	11/25/25 – Wire#1237 to White & Case	$2,085,596.14
b.	12/19/25 – Wire #1336 to White & Case	$2,907,413.48
c.	12/24/25 – Wire #1346 to White & Case	$3,777,147.42
d.	1/9/26 – Wire #1385 to White & Case	$2,155,794.20
e.	2/13/26 – Wire #1479 to White & Case	$2,639,311.31

10. **C. The Escrow Order Was Entered April 30, 2026 With an Already-Expired Deadline.** Following the Court's April 6, 2026 status conference, the Court entered the Order Requiring the Reorganized Debtors to Deposit Funds in Escrow With the Court [Dkt. No. 1502] (the "Escrow Order") on April 30, 2026. Paragraph 1 of the Escrow Order provides that the Reorganized Debtors "shall deposit or cause or to be deposited in the registry" of this Court, "on or before April 14, 2026," funds equal to $1,644,896.98. Escrow Order ¶ 1. The April 14, 2026 deadline appears on the face of an order signed sixteen days later, on April 30, 2026. See *Id*.

11. **D. TopCo Has Pursued Proper Appellate Channels.** Following entry of the Escrow Order, TopCo timely filed a Notice of Appeal [Dkt. No. 1506] and an Emergency Motion for Stay Pending Appeal [Dkt. No. 1518]. The Stay Motion is set for emergency hearing concurrently with the Contempt Motion. TopCo has not been dilatory; it has used the proper procedural channels available to a party that disputes the validity of a bankruptcy court order.

ARGUMENT

I. CIVIL CONTEMPT IS AN EXTRAORDINARY REMEDY REQUIRING CLEAR AND CONVINCING EVIDENCE OF VIOLATION OF A DEFINITE AND SPECIFIC ORDER.

12. **Civil contempt is, in the Fifth Circuit, an "extraordinary remedy" that requires the movant to prove three elements** by clear and convincing evidence: (1) the existence of a definite and specific court order requiring the alleged contemnor to perform or refrain from performing a particular act; (2) the alleged contemnor had knowledge of the order; and (3) the alleged contemnor failed to comply with the order. *Test Masters Educ. Servs., Inc. v. Singh*, 428 F.3d 559, 581–82 (5th Cir. 2005); *In re Bradley*, 588 F.3d 254, 264 (5th Cir. 2009); FDIC v. LeGrand, 43 F.3d 163, 170 (5th Cir. 1995) ("In a civil contempt proceeding, the contemnor's violation … need not be willful, but the underlying order must be definite and specific."). The clear-and-convincing standard is a "demanding standard of proof" that requires "a high probability" of the truth of the moving party's factual allegations, materially more stringent than the preponderance-of-the-evidence standard applicable to ordinary civil disputes. *Travelhost, Inc. v. Blandford*, 68 F.3d 958, 961 (5th Cir. 1995).

13. **Doubts about the order's meaning, about its scope, about whether conduct falls within its prohibition must be resolved in favor of the alleged contemnor as a matter of law.** See *Martin v. Trinity Indus., Inc.*, 959 F.2d 45, 47 (5th Cir. 1992) Contempt "should not be used if the court's order upon which the contempt was founded is vague or ambiguous."); *Hornbeck Offshore Servs., L.L.C. v. Salazar*, 713 F.3d 787, 792 (5th Cir. 2013) (same).

14. **White & Case cannot satisfy this demanding standard.** The Escrow Order is not "definite and specific" — it commands compliance by a date that had already passed when the order was signed. TopCo had no "knowledge" of any clear, operative deadline, because no clear

deadline exists on the face of the order, and irrespective has worked with the Court's Clerk's office to arrange the orderly deposit of the funds. And TopCo has not "failed to comply" in the sense required by *Bradley* and *Test Masters*: the funds are preserved, segregated, and identifiable in a Verita-administered escrow account, and TopCo has actively engaged with the Clerk's office and the Court to address what its appellate filings make plain are open and substantial legal questions about whether the Escrow Order was properly entered in the first place.

II. THE ESCROW ORDER IS NOT "DEFINITE AND SPECIFIC" BECAUSE IT COMMANDS COMPLIANCE BY A DEADLINE THAT EXPIRED BEFORE THE ORDER WAS SIGNED.

15. **The first element of civil contempt — a "definite and specific" order — is foundational.** An order that is ambiguous on its face cannot support contempt. See *Martin*, 959 F.2d at 47; *Piggly Wiggly Clarksville, Inc. v. Mrs. Baird's Bakeries*, 177 F.3d 380, 382-83 (5th Cir. 1999) (An order which is vague or ambiguous may not support a finding of contempt) (citations omitted).

16. **The Escrow Order fails this test.** Its operative paragraph — paragraph 1 — reads:

> *The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Court Registry"), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought in the Applications, including $628,727.58 in connection with the W&C Application and $1,016,169.40 in connection with the AlixPartners Application.*

17. **The Escrow Order was signed April 30, 2026 — sixteen days after the compliance deadline it purports to impose.** That is not a hypothetical drafting ambiguity. It is a direct and unavoidable internal contradiction: the order commands compliance by April 14, 2026, but the order did not exist on April 14, 2026. "Compliance" with such an order is a logical

impossibility. White & Case attempts to recast this fatal defect as a mere "scrivener's error" that should be looked past. Contempt Motion ¶ 27. White & Case cannot have it both ways — it cannot invite the Court to disregard the order's express terms while simultaneously demanding that the Court hold TopCo in contempt for failing to comply with those same terms.

III. TOPCO HAS NOT WILLFULLY VIOLATED ANY ORDER; ITS GOOD-FAITH EFFORTS AND ACTIVE APPELLATE LITIGATION WEIGH AGAINST CONTEMPT.

18. **Although civil contempt does not require a finding of willfulness,** the alleged contemnor's good-faith conduct is squarely relevant to whether "failure to comply" has been established by clear and convincing evidence, and to whether the equitable remedy of contempt should issue. The objective "no fair ground of doubt" standard recently employed by the Supreme Court brought with it traditional standards of equity, including a suggestion that contempt may be improper if a party's attempt at compliance was reasonable. *Taggart v. Lorenzen*, 587 U.S. 554, 561 (2019)(citations omitted).

20. **TopCo's conduct here reflects diligence, not defiance.** First, TopCo timely filed a Notice of Appeal of the Escrow Order [Dkt. No. 1506] and an Emergency Motion for Stay Pending Appeal [Dkt. No. 1518]. Second, TopCo contacted the Clerk's finance office to determine the procedural mechanism for registry deposit — hardly the conduct of a litigant intent on flouting a court order. Since at least May 8, TopCo has worked with the Clerk's office to arrange for the deposit as ordered by the Court. Communication with the Clerk's office has been ongoing, primarily due to the large amount of money and the logistical details inherent in depositing money with the government. Third, the disputed funds remain intact, segregated, and identifiable in a properly constituted escrow account, on deposit with a Court-approved agent (Verita), at an

institution of national standing (Bank of America). The funds have not been dissipated. They have not been commingled. They have not been transferred to any non-escrow account. See Ex. B.

21. **White & Case insinuates, without evidence, that the funds may be "dissipate[d], commingle[d], or otherwise rendered unavailable." Contempt Motion ¶ 24.** This is precisely the kind of allegation that Rule 9011 forbids. The Verita statement attached as Exhibit B establishes the contrary on a transaction-by-transaction basis: every wire in, every wire out, and a closing balance that matches the Escrow Order to the penny. Reasonable pre-filing inquiry into the very Verita platform that White & Case received funds directly from would have informed its opinion.

22. **White & Case's own pleading concedes that TopCo "intends to comply with the Escrow Order."** Contempt Motion ¶ 16. A party whose intent to comply is acknowledged by the very movant seeking sanctions cannot fairly be said to have "failed to comply" within the meaning of *Taggart*, particularly where the asserted noncompliance is measured in days, the asserted order is facially defective, and a Stay Motion is pending.

IV. THE PENDING STAY MOTION AND APPEAL COUNSEL AGAINST CONTEMPT.

23. **TopCo has not disputed that a notice of appeal does not, of itself, stay the operation of a bankruptcy court order.** See FED. R. BANKR. P. 8007. But the pendency of a timely, substantive Stay Motion, scheduled for emergency hearing contemporaneously with the contempt motion White & Case is pressing, weighs heavily against the equitable remedy of contempt. Civil contempt is a discretionary, equitable sanction. See *Taggart* at 561. The Court is empowered, and should be inclined, to dispose first of the Stay Motion, which raises substantial legal questions about the procedural and substantive validity of the Escrow Order, before turning

to whether TopCo should be sanctioned for failing to comply with that very order in the brief interval between its entry and the hearing on the Stay Motion. Imposing contempt sanctions for failing to deposit funds before resolution of the Stay Motion would render the stay relief illusory.

24. **The Fifth Circuit's decision in** *Seven Arts Filmed Ent. Ltd. v. Jonesfilm*, 538 F. App'x 444 (5th Cir. 2013), on which White & Case principally relies, does not compel a contrary result. Seven Arts involved a party that took no steps to seek a stay and committed repeated, escalating violations over an extended period. *Id*. at 446–47. TopCo, by contrast, noticed an appeal and filed an emergency Stay Motion within days of the Escrow Order's. The Seven Arts rule does not strip a party that pursues proper appellate channels of the protection of the orderly adjudicative process; it merely confirms that the filing of a notice of appeal, standing alone, is insufficient.

V. WHITE & CASE'S REQUEST FOR ATTORNEYS' FEES SHOULD BE DENIED.

25. **Because contempt is not warranted, fees are not warranted.** See *In re Bradley*, 588 F.3d at 265 (fees follow from contempt finding). But even if the Court were to find some technical noncompliance, the equitable remedy of attorneys' fees is committed to the Court's sound discretion and is inappropriate where the moving party itself bears responsibility for the disputed proceedings. See *Cook v. Ochsner Found. Hosp.*, 559 F.2d 270, 272 (5th Cir. 1977) (fee award in contempt is discretionary). Here, White & Case (i) elected to file a contempt motion eleven calendar days after entry of an internally contradictory order; (ii) did so in the face of a pending Stay Motion set for the same hearing date; (iii) did so knowing of the existence of the Verita-administered escrow account; and (iv) without conducting reasonable pre-filing inquiry into facts — the segregation and present balance of the funds — that the actual record, now before the Court, establishes. To award fees on this record would be to reward, not redress, the kind of speculative pleading practice Rule 9011 was designed to prevent.

26. **Should the Court deem any party's conduct deserving of fee-shifting, TopCo respectfully reserves the right to seek its own fees** incurred in responding to a contempt motion built on speculation, omission, and disregard of known facts and facts that reasonable inquiry would have surfaced.

CONCLUSION

27. **For the reasons set forth above, TopCo respectfully requests that the Court** (i) deny the Contempt Motion in its entirety; (ii) deny White & Case's request for attorneys' fees and costs; and (iii) grant TopCo such other and further relief as the Court deems just and proper.

Dated: May 18, 2026

Respectfully submitted,

/s/ Johnie Patterson
Johnie Patterson
SBN 15601700

OF COUNSEL:
WALKER & PATTERSON, P.C.
P.O. Box 61301
Houston, TX 77208-1301
(713)956-5577 Phone
(713)956-5570 Fax
jjp@walkerandpatterson.com

CERTIFICATE OF SERVICE

I, Johnie Patterson, hereby certify that a true and correct copy of the foregoing Emergency Motion was served on May 7, 2026, via the Court's CM/ECF system to all parties consenting to service through the same, and via email to White & Case and AlixPartners.

By:*/s/Johnie Patterson*
Johnie Patterson

verita

ACCOUNT ACKNOWLEDGMENT

Date: August 19, 2025

To: ModivCare Inc. (the "*Company*")

From: Kurtzman Carson Consultants, LLC dba Verita Global

Re: Professional Fee Escrow Account for ModivCare Inc.

Set forth below are the details for the account (the "*Account*") that Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") has set up as agent for the Company for purposes of providing certain fund services under that certain Services Agreement by and among Verita and the Company dated August 11, 2025 (the "Verita Agreement"), the terms of which are incorporated herein, and as set forth on *Exhibit A* hereto (the "*Engagement*"). The Company acknowledges and agrees that Verita will take direction from Company's representatives, employees, agents and/or professionals (collectively, the "Company Parties") with respect to the services.

Name of Account:	KCC AAF Restructuring Client Funds
Account Address:	222 N. Pacific Coast Hwy Ste 300, El Segundo CA 90245
Account No.:	[redacted]**5330**
SWIFT No.:	BOFAUS3N
Bank Name:	Bank of America
Bank Address:	115 W 42nd St, One Bryant Park, New York, NY 10036
Routing Number:	026009593
Special Instructions:	FBO ModivCare Professional Fee

The Company acknowledges that the Account will be held and maintained by Verita as agent for the Company. Verita will not pass through any bank fees charged in connection with maintenance of the Account and Verita shall be solely responsible for the payment of such fees. The amounts held in the Account, once transferred into the Account, are held at the sole risk of the Company.

The Company shall remain responsible for tax reporting. Verita, on behalf of the Company, shall undertake only those tax reporting and withholding services as are reasonably requested by the Company in writing. Any such tax related services shall be solely at the direction of the Company and Verita may rely on the direction of the Company.

If you have any questions regarding these matters, please contact Angela Nguyen of Verita at 310-708-6581.

SIGNATURE PAGE FOLLOWS

verita

KURTZMAN CARSON CONSULTANTS, LLC dba VERITA GLOBAL

_____

Name: Evan Gershbein
Position: Executive Vice President, Corporate Restructuring Services

AGREED TO AND ACCEPTED BY

MODIVCARE INC.

_____

Name: Faisal Khan, Esq.

Position: SVP, General Counsel & Secretary

AUTHORIZED REPRESENTATIVE FOR WIRE CONFIRMATIONS

NAME: Kelley Quinlan

FIRM: Modivcare

TITLE: Director of Treasury

TELEPHONE NUMBER: 720-937-2978

EMAIL: Kelley.Quinlan@modivcare.com

verita

EXHIBIT A

Fund Services

- Submit wires for professional fee payments under direction of the Company
- Monthly reporting and account reconciliation
- Escrow fee of $300 per outgoing wire
- Disbursement checks to be provided at the rate of $1.75 per check (printing and postage only)
- 1099 Tax reporting and W-9 mailing at the rate of $2.75 per tax form (printing and postage only) (only if specified by Company)
- All services subject to the standard fees and charges set forth in the Verita Agreement (*e.g.*, hourly consulting fees, printing charges, *etc.*)
- Additional services as requested by Company and agreed by Verita in writing

verita

Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

ACCOUNT SUMMARY

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

	TOTAL ACTIVITY	
	This Period	Year to Date
Opening Available Balance	**$0.00**	**$0.00**
Deposits to Account	**$75,311,437.90**	**$75,311,437.90**
Withdrawals from Account	**($73,666,540.92)**	**($73,666,540.92)**
Interest to Account	**$0.00**	**$0.00**
Closing Available Balance	**$1,644,896.98**	**$1,644,896.98**

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Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

TRANSACTION STATEMENT

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

DATE	DESCRIPTION	DEBT	CREDIT	BALANCE
	OPENING AVAILABLE BALANCE			**$0.00**
09/05/2025	Wire In from Modivcare Inc		$3,412,416.75	3,412,416.75
09/12/2025	Wire In from Modivcare Inc		$1,891,472.62	5,303,889.37
09/22/2025	Wire In from Modivcare Inc		$1,927,582.78	7,231,472.15
09/26/2025	Wire In from Modivcare Inc		$2,225,455.43	9,456,927.58
10/03/2025	Wire In from Modivcare Inc		$2,591,002.16	12,047,929.74
10/10/2025	Wire In from Modivcare Inc		$4,885,558.21	16,933,487.95
10/17/2025	Wire In from Modivcare Inc		$3,416,176.29	20,349,664.24
10/17/2025	Wire Out #1114 to KCC Parent LLC	$2,339,079.12		18,010,585.12
10/24/2025	Wire Out #1131 to Moelis & Company LLC	$400,000.00		17,610,585.12
10/24/2025	Wire In from Modivcare Inc		$7,017,379.59	24,627,964.71
10/31/2025	Wire In from Modivcare Inc		$3,264,745.24	27,892,709.95
11/07/2025	Wire In from Modivcare Inc		$4,780,000.00	32,672,709.95
11/13/2025	Wire Out #1196 to Hunton Andrews Kurth LLP	$367,783.15		32,304,926.80
11/14/2025	Wire In from Modivcare Inc		$3,955,562.10	36,260,488.90
11/14/2025	Wire Out #1203 to KCC Parent LLC	$2,616,255.07		33,644,233.83
11/14/2025	Wire Out #1204 to Latham & Watkins LLP	$5,377,787.57		28,266,446.26
11/14/2025	Wire Out #1205 to Moelis & Company LLC	$200,000.00		28,066,446.26
11/21/2025	Wire In from Modivcare Inc		$4,473,506.00	32,539,952.26
11/25/2025	Wire Out #1236 to FTI Consulting Inc	$2,131,754.94		30,408,197.32
11/25/2025	Wire Out #1237 to White & Case LLP	$2,085,596.14		28,322,601.18
11/26/2025	Wire In from Modivcare Inc		$4,500,884.50	32,823,485.68
12/02/2025	Wire Out #1253 to Hunton Andrews Kurth LLP	$233,696.24		32,589,789.44
12/04/2025	Wire Out #1262 to Moelis & Company LLC	$200,000.00		32,389,789.44
12/05/2025	Wire In from Modivcare Inc		$3,599,582.50	35,989,371.94
12/10/2025	Wire Out #1289 to FTI Consulting Inc	$450,000.00		35,539,371.94
12/12/2025	Wire In from Modivcare Inc		$4,217,330.00	39,756,701.94
12/12/2025	Wire Out #1300 to KCC Parent LLC	$445,327.40		39,311,374.54
12/19/2025	Wire In from Modivcare Inc		$4,343,753.20	43,655,127.74

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Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

TRANSACTION STATEMENT

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

DATE	DESCRIPTION	DEBT	CREDIT	BALANCE
12/19/2025	Wire Out #1335 to Latham & Watkins LLP	$3,630,800.84		40,024,326.90
12/19/2025	Wire Out #1336 to White & Case LLP	$2,907,413.48		37,116,913.42
12/24/2025	Wire Out #1345 to Moelis & Company LLC	$825,342.20		36,291,571.22
12/24/2025	Wire Out #1346 to White & Case LLP	$3,777,147.42		32,514,423.80
12/24/2025	Wire In from Modivcare Inc		$3,220,543.59	35,734,967.39
12/29/2025	Wire Out #1352 to Latham & Watkins LLP	$5,241,599.35		30,493,368.04
12/30/2025	Wire In from Modivcare Inc		$10,150,000.00	40,643,368.04
12/31/2025	Wire Out #1364 to FTI Consulting Inc	$1,327,607.51		39,315,760.53
12/31/2025	Wire Out #1365 to FTI Consulting Inc	$1,777,039.36		37,538,721.17
01/02/2026	Wire Out #1371 to Hunton Andrews Kurth LLP	$180,653.40		37,358,067.77
01/09/2026	Wire Out #1385 to White & Case LLP	$2,155,794.20		35,202,273.57
01/12/2026	Wire Out #1395 to AlixPartners Holdings LLC	$3,507,798.06		31,694,475.51
01/16/2026	Wire Out #1406 to Quinn Emanuel Urquhart & Sullivan LLP	$466,061.08		31,228,414.43
02/06/2026	Wire Out #1464 to AlixPartners Holdings LLC	$498,789.83		30,729,624.60
02/13/2026	Wire Out #1479 to White & Case LLP	$2,639,311.31		28,090,313.29
03/05/2026	Wire Out #1555 to Latham & Watkins LLP	$4,349,179.74		23,741,133.55
03/11/2026	Wire Out #1571 to Latham & Watkins LLP	$4,534,662.55		19,206,471.00
03/11/2026	Wire Out #1572 to Moelis & Company LLC	$8,146.06		19,198,324.94
03/11/2026	Wire Out #1573 to Moelis & Company LLC	$9,617,761.51		9,580,563.43
03/11/2026	Wire Out #1574 to Hunton Andrews Kurth LLP	$728,820.03		8,851,743.40
03/16/2026	Wire Out #1589 to FTI Consulting Inc	$3,089,692.07		5,762,051.33
03/16/2026	Wire Out #1590 to KCC Parent LLC	$372,620.94		5,389,430.39
03/31/2026	Wire Out #1656 to Quinn Emanuel Urquhart & Sullivan LLP	$1,607,698.64		3,781,731.75
04/10/2026	Wire In from ModivCare Buyer, LLC		$416,499.96	4,198,231.71
04/10/2026	Wire Out #1686 to KCC Parent LLC	$9,900.00		4,188,331.71
04/10/2026	Wire Out #1687 to ModivCare Buyer, LLC	$3,565,421.71		622,910.00
04/30/2026	Wire In from ModivCare Buyer, LLC		$1,021,000.00	1,643,910.00

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Bank Name	BOA - Bank of America
Account Name	ModivCare Inc Professional Fee Escrow Account
Account Number	[redacted]5330-155 Currency USD
Case Manager	

Case Code: MODPF
ModivCare Inc Professional Fee Escrow Account
EIN:

TRANSACTION STATEMENT

From: Monday, September 1, 2025 - To: Monday, May 11, 2026

DATE	DESCRIPTION	DEBT	CREDIT	BALANCE
05/11/2026	Wire In from ModivCare Buyer, LLC		$986.98	1,644,896.98
	CLOSING AVAILABLE BALANCE			**$1,644,896.98**

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

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

WHITE & CASE LLP'S
WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED
FOR MAY 20, 2026, AT 8:30 A.M. (PREVAILING CENTRAL TIME)

White & Case LLP ("**White & Case**") hereby files its Witness and Exhibit List for the hearing to be held on May 20, 2026 at 8:30 a.m. (prevailing Central Time) (the "**Hearing**"):

WITNESSES

White & Case reserves the right to supplement or amend this witness list and to identify additional witnesses, including rebuttal and impeachment witnesses, prior to the conclusion of the Hearing. White & Case also reserves the right to call any witness or submit any declaration necessary to establish the authenticity or admissibility of documents; call any witness identified by any other party; cross examine any witness called by another party; and call rebuttal witnesses as necessary.

[1] A complete list of each of the Reorganized Debtors in these 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' proposed claims and noticing agent at https://www.veritaglobal.net/ModivCare. Reorganized Debtor ModivCare Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

EXHIBITS

White & Case may introduce the following exhibits:

1. All pleadings, motions, orders, and other documents filed with the Court in the above-captioned cases.
2. Any exhibits offered for purposes of impeachment.
3. Any exhibits identified or offered by any other party.

White & Case reserves all rights, including, without limitation, to: (i) amend and/or supplement the Exhibit List, including to add and/or remove documents at any time prior to the conclusion of the Hearing, as appropriate; (ii) use additional exhibits (a) for purposes of rebuttal or refreshing recollection, (b) in response to arguments, evidence, objections, filings, exhibits, or demonstratives of other parties, or (c) as a consequence of the unexpected unavailability of a witness, or a witness unexpectedly testifying. Designation of any document on the Exhibit List does not waive any objection that White & Case may have if other parties seek to introduce into evidence any documents that White & Case has included on the Exhibit List. White & Case reserves all rights to object to any document listed on any party's exhibit list. White & Case further reserves the right to use and rely upon demonstratives. By including a document on this Exhibit List, White & Case does not agree or admit that a document or category of documents is admissible for any or all purposes or that the producing party has properly designated a document. White & Case reserves the right to object if other parties seek to introduce into evidence exhibits that White & Case has identified.

RESERVATION OF RIGHTS

White & Case reserves the right to call or introduce one or more, or none, of these witnesses or exhibits listed above. White & Case reserves the right to supplement, add to, subtract from, or otherwise amend this Witness and Exhibit List at any time prior to the conclusion of the Hearing.

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May 19, 2026
Houston, Texas

/s/ Charles R. Koster

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- and -

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